Division of Land / Environmental Review

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FINAL ENVIRONMENTAL IMPACT REPORT

SHERMAN OAKS – STUDIO CITY – TOLUCA LAKE – CAHUENGA PASS COMMUNITY PLAN AREA

Buckley School Campus Enhancement Plan

ENV-2004-7171-EIR
State Clearinghouse No. 2005011055

Council District 5

THIS DOCUMENT COMPRISES THE SECOND AND FINAL PART OF THE ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PROJECT DESCRIBED. THE DRAFT EIR, WHICH WAS PREVIOUSLY CIRCULATED FOR PUBLIC REVIEW AND COMMENT, COMPRISES THE FIRST PART.

Project Address: 3900 Stansbury Avenue, Sherman Oaks, CA 91423

Project Description: The Buckley School (the School), the project Applicant, proposes to enhance its existing campus facilities located at 3900 Stansbury Avenue in the Sherman Oaks Community of the City of Los Angeles. The improvements are proposed as part of the Campus Enhancement Plan, the intent of which is to address the needs of existing and future school programs, including the provision of adequate teaching space for all educational levels, specialty teaching spaces, and multipurpose spaces for educational gatherings that cannot occur in a standard classroom. The project also provides for the modernization of existing facilities, improved disabled access, and energy efficiency upgrades. Included within the Campus Enhancement Plan are vehicular circulation and queuing improvements, increased parking within a new enclosed parking facility, the demolition of six buildings, construction of five new/replacement buildings, a central plant, and addition to and/or renovation of several existing buildings. Upon completion, a net addition of approximately 69,500 square feet of building area would be provided, resulting in a total of 168,650 square feet of educational facilities within the project site. Project implementation would require various approvals, including but not limited to, Specific Plan Exceptions and Environmental Findings pursuant to the Mulholland Scenic Parkway Specific Plan, a new Conditional Use Permit that among other things would allow an increase in enrollment of up to 80 students for a maximum enrollment of 830 students, Modification of the height and area regulations, Site Plan Review findings, a preliminary Parcel Map to create two legal lots, and Design Review pursuant to the Mulholland Scenic Parkway Specific Plan.

APPLICANT:
The Buckley School

PREPARED BY:
Environmental Review Section
Los Angeles City Planning Department

October 2007

EAF NO.: ENV-2004-7171-EIR **SCH NO.:** 2005011055

PROJECT NAME: Buckley School Campus Enhancement Plan

RECOMMENDATION FOR EIR CERTIFICATION

Pursuant to California Code of Regulations, Title 14, Section 15090, this Environmental Impact Report has been completed in compliance with the California Environmental Quality Act and current State and City Guidelines and based on information available may be accepted and considered prior to making a final decision on the project. The decision maker or decision making body must certify that it has reviewed and considered the information contained in this Environmental Impact Report prior to making such decision.

Approved by:

Michael Young
Deputy Advisory Agency
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City Planning Department

Submitted by:

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I. SUMMARY

I. SUMMARY

This Final EIR has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA) with respect to the proposed Buckley School Campus Enhancement Plan.

As described in Sections 15089 and 15132 of the Guidelines for the California Environmental Quality Act (CEQA Guidelines), the lead agency must prepare a Final EIR before approving the project. The purpose of a Final EIR is to provide an opportunity for the lead agency to respond to comments made by the public and agencies. Pursuant to CEQA Guidelines Section 15132, this Final EIR includes a revised summary, corrections and additions to the Draft EIR, a list of persons, organizations, and agencies commenting on the Draft EIR, responses to comments, and a Mitigation Monitoring and Reporting Program.

This Final EIR is intended to be a companion to the November 2006 Draft EIR, which is incorporated by reference and bound separately. (Refer to Volumes I through IV of the Draft EIR). This Final EIR is organized into four main sections and appendices, as follows:

Section I, Summary—This section provides an overview and background of the proposed project and its potential impacts.

Section II, Corrections and Additions to the Draft EIR—This section provides a list of revisions that have been made to the Draft EIR, based on comments received from the public and agencies, and other items requiring updating and/or corrections.

Section III, Responses to Written Comments—This section presents a matrix of the parties that commented on the Draft EIR and the issues that they raised. This matrix is followed by each comment within the comment letter with a corresponding response.

Section IV, Mitigation Monitoring and Reporting Program (MMRP)—This section provides the full MMRP for the project. The MMRP lists all of the proposed mitigation measures by environmental topic, and identifies for each of the measures the applicable enforcement agency, monitoring agency, monitoring phase, monitoring frequency, and action indicating compliance.

Appendix A, Original Comment Letters—This appendix includes comment letters in the form that they were submitted.

Appendices 1 through 5—These appendices are technical appendices to the environmental analyses provided in Section II, Corrections and Additions, of this Final EIR.

A. PROPOSED PROJECT

The Buckley School, the Project Applicant, proposes to enhance its existing campus facilities, located at 3900 Stansbury Avenue in the Sherman Oaks Community of the City of Los Angeles. The Buckley School is an independent, co-educational school that currently enrolls approximately 750 students in kindergarten through grade twelve. The proposed Campus Enhancement Plan is intended to address the needs of existing and future school programs, including the provision of adequate teaching space for all educational levels, specialty teaching spaces, and multipurpose spaces for educational gatherings that cannot occur in a standard classroom. The project also provides for the modernization of existing facilities, improved disabled access, and energy efficiency upgrades. Included within the Campus Enhancement Plan are vehicular circulation and queuing improvements, increased parking within a new 240-space enclosed parking facility, the demolition of six buildings, construction of five new/replacement buildings, a central plant, and addition to and/or renovation of several existing buildings.[1] Upon completion, a net addition of approximately 69,500 square feet of building area would be provided, resulting in a total of 168,650 square feet of educational facilities within the project site.

Since publication of the Draft EIR, the School has evaluated a possible alternative construction phasing schedule in response to community input, in keeping with the community outreach efforts that have been a part of the project planning and design process dating back to 1997. Under this alternative construction schedule, construction of the project would still be completed in three primary phases over the course of approximately five years, spread out over an approximate six and a half year timeframe. However, under this scenario, Phase 2 of construction, as described in Section II, Project Description, of the Draft EIR, would precede Phase 1. This Final EIR includes an analysis of the impacts of the potential alternative construction schedule and incorporates the ensuing analysis into the environmental record, such that either construction phasing scenario may be implemented by the School upon approval of the project. As shown in Section II, Corrections and Additions, of this Final EIR, the environmental impacts of an alternative construction schedule would not be substantially different from those associated with the construction schedule contemplated in the Draft EIR, and neither construction schedule would be considered environmentally superior to the other.

Also since publication of the Draft EIR, the School has proposed a limited extension of project construction hours in response to community concerns regarding the duration of the

[1] *Under the project, a total of 306 parking spaces would be provided on-site, including 66 surface parking spaces provided throughout the campus.*

construction period and in an effort to ensure that the project is completed as expeditiously as possible. While construction days and hours would continue to be Monday through Friday, 7:00 A.M. to 5:00 P.M. and Saturday, 8:00 A.M. to 5:00 P.M. during the majority of the construction period, the School has proposed extended construction hours during two four-month periods of Phase 2 of construction, occurring outside of the regular academic year. During Phase 2, construction days and hours would be Monday through Friday, 7:00 A.M. to 5:00 P.M. each day from September 2nd to April 30th; Monday through Friday, 7:00 A.M. to 7:00 P.M. from May 1st to September 1st; and Saturday, 8:00 A.M. to 5:00 P.M. throughout the year. In addition, between May 1st and September 1st of Phase 2, once a building is fully enclosed, interior construction activities may continue until 9:00 P.M. on weekdays and 6:00 P.M. on Saturday. The extended hours during the summer months of Phase 2 would allow for additional construction time, as needed, to complete specific tasks, allow additional time to address unforeseen issues, and maintain the integrity of the overall construction schedule. This type of flexibility in the construction schedule would also permit construction crews to accomplish as much as possible during the summer months while school is not in session, which could in turn improve construction coordination and reduce traffic congestion when classes resume in the fall and a full student body is present on-site. As shown in Section II, Corrections and Additions, of this Final EIR, the environmental impacts associated with this limited extension in construction hours would not be substantially different from those associated with the construction hours contemplated in the Draft EIR.

Finally, as discussed below in Section II, Corrections and Additions, following publication of the Draft EIR, it was determined that a mechanical error in the automated 24-hour traffic counts collected at the Stansbury Avenue driveway on Wednesday, October 27, 2004, caused an anomaly within the School's existing trip count data.[2] This data was used as the basis for projecting the School's project trip generation rates and volumes, as well as the associated mitigation and self-imposed trip caps. The error resulted in an overstated vehicular trip count, which in turn caused an overestimation of existing daily trips, an overprojection of future project-related trips, and consequently an overstatement of residential street segment impacts. The data associated with the error has been corrected within this Final EIR, in consultation with and approval by LADOT.[3] Correction of this error would not result in the provision of any lesser level of mitigation than previously provided in the Draft EIR.

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[2] *This anomaly also could have been due to a possible typographical error. In any case, the error has been corrected herein.*

[3] *Refer to the traffic assessment letter provided by LADOT, dated July 11, 2007 and included within Appendix 3 of this Final EIR. (Note that LADOT's letter is incorrectly dated therein as June 11, 2007, but was actually issued on July 11, 2007.) Also refer to the technical letter therein which further explains the error, subsequent correction, and revised impact discussion.*

B. OVERVIEW OF THE PLANNING CONTEXT

The City of Los Angeles is the Lead Agency for the proposed project, pursuant to CEQA. This EIR has been prepared at the direction and under the supervision of the City of Los Angeles Department of City Planning in accordance with CEQA and the CEQA Guidelines, as amended.[4,5] An Environmental Assessment Form (EAF) and Initial Study were prepared. The Lead Agency subsequently made the determination that an EIR would be required.

The Buckley School Campus Enhancement Plan described herein has evolved from a planning and design process dating back to 1997 that has included extensive community input. The project has undergone numerous revisions over the years and the School has continued to work with the community to address their concerns while accommodating the School's educational needs. The Buckley School filed an application in 1997 for a new Conditional Use Permit (CUP) for the Campus Master Plan that would have increased student enrollment to 975 students. Processing of the plan was suspended in 1999, and it was withdrawn in 2001. In 2003, prior to submitting any formal applications to the City, The Buckley School presented a preliminary conceptual plan for new facilities to various community members. In response to community comments, The Buckley School made further refinements to its proposal. In August 2004, The Buckley School provided a revised proposal to the surrounding community. Subsequently, an EAF was filed with the City of Los Angeles for the proposed project, which reflected further refinements made to that revised proposal. In accordance with CEQA, an Initial Study was then prepared for the project and a Notice of Preparation (NOP) requesting comments to be considered in a Draft EIR was circulated from January 12, 2005, through February 11, 2005. A public Scoping Meeting to receive comments on the project was held on January 25, 2005. Comments received during the 2005 NOP circulation period and at the Scoping Meeting are included in Appendix A of the Draft EIR.

Most recently, in response to the plan described in the November 2004 EAF/Draft Initial Study and the NOP dated January 12, 2005, some members of the community expressed concerns particularly regarding construction impacts and soil export. In an effort to address such comments and reduce associated environmental impacts, the project has been revised. A new Initial Study was prepared for the project and an NOP requesting comments to be considered in a Draft EIR was circulated from February 10, 2006, through March 13, 2006. Comments received during this most recent NOP circulation period are included in Appendix B of the Draft EIR.

In accordance with Section 15121 of the State CEQA Guidelines, the purpose of this EIR (including the Draft EIR and this Final EIR) is to identify all potentially significant effects of the

[4] *Public Resources Code Sections 21000-21178.*

[5] *California Code of Regulations Title 14, Chapter 3, Sections 15000-15387.*

project on the physical environment, to determine the extent to which those effects can be reduced or avoided and to identify and evaluate feasible alternatives to the project as proposed. Agency decision-makers will then use this information to take appropriate action on the project. The EIR, in itself, will not determine whether the proposed project will be approved.

Based on the Initial Study, it was determined that implementation of the proposed project may, either by itself or in conjunction with past, present, and reasonably foreseeable future development in the vicinity, have significant effects in the following areas: Aesthetics; Air Quality; Biological Resources; Cultural Resources; Geology/Seismic Hazards; Hazardous Materials; Hydrology/Surface Water Quality; Land Use; Noise; and Transportation and Circulation. This EIR includes analysis of the above environmental topics. Mitigation measures are provided to reduce potentially significant impacts. In accordance with CEQA Guidelines Section 15128, the Initial Study for the project indicates the reasons that other possible effects of the project were determined not to be significant and are, therefore, not discussed in further detail in this EIR.

On November 2, 2006, the Draft EIR was circulated for a 45-day public review period, as required by CEQA. Copies of the original written comments received during the 45-day public review period are provided in Appendix A of this Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, the City of Los Angeles, as lead agency, has reviewed all comments received during the review period for the Draft EIR. Each of these written comments has been responded to within Section III, Responses to Written Comments, of this Final EIR. This Final EIR also reflects further refinements to the project proposal made in response to public comments and community concerns, as discussed within Section II, Corrections and Additions.

C. AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Potential areas of controversy and issues to be resolved by the City's decision-makers include those environmental issue areas where the potential for a significant unavoidable impact has been identified. These areas include aesthetics, air quality, noise, and traffic, all of which would be construction-related. Additional issues known to be of concern in the community include potential noise, traffic, and access impacts associated with operation of the project.

D. ALTERNATIVES TO REDUCE OR AVOID SIGNIFICANT EFFECTS

The City of Los Angeles and State CEQA Guidelines Section 15126.6 require that an EIR describe a range of reasonable alternatives, including a no project alternative that would feasibly attain most of the basic project objectives and would avoid or substantially lessen any of the significant environmental effects of the project. CEQA Guidelines state that only those

alternatives necessary to permit a "reasoned choice" are required to be set forth in order to foster meaningful public participation and informed decision making. Based on the analysis of alternatives, an environmentally superior alternative is designated. A complete analysis of alternatives to the project is provided in Section V of the Draft EIR.

The following alternatives to the proposed Buckley School Campus Enhancement Plan were evaluated in the Draft EIR and are summarized below: Alternative A—No Project/No Build Alternative; Alternative B—Alternative Use (All Residential) Alternative; Alternative C—Single Level Parking Facility Alternative; Alternative D—No Parking Facility Alternative; and Alternative E—Previous Project Alternative. A complete description of each alternative and the underlying assumptions made in defining them is provided in Section V of the Draft EIR.

Alternative A—No Project/No Build Alternative: The No Project/No Build Alternative assumes that the project would not be approved and no new development would occur within the project site. Thus, the physical and operational conditions of the School would remain as they are today.

Implementation of the No Project/No Build Alternative would not result in new environmental impacts, and overall would result in a reduced level of impact when compared to the project. Additionally, all of the significant and unavoidable impacts (i.e., construction-related aesthetics, air quality, noise, and transportation/circulation) associated with the proposed project would be avoided under this Alternative. Relative to the project objectives established in Section II, Project Description, of the Draft EIR, under the No Project/No Build Alternative, the vast majority of the objectives established for the project would not be attained, although most of the objectives pertaining to construction and minimization of impacts would be met to a greater degree as compared with the proposed project.

Alternative B—Alternative Use (All Residential) Alternative: Under the Alternative Use Alternative, the project would not be approved, The Buckley School would cease operations, and new development consisting of 11 large-scale single-family residences and related infrastructure such as roadways, utility lines, and related facilities would be introduced. All existing school facilities, including approximately 99,150 square feet of building area and the associated athletic field and play areas, would be demolished.

Implementation of this Alternative would result in similar or reduced environmental impacts for most issue areas as compared to the proposed project. While some issue areas would have greater impacts under the Alternative, none of the greater impacts would involve new significant impacts. Additionally, all of the significant and unavoidable impacts (i.e., construction-related aesthetics, air quality, noise, and transportation/circulation) associated with the proposed project would also occur under this Alternative. Relative to the project objectives established in Section II, Project Description, of the Draft EIR, the Alternative Use Alternative

would not achieve any of the project's educational objectives and would not meet many of the site planning objectives. Furthermore, this Alternative may not achieve many of the Community Plan and Specific Plan objectives to the extent that the proposed project would.

Alternative C—Single Level Parking Facility Alternative: The Single Level Parking Facility Alternative assumes that similar improvements to academic facilities proposed under the project would be implemented, along with the proposed increase in student enrollment. However, under the Single Level Parking Facility Alternative, the proposed Parking Facility would consist of a single enclosed level, which in combination with surface parking lots located throughout the campus would provide approximately 306 parking spaces on-site. The main campus entrance would be reconfigured to create a circular arrival plaza, similar to that proposed for the project, allowing for bus queuing as well as access to the Parking Facility. A few of the improvements to campus athletic facilities, school operations, and the site's aesthetic character that are proposed as part of the project would not be implemented under this Alternative. Maximum building heights under the Single Level Parking Facility Alternative would be 45 feet from existing grade, based on the LAMC definition of building height, and most of the approvals sought for the project would be required for this Alternative. Additionally, this Alternative would involve earthwork quantities similar to that of the project.

Implementation of the Single Level Parking Facility Alternative would result in similar environmental impacts for most issue areas as compared to the proposed project. While several issue areas would have greater impacts under the Alternative, none of the greater impacts would involve new significant impacts. Additionally, all of the significant and unavoidable impacts (i.e., construction-related aesthetics, air quality, noise, and transportation/circulation) associated with the proposed project would also occur under this Alternative. While CEQA requires that alternatives be defined in part based on their ability to avoid or reduce the significant impacts of a project, as discussed further in Section V, Alternatives, of the Draft EIR the Single Level Parking Facility Alternative has been included in response to community concerns regarding the proposed parking facility and building heights under the project.

Relative to the project objectives established in Section II, Project Description, of the Draft EIR, the Single Level Parking Facility Alternative would achieve most, but not all, of the project's educational objectives and all of the Community Plan and Specific Plan objectives. The Alternative would also meet most, but not all, of the project's site design and community objectives. However, several of the objectives that would not be met to the same extent as the project are considered crucial to the proposal, including containing all vehicle queuing and student drop-off/pick-up within the campus and respecting the residential character of the surrounding neighborhood.

Alternative D—No Parking Facility Alternative: The No Parking Facility Alternative assumes that the proposed project improvements to academic facilities at the Buckley School

would be implemented, along with the proposed increase in student enrollment. However, under the No Parking Facility Alternative, the proposed enclosed Parking Facility would not be developed as part of the Middle and Upper School Main Academic Center, and approximately 306 parking spaces would be provided on-site in surface lots located throughout the campus. In addition to changes in campus parking and internal circulation, several of the improvements to campus athletic facilities, school operations, and the site's aesthetic character that are proposed as part of the project would not be implemented under this Alternative. Maximum building heights under the No Parking Facility Alternative would be 45 feet from existing grade, based on the LAMC definition of building height, and most of the approvals sought for the project would be required for this Alternative. Additionally, this Alternative would involve earthwork quantities on-site similar to that of the project, plus approximately 15,815 cubic yards of soil import.

Implementation of the No Parking Facility Alternative would result in similar environmental impacts for most issue areas as compared to the proposed project. While several issue areas would have greater impacts under the Alternative, none of the greater impacts would involve new significant impacts. Additionally, all of the significant and unavoidable impacts (i.e., construction-related aesthetics, air quality, noise, and transportation/circulation) associated with the proposed project would also occur under this Alternative. While CEQA requires that alternatives be defined in part based on their ability to avoid or reduce the significant impacts of a project, as discussed further in Section V, Alternatives, of the Draft EIR the No Parking Facility Alternative has been included in response to community concerns regarding the proposed parking facility and building heights under the project.

Relative to the project objectives established in Section II, Project Description, of the Draft EIR, the No Parking Facility Alternative would achieve many, but not all, of the project's educational objectives and most of the Community Plan and Specific Plan objectives. The Alternative would meet many of the project's site design and community objectives, but due to its access, circulation, and parking configuration, would not achieve several important project objectives.

Alternative E—Previous Project Alternative: The Previous Project Alternative resembles a development proposal described in the November 2004 EAF/Draft Initial Study and the Notice of Preparation dated January 12, 2005. Like the proposed project, this Alternative would provide for new teaching space, specialty teaching spaces, and multipurpose spaces for educational gatherings that cannot occur in a standard classroom. The Alternative would also provide for the modernization of existing facilities, improved disabled access, seismic retrofits, and energy efficiency upgrades. The plan would involve the demolition, construction, expansion, and renovation of various buildings on-site (the Lower School buildings in particular), as well as vehicular circulation and queuing improvements and increased parking within a new semi-subterranean parking facility. Upon completion, a net addition of

approximately 53,750 square feet of building area would be provided, resulting in a total of 152,900 square feet of educational facilities within the project site. Additionally, a new two-level semi-subterranean parking facility would be constructed beneath the Lower/Middle School Classroom building, providing a total of 306 spaces on-site. Maximum building heights under the Previous Project Alternative would be 40 feet from existing grade, based on the LAMC definition of building height, and most of the approvals sought for the project would be required for this Alternative. Additionally, this Alternative would necessitate substantially more earthwork than the project, or specifically approximately 66,700 cubic yards of cut, 15,250 cubic yards of fill, and the export of approximately 51,450 cubic yards.

Implementation of the Previous Project Alternative would result in similar environmental impacts for most issue areas as compared to the proposed project, and reduced impacts for a few issue areas compared to the project. While several issue areas would have greater impacts under the Alternative, none of the greater impacts would involve new significant impacts. Additionally, most of the significant and unavoidable impacts (i.e., construction-related air quality, noise, and transportation/circulation) associated with the proposed project would also occur under this Alternative, with the exception of temporary aesthetic impacts during construction, which would be avoided under this Alternative. As previously mentioned, CEQA requires that alternatives be defined in part based on their ability to avoid or reduce the significant impacts of a project. While the Previous Project Alternative would reduce only a few of the proposed project's impacts, as discussed further in Section V, Alternatives, of the Draft EIR this Alternative has been included in order to provide an analytical comparison of the development proposal described in the November 2004 EAF/Draft Initial Study and January 12, 2005, NOP with the currently proposed project, which was defined in response to community concerns and input regarding the previous proposal. In particular, the project as currently proposed was developed in an effort to address public comments regarding construction impacts and soil export associated with the previous proposal and to reduce related environmental impacts.

Relative to the project objectives established in Section II, Project Description, of the Draft EIR, while the Previous Project Alternative would achieve all of the educational objectives, this Alternative would not achieve the site design and community objectives nor the Community Plan and Specific Plan objectives to the extent that the project would. Specifically, the objectives pertaining to construction and minimization of impacts would not be met under this Alternative.

Environmentally Superior Alternative: Of the Alternatives analyzed in the EIR, the No Project/No Build Alternative is considered the overall environmentally superior alternative as it would reduce the vast majority of the significant or potentially significant impacts occurring under the proposed project to no impact or levels that are less than significant. However, this Alternative would not meet most of the educational, site design, community, Community Plan or Specific Plan objectives established for the proposed project (although the objectives pertaining

to construction and minimization of impacts would be met to a greater degree as compared with the proposed project due to the absence of any construction activities under the No Project/No Build Alternative). In accordance with the CEQA Guidelines requirement to identify an environmentally superior alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that the Alternative Use Alternative would be environmentally superior. This Alternative would reduce more of the project impacts than any of the other remaining alternatives. Two of these reduced impacts, operational noise and operational traffic, would be less than significant without mitigation, as opposed to less than significant with mitigation as under the project. However, none of the project's significant and unavoidable impacts would be reduced or eliminated under this Alternative.

Under the Alternative Use Alternative, the Buckley School would cease operations and the site would undergo a major change in use and development. Thus, this Alternative would not meet the underlying purpose of the project, nor would it achieve any of the project's educational objectives. The Alternative Use Alternative also would not meet many of the site planning objectives, nor achieve many of the Community Plan and Specific Plan objectives to the extent that the project would. Regardless, the Alternative Use Alternative would be considered environmentally superior to any of the other alternatives evaluated in the Draft EIR.

E. SUMMARY OF PROJECT IMPACTS

1. AESTHETICS

a. Environmental Impacts:

(1) Visual Character

The project has been designed to make use of previously developed areas of the campus, integrating new structures with existing development and minimizing effects on the slopes of the canyon, the natural vegetation, and existing open space areas. Proposed development would be similar in terms of land use and site layout to the existing school campus, and the new building architecture would represent updated designs compatible with the existing building styles. The new buildings would have similar perceived heights (i.e., relative to finished grade) and similar roofline heights as existing development, and the massing of new square footage would be articulated to reduce the massing of structures. The proposed project also includes an extensive landscape plan designed to buffer campus development from the surrounding residences, promote a green campus complementary to the canyon, and enhance appreciation for the natural setting of the campus. Notable site features such as the existing Bell Tower would remain in place, and the existing turtle pond would likely be recreated near its current location as part of the project. In addition, the pole-mounted, changeable message sign located near the campus

exit was removed in July 2006, which was considered a beneficial impact relative to the visual character of the campus. Removal of the sign was planned as part of the project, but was expedited in response to neighborhood concerns. In summary, the project would not substantially alter the visual character of the campus or community, would not convert large areas of natural open space, would not create an inappropriate contrast between project elements and the area's valued aesthetic image, would not permanently remove existing valued visual features or elements, and would not present substantial inconsistencies with applicable goals and policies of the Community Plan. As such, project design would not conflict with or exceed the significance thresholds specified for aesthetic impacts. As such, the impact of the project itself (i.e., post-project conditions) on aesthetics would be less than significant.

Construction activities on-site would result in short-term changes in existing structures and exterior areas, causing a noticeable change in the site's appearance. Visible construction activities would include the removal of existing structures, site preparation and grading, construction of new structures, and installation of new utilities, amenities, and landscaping. During these activities, equipment and materials may be stored on-site, and temporary facilities, such as portable toilets and construction offices, may be used. The most noticeable visual change would be the temporary classroom bungalows (modular units) planned within the athletic field area, as well as in a small area immediately north of the Academic Building South, that would remain for approximately 18 months during construction of Phase 2 (primarily during the 2010–2011 school year).[6,7] Following their temporary use, the bungalows would be removed and the athletic field restored. Thus, proposed construction activities may result in a temporary aesthetic impact to nearby uses, particularly the residences to the west. While the evaluation of aesthetics is inherently influenced by a degree of subjectivity, to be conservative, it has been assumed that the introduction and use of the classroom bungalows would pose substantial temporary visual discord with the surrounding environment, resulting in a temporary significant aesthetic impact during construction.

(2) Views

The nature and quality of views from Mulholland Drive, a designated Scenic Parkway in the Mulholland Scenic Parkway Specific Plan, would not be negatively impacted by the project. Specifically, given the location of the project site within relatively level portions of the lower area of a canyon and the site's distance from Mulholland Drive, campus development would not

[6] *One modular unit would be located adjacent to the Academic Building South and would be used for food service during construction of Phases 1 and 2.*

[7] *Under the alternative construction schedule, additional modular units would be located on the site of the existing Milk House, as shown in Figure II-1 in Section II, Corrections and Additions, of this Final EIR. Under this construction scenario, the modular units would be used primarily during the 2009–2010 school year, for a total of approximately 18 months.*

obstruct views of the valley beyond or the mountains in the distance. The baseball diamond within the athletic field in the southern portion of the campus would continue to the most prominent site feature visible from Mulholland Drive, and the school buildings would continue to appear small and unobtrusive, situated among trees and landscaping. In general, the project would blend into the existing campus setting. Since proposed development would have similar building heights (in terms of rooflines), building scale, and architectural elements (e.g., courtyards and roof materials) as existing structures on-site and since additional landscaping would be provided throughout the campus, views of the site from a distance would not appear noticeably altered. No structures would abut or rise above Mulholland Drive, interrupt prominent ridgelines, or block views of other valued visual resources such as the San Fernando Valley and Santa Susana Mountains to the more distant north. As such, implementation of the Campus Enhancement Plan would not substantially obstruct a recognized or valued view currently enjoyed from the scenic corridor, and impacts would be less than significant.

Additionally, views of campus development, where available from locations within Fossil Ridge Park, would not change significantly. Such views would continue to be intermittent at best due to heavy vegetation throughout the park and as such, impacts would be less than significant. Furthermore, the nature and quality of views from local residential streets would not change substantially as a result of project implementation. New elements associated with the project would not substantially obstruct any recognized or valued view, and views of the site from a distance, in particular, would not appear noticeably altered. View impacts would be less than significant.

(3) Light and Glare

Implementation of the proposed project would not substantially increase ambient light levels on the project site and in the immediately surrounding vicinity. Project-related lighting would consist of low-level point light sources. All light would be directed inwards and downward with shielding as appropriate, in order to minimize light spillover. Additionally, the athletic field and recreational amenities in the southern portion of the project site would not be lit except for low-level security and exit lighting. Thus, the project would not introduce new sources of light, and impacts associated with lighting would be less than significant.

Glare effects also would not be expected to increase under the project. Glare reflected from parked vehicles on-site would be reduced with removal of the main northern surface parking lot and the introduction of enclosed structured parking. Additionally, the proposed building façade materials would generally be non-reflective. The only notable new source of glare would be the proposed swimming pool surface, which would be shielded by the associated Aquatic Center building and perimeter landscaped screening. Since the project would not include highly reflective surfaces, glare impacts would be less than significant.

(4) Regulatory Consistency

The proposed project would be generally consistent with applicable requirements set forth by the Mulholland Scenic Parkway Specific Plan (MSPSP), the MSPSP Design and Preservation Guidelines, and the Los Angeles Municipal Code (LAMC). The project would require a Specific Plan Exception for relief from the MSPSP to allow facility expansion and operation of an existing school use within the Specific Plan's Outer Corridor, as well as a Specific Plan Exception to allow some buildings heights to exceed the maximum 40 feet allowed within the Outer Corridor. The project also proposes a modification of the height regulations pursuant to LAMC §12.24F (discussed further in Section IV.H, Land Use, of the Draft EIR) to allow some building heights to exceed the maximum 36 feet permitted in a residential hillside zone. Approval from the Mulholland Scenic Parkway Design Review Board would also be required for the proposed outdoor Aquatic Center to be developed within the MSPSP area.

More specifically, the Specific Plan Exception for relief from the MSPSP to allow facility expansion and operation of an existing school use within the Outer Corridor would allow construction of the project. Insofar as school facilities currently exist within the Outer Corridor, the project would not represent a change in conditions. The approvals relating to buildings heights would be necessary since proposed building heights would range from approximately 18 feet up to a maximum of 55 feet. In essence, two proposed buildings, the Middle and Upper School Main Academic Center (maximum 55-foot height) and the Academic Building West (maximum 39-foot height), would exceed the 36-foot LAMC height limit and/or the 40-foot MSPSP limit for development within the Outer Corridor.[8] However, the Main Academic Center would visually appear no greater than 43.6 feet in height from most vantages due to the sloping nature of the site's topography and grade changes proposed as part of the project.[9] Similarly, the Academic Building West would visually appear no greater than 32 feet as measured from finished grade. All other proposed buildings would fall within the 36-foot height limit specified by the City's hillside requirements as well as the MSPSP 40-foot limit. In any case, nearly all of the new structures would have heights that are similar to existing building heights on-site. Furthermore, no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.[10] The proposed project would also be subject to provisions of the

[8] *In addition, two existing buildings (one of which would be removed as part of the project) have legally non-conforming building heights that exceed the maximum 36-foot height limit for a residential hillside zone set forth by LAMC §12.21A 17(c).*

[9] *A 55-foot maximum building height and the proposed changes in finished grade would be necessary to accommodate the project's excavated soils on-site in order to nearly eliminate the need for soil export or import.*

[10] *The Disney Pavilion is 38 feet in height. Given the sloping nature of the campus, the rooflines of all proposed buildings within the Main Academic Campus would fall below that of the Disney Pavilion, including those buildings with greater building heights which would be located at lower elevations. Due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights.*

City's Protected Tree Ordinance No. 177,404. The protected trees to be removed would be replaced at a ratio of three to-one trees in exceedance of the two-to-one tree replacement required by the Protected Tree Ordinance. With the requested approvals, the project would not present substantial inconsistencies with regulations applicable to aesthetics, and significant impacts would not occur.

Further analysis of impacts related to visual resources, views, and illumination is provided in Section IV.A, Aesthetics, of the Draft EIR.

b. Cumulative Impacts

None of the related projects are located adjacent to the project site or within the natural canyon in which the campus is situated. While potential mid- to high-rise structures in the surrounding area may be visible from vantage points within the project site or on adjacent roadways, due to the relatively flat topography of the valley to the north of the site and the urbanized nature of the area, the related projects will not likely be prominent in views from the site or the immediately surrounding area. None of the related projects is expected to appreciably alter the urban character of the area. Additionally, the related projects are located sufficiently distant from the project site so as not to increase ambient light levels in the immediate project area. In any case, each related project would be analyzed on a case-by-case basis to determine its impact on aesthetics, views, and light and glare. Furthermore, the project's impacts on aesthetics, views, and light and glare would be less than significant, with the exception of temporary aesthetic impacts during construction on-site. Overall, development of the related projects in the surrounding area, in combination with the proposed project, would result in a cumulative aesthetic impact on aesthetics and views that is less than significant.

c. Mitigation Measures

Mitigation Measure A-1: All open areas not used for buildings, driveways, parking areas, athletic facilities or walkways shall be landscaped and maintained to reduce visibility of the project improvements from adjacent residences in accordance with a Landscape Plan to be prepared by a licensed landscape architect to the satisfaction of the City Planning Department. Remaining existing natural landscape areas shall be retained and maintained in accordance with the landscape plan.

Mitigation Measure A-2: Nighttime lighting for use of the athletic field and outdoor courts shall be prohibited, except as required for low level security and exiting purposes.

d. Level of Significance After Mitigation

With implementation of the project features described above, the proposed project would not result in significant impacts relative to aesthetics, views, light or glare, with the exception of temporary aesthetic impacts during construction. Implementation of Mitigation Measures A-1 and A-2 above would serve to further reduce potential impacts. Construction impacts would be short-term, significant and unavoidable due to the perceived visual discord posed by the temporary classroom bungalows.

2. AIR QUALITY

a. Environmental Impacts

(1) Construction

The maximum regional emissions during construction activities would occur during Phase 2 construction of the new Middle and Upper School Main Academic Center building and enclosed Parking Facility. As detailed in Section IV.B, Air Quality, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, maximum regional construction emissions would not exceed the South Coast Air Quality Management District (SCAQMD) daily significance thresholds for Particulate Matter (PM_{10}), Carbon Monoxide (CO), Volatile Organic Compounds (VOC) or Sulfur Oxides (SO_X). However, maximum regional emissions would exceed the SCAQMD daily significance thresholds for Nitrogen Oxides (NO_X). Therefore, regional construction emissions resulting from the project would result in a significant short-term impact.

During construction, the unmitigated maximum daily localized emissions would not exceed the localized screening thresholds for CO or NO_X during any phase. However, the maximum localized emissions would exceed the localized screening thresholds for PM_{10} during site preparation activities for Phase 2. As such, construction activity would result in a short-term localized PM_{10} impact to sensitive receptors in close proximity to the project site, including students attending The Buckley School.

(2) Operation

To calculate regional emissions solely attributable to operation of the project, emissions from new vehicle trips associated with the project were combined with stationary emissions generated by additional building square footage associated with the project. Regional emissions resulting from operation of the project are expected to be well below the SCAQMD thresholds for all criteria pollutants. In addition, emissions may even be lower with implementation of the

Transportation Demand Management (TDM) Plan goal of achieving a zero net increase in vehicular trips.

With regard to local CO impacts, project-related traffic is not anticipated to result in any exceedances of the State one-hour CO standard of 20 ppm at the study intersection during the A.M., School P.M., or commuter P.M. peak periods. Similarly, eight-hour CO concentrations would remain below the State standard of 9 ppm. Since significant impacts would not occur at the intersections with the highest potential for CO hotspot formation, no significant impacts are anticipated to occur at any other locations in the project vicinity as a result of the proposed project, since the components yielding CO hotspots would not be greater than those occurring at the analyzed intersection.

The project does not include any uses identified by the SCAQMD as being associated with odors and as such would have no impact related to objectionable odors. In addition, the project is consistent with adopted air quality plans and polices and would not have a significant cumulative impact on air quality. Therefore, operation of the project following construction would not have a significant and unavoidable impact on air quality.

b. Cumulative Impacts

The SCAQMD's approach for assessing cumulative impacts is based on its Air Quality Management Plan (AQMP) forecasts for attainment of ambient air quality standards in accordance with the requirements of the Federal and State Clean Air Acts, taking into account the Southern California Association of Governments' (SCAG) forecasted future regional growth and determining whether the project is consistent with the forecasted future regional growth. Therefore, if all cumulative projects are individually consistent with the growth assumptions upon which the SCAQMD's AQMP is based, then future development would not impede the attainment of ambient air quality standards and a significant cumulative air quality impact would not occur. Cumulative air quality impacts for the project were evaluated in the context of Los Angeles County as a whole for the projected operational buildout year of 2014, consistent with the SCAQMD's methodology.

Based on the SCAQMD's methodology (presented in Chapter 9 of the CEQA Air Quality Handbook), a project would have a significant cumulative air quality impact if the ratio of daily project employee vehicle miles traveled to daily countywide vehicle miles traveled exceeds the ratio of daily project employees to daily countywide employees. An assessment of the project's cumulative impacts associated with the project is presented in Section IV.B, Air Quality, of the Draft EIR. As shown, the project employee-related rate of growth in vehicle miles traveled would not be greater than the project-related rate of growth in employment. In addition, cumulative traffic would not result in any local CO violations at the studied intersections. Therefore, the project would not have a significant cumulative impact on air quality

c. Mitigation Measures

The following mitigation measures set forth a program of air pollution control strategies designed to reduce the project's air quality impacts.

Mitigation Measure B-1: In addition to SCAQMD Rule 403 requirements, all land clearing/earth-moving activity areas shall be watered as necessary to remain visibly moist during active operations.

Mitigation Measure B-2: All construction roads internal to the construction site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite.

Mitigation Measure B-3: Streets shall be swept as needed during construction, but not more frequently than hourly, if visible soil material has been carried onto adjacent public paved roads.

Mitigation Measure B-4: Construction equipment shall be visually inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

Mitigation Measure B-5: Water three times daily or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.

Mitigation Measure B-6: Establish an on-site construction equipment staging area and construction worker parking lots, located on either paved surfaces or unpaved surfaces subject to soil stabilization.

Mitigation Measure B-7: Traffic speeds on all unpaved roads shall not exceed 15 mph.

Mitigation Measure B-8: All equipment shall be properly tuned and maintained in accordance with manufacturer’s specifications.

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

Mitigation Measure B-10: Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.

Mitigation Measure B-11: General contractors shall maintain and operate construction equipment such that exhaust emissions are minimized. For example, engines shall be turned off while in queues or while loading/unloading. In addition, heavy equipment and petroleum-powered generators shall be turned off when not in use.

Mitigation Measure B-12: Petroleum-powered equipment shall be turned off during second-stage smog alerts.

Mitigation Measure B-13: Develop a construction traffic management plan that includes, but is not limited to: (1) consolidating truck deliveries; (2) providing a rideshare or shuttle service for construction workers; and (3) providing dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

Mitigation Measure B-14: The project shall include energy-saving double-glazed windows in all new structures to the extent feasible.

Mitigation Measure B-15: Outdoor activities of children on-site and school scheduling shall be coordinated to prevent undue exposure of students to active demolition and site grading activities.

d. Level of Significance After Mitigation

(1) Construction

Implementation of the mitigation measures described above would reduce construction emissions for all pollutants. However, the project would remain in exceedance of the SCAQMD regional significance thresholds for NOx during the most intense construction period. As such, project construction would continue to result in a significant regional impact even with incorporation of all feasible mitigation measures.

Implementation of the mitigation measures described above would reduce localized PM_{10} emissions by 30 percent. However, the project would remain in exceedance of the SCAQMD localized significance threshold (LST) screening table threshold value for Phase 2 construction. Therefore, a refined localized analysis was conducted to determine the extent of the impact. The Industrial Source Complex Short Term (ISCST) model was run using the SCAQMD mandated 1981 meteorological data from the Burbank Monitoring Station and provided on the SCAQMD web site (www.aqmd.gov). As indicated in the model, construction-related PM_{10} levels would exceed the localized concentration increase threshold of 10.4 $\mu g/m^3$ during Phase 2 site preparation activities. The maximum localized PM_{10} concentration during Phase 2 activity would be located along Camino de la Cumbre with a concentration of 35.6 $\mu g/m^3$. The ISCST

modeled potential impacts are based on a set of conservative assumptions that incorporate worst-case 1981 SCAQMD mandated meteorological conditions and maximum daily PM_{10} emissions occurring every day throughout the entire modeled year. Therefore, if grading activities during Phase 2 occurred for the entire year, although they are expected to occur only for four months, at the maximum rate of activity, the model predicts that one day out of 365 days an off-site PM_{10} concentration could be as high as 35.6 $\mu g/m^3$.[11]

Actual construction activities on average would typically operate at a somewhat reduced level compared to the maximum predicted day and would have a corresponding reduction in pollutant emissions. Therefore, the modeled predicted set of conservative assumptions likely overstates the potential localized impacts, but is still concluded to remain significant and unavoidable even with incorporation of all feasible mitigation measures.

(2) Operation

During the operational phase, the project would not result in regional emissions that exceed SCAQMD significance thresholds for CO, NO_X, PM_{10}, and VOC. Project traffic during the operational phase of the project would not cause an exceedance of the State or federal standards and no significant impacts to local CO concentrations would occur. The project would also not result in any localized impacts related to air toxic emissions as the School is limited to small sources of air toxic emissions (e.g., consumer products and diesel particulates from school buses) and no substantial sources of air toxic emissions are near the School that could significantly impact sensitive receptors at or near the project site. The project does not include any uses identified by the SCAQMD as being associated with odors and as such would have no impact related to objectionable odors. In addition, the project is consistent with adopted air quality plans and policies and would not have a significant cumulative impact on air quality. Therefore, operation of the project following construction would not have a significant and unavoidable impact on air quality.

3. BIOLOGICAL RESOURCES

a. Environmental Impacts

The proposed project would generally be constructed within areas of the site that are currently developed and/or landscaped. Based on the review of relevant literature, the review of

[11] *As discussed in Section II, Corrections and Additions to the Draft EIR, the extended construction hours during the Phase 2 summer periods would slightly reduce this predicted concentration from 35.6 $\mu g/m^3$ to 32.4 $\mu g/m^3$ since emissions would be spread out over a greater period of time, allowing for greater dispersion. The combined effects of extended construction hours and implementation of the alternative construction schedule would also slightly reduce the predicted concentration presented in the Draft EIR.*

data on sensitive habitats and species in the region (e.g., the California Natural Diversity Database (CNDDB)), the presence of a limited amount native vegetation within the area to be developed, the location of proposed development within currently developed areas, and the abundance of non-native ornamental landscaping, the project would not result in the loss of wildlife individuals, or the reduction of existing habitat, of a local, State or Federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern. In addition, given the general lack of sensitive species on the project site and the existing developed nature of the site, the proposed project would not interfere with habitat use (directly or indirectly) such that normal species' behaviors are disturbed to the degree that may diminish the chances for long-term survival of a sensitive species. Thus, such impacts would be less than significant.

During site visits conducted for the project, PCR biologists examined the project site for evidence of streams and an ordinary high water mark (OHWM), saturation, and/or wetland vegetation. Three drainages were found within the immediate vicinity of the site that would be considered under the jurisdiction of the Army Corps of Engineers (ACOE) and California Department of Fish and Game (CDFG). These areas support 0.01 acre of ACOE "Waters of the U.S." and 0.14 acre of CDFG "Waters of the State," but do not support wetlands. Construction of the proposed project would not extend over any of the ACOE jurisdictional "Waters of the U.S." or the CDFG jurisdictional streambed and associated riparian habitat. Therefore, no impacts to these jurisdictional waters would occur. No wetlands were observed on-site, therefore no impacts will occur to wetland habitat.

The project site occurs within an area that supports local wildlife movement for more ubiquitous, development-adapted species and is known to support mule deer on the slopes in the eastern and southern portions of the project site. These species likely utilize the native habitat for foraging and for cover. However, the project site would not support regional north-south or east-west movement between larger habitat areas due to the presence of dense urban development north of the project site and residential development east and west of the project site. Furthermore, since the proposed project is occurring within already developed areas of the current campus, the proposed project is not expected to interfere with wildlife movement or migration corridors such that the chances for long-term survival of any species, sensitive or otherwise, would be diminished. Thus, potential impacts to wildlife corridors would be less than significant.

A total of 80 trees will be directly impacted by the proposed project as detailed in Table IV.C-6, *Tree Impacts*, and shown in Figure IV.C-5, *Tree Impacts*, both amended and included in Appendix 4 of this Final EIR. These trees would require removal and include up to 28 native trees (eight coast live oak trees, and 20 California walnut trees) and 52 non-native trees. None of the 80 trees proposed for removal are recommended for transplanting. A total of 37 trees will be partially impacted by the proposed project, including 21 native trees (nine coast

live oak trees, 11 California walnut trees, and one California sycamore tree) and 16 non-native trees.[12,13] These trees would not be removed, but may require protective measures during construction. An additional 36 trees, as detailed in the Tree Survey Report, would also potentially be impacted but not to a point that the tree would need to be removed. These include 19 native trees (7 coast live oak, 11 California walnut trees, and 1 California sycamore) and 17 non-native trees. As discussed in the Tree Survey Report, 29 native trees within the survey area and 75 non-native trees within the survey area would be avoided by the proposed improvements. The mitigation measures provided below will ensure that the 73 partially and potentially impacted trees are protected during construction. With implementation of the mitigation measures provided below, impacts to protected trees would be reduced to less than significant levels.

The study area supports many trees which could be used by breeding raptors and songbirds. Nesting activity typically occurs from February 15 to August 31. To protect nesting birds regulated by the Migratory Bird Treaty Act (MBTA), efforts will be made to schedule all removals between September 1 and February 14 to avoid the nesting season. In addition, the mitigation measure provided below would ensure that impacts to nesting birds would be less than significant.

b. Cumulative Impacts

The related projects listed in the Draft EIR would generally consist of infill development. Therefore, biological resources would not be impacted to a measurable degree as such work would largely occur on previously disturbed land. Related projects would be analyzed on a case-by-case basis for their impacts to native trees, including oak trees, pursuant to City of Los Angeles Protected Tree Ordinance. Thus, no significant cumulative impact to biological resources would occur.

c. Mitigation Measures

Mitigation Measure C-1: Trees removed that are protected by the City of Los Angeles Protected Tree Ordinance shall be replaced within the property by at least two trees of a protected variety including valley and coast live oak, or any other tree of the quercus genus (excluding scrub oak), the California Walnut, the California sycamore, and the California bay. Each replacement tree shall be a 15-gallon, or larger specimen in size, measuring one inch or more in diameter at a point one foot above the base, and not less than seven feet in height

[12] *Partially impacted trees include trees which may be impacted within the 5' buffer zone of the tree canopy.*

[13] *Fewer trees would be impacted if the Aquatic Center is developed at the current outdoor basketball and weight facility located at the northeast corner of the athletic field.*

measured from the base. The size and number of replacement trees shall approximate the value of the tree to be replaced.

Mitigation Measure C-2: All construction work potentially impacting any protected tree shall be approved by, performed under the supervision of, and inspected by a tree expert as defined by the City of Los Angeles Protected Tree Ordinance. This tree expert shall also oversee all maintenance work on the protected trees including irrigation, pruning and spraying.

Mitigation Measure C-3: Ongoing during construction, the construction supervisor shall ensure that all construction employees are fully informed of the tree protection practices. This shall include information on the tree protection zone, the necessity of preventing damage, and the discussion of work practices that will accomplish such.

Mitigation Measure C-4: Ongoing during construction, six-foot-high, brightly colored construction fencing shall be erected along the construction side of partially and potentially impacted native trees to delineate the tree protection area. The protective fence shall be installed 5 feet outside of the tree's drip line, if possible. If construction is to occur within the drip line, the fencing shall be installed 12 inches inside the new footing or trenching line.

Mitigation Measure C-5: Due to some sizeable trees and shrubs occurring within and adjacent to the Site, removal of any large trees and large branching shrubs shall take place outside of the nesting season (February 15-August 31) in accordance with the MBTA. If such removal activities must occur during the nesting season, a biological monitor shall be present during the removal activities to ensure that no active nests will be impacted. If active nests are found, a 200-foot buffer radius (500 feet for raptors) shall be established until the fledglings have left the nest or it has been determined that the nest has failed.

d. Level of Significance After Mitigation

With incorporation of the mitigation measures outlined above, no significant impacts to biological resources would occur as a result of the proposed project.

4. CULTURAL RESOURCES

a. Environmental Impacts

A records search by the Southern Central Coast Information Center (SCCIC) at California State University Fullerton indicates that deep excavations or any type of construction-related activities in the bedrock may result in a high probability of encountering remains of fossil marine vertebrates. Therefore, as excavation and construction into the bedrock may be required, implementation of the project does have the potential to result in significant adverse impacts associated with the permanent loss of, or loss of access to, a paleontological resource. However, with implementation of the proposed mitigation measures presented below, potential impacts would be reduced to less than significant levels.

b. Cumulative Impacts

From a cumulative impact perspective, grading and excavation activities associated with the project in combination with other related projects in the project vicinity could contribute to the progressive loss of fossil remains, as-yet unrecorded fossil sites, associated geologic and geographic site data, and fossil-bearing strata. However, as described below, with implementation of the proposed mitigation measures, project impacts would be less than significant. It would also be expected that other related projects would implement such mitigation measures on a case-by-case basis if deemed appropriate as part of their environmental review. Thus, with implementation of the mitigation measures listed above, cumulative impacts associated with paleontological resources would be less than significant.

c. Mitigation Measures

Mitigation Measure D-1: A qualified paleontologist shall be retained by the Applicant and approved by the lead agency to oversee and carryout the mitigation measures stipulated in this EIR. The services of the paleontologist shall be secured by contacting the Natural History Museum of Los Angeles County.

Mitigation Measure D-2: Prior to the start of constructed-related activities, construction personnel involved with earth-moving activities shall be informed by the paleontologist of the potential for encountering significant paleontological resources, instructed on the proper notification procedures when such an encounter occurs, and taught how to identify fossils and other potential resources. This shall include the provision of written materials to familiarize personnel with the range of resources that might be expected, the type of activities that may result in impacts, and the legal framework of paleontological resources protection. Construction personnel shall also be informed that unauthorized collection of fossil resources is prohibited.

Mitigation Measure D-3: Prior to the start of construction, the paleontologist shall conduct a field survey of exposures of sensitive stratigraphic units within the construction site(s) that will be disturbed by excavation and construction activities such as drilling and/or pile driving. Earth-moving construction activities at depths determined by the paleontologist to be sensitive will be periodically monitored where such activity may disturb or encounter bedrock material of the marine Late Miocene Modelo Formation (Monterey Formation). The frequency of monitoring efforts will be based on consultation with the paleontologist and will depend on the rate of excavation and grading activities; the type of construction-related activities, such as foundation pile driving/drilling; the materials being excavated; and if found, the abundance and type of fossils encountered. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. Monitoring will not be conducted in areas where grading, excavation, and/or construction activities will not occur or in areas where exposed sediment will be buried, but not otherwise disturbed.

Mitigation Measure D-4: If a potential fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage.

Mitigation Measure D-5: At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

Mitigation Measure D-6: Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository.

Mitigation Measure D-7: Any fossils collected should be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository.

Mitigation Measure D-8: Following the completion of the above tasks, the paleontologist shall prepare a report documenting the absence or discovery of fossil resources on-site. If fossils are found, the report shall summarize the results of the monitoring program, identify those fossils encountered, recovery and curation efforts, and the methodology used in these efforts, as well as describe the fossils collected and their significance. The report shall be submitted by the Applicant to the lead agency, the Natural History Museum of

Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and the required mitigation measures.

Level of Significance After Mitigation

The proposed paleontological resource mitigation measures would reduce, to a less than significant level, the direct, indirect, and cumulative adverse environmental impacts on paleontological resources that could result from project-related construction activities. Therefore, with implementation of the mitigation measures above, no significant unavoidable adverse paleontological impact is anticipated as a result of the proposed project.

5. GEOLOGY

a. Environmental Impacts

The nearest potentially active fault to the project site is the Santa Monica-Hollywood Fault located approximately 4.2 miles south of the site. As stated in the 1997 Uniform Building Code (UBC), the faults located nearest to the project site are classified as Type "B" faults.

The principal seismic hazard at the project site is strong groundshaking from earthquakes produced by local faults. Modern buildings are typically designed to minimize or eliminate safety risks associated with groundshaking, such as through the use of shear panels and reinforcement. Nonetheless, similar to other developments throughout Southern California, implementation of the project would result in exposure of people on-site to a degree of seismic hazard risk associated with groundshaking. Construction in accordance with UBC and LAMC requirements would minimize such risks. In addition, the project would be constructed in accordance with the specific recommendations provided in the Geologic and Geotechnical Engineering Report, which is included as Appendix F. Thus, potential impacts associated with groundshaking would be reduced to the extent possible and would be less than significant.

The project site is not included within an area identified by the California Geologic Survey (CGS) or the City of Los Angeles as potentially containing liquefiable material. Due to the lack of a high groundwater table and the presence of fine-grained materials, the project site is not subject to liquefaction. Therefore, no significant impacts associated with liquefaction would occur.

With regard to landslides, site conditions are grossly stable from a geologic standpoint, and the natural slopes on-site do not exhibit signs of surficial slope failure. Furthermore, the project would implement site-specific geotechnical recommendations (provided in Appendix F)

to ensure adequate slope stability. Therefore, potential impacts associated with seismically induced landsliding would be less than significant.

The project site is not located in the immediate vicinity of any large bodies of water. Accordingly, the potential for seiches or tsunamis at the site is low. Therefore, the proposed project would not be subject to the effects of seiches and tsunamis, and no significant impacts would occur.

The project site is located within approximately 1.5 miles of the Upper Stone Canyon Reservoir to the southwest. However, the project site is not located within its path of inundation. As such, the potential for seismically induced flooding to occur at the site is considered low. Therefore, the proposed project would not be subject to seismically induced flooding, and no significant impacts would occur.

The potential for subsidence to affect new development on-site is low and should not affect those areas of the site where development has or will occur on compacted fill. Therefore, no significant impacts associated with subsidence would occur. Additionally, the expansion potential of the fill on the project site was determined to be in the very low to low range. Therefore, no significant impacts associated with expansive soils would occur.

One notable area proposed for cut and fill operations, along the existing access road through campus that would become a central pedestrian walkway/fire access route as part of the project, currently contains uncertified fill and alluvium over bedrock. Due to the depth of the existing fill and the presence of a public storm drain, it is not feasible to remove and re-compact the existing fill prior to raising the grade in this area. As such, a Building Code modification would be necessary in order to place new fill over the uncertified fill. Any permanent structures located over areas of uncertified fill would be founded on piles and derive support entirely from underlying bedrock, and as such, no permanent structures would be supported by uncertified fill.

As discussed in detail in Section IV.E, Geology of the Draft EIR, heavy rainfall in early 2005 caused mudslides above Camino de la Cumbre (immediately west of and upslope from the campus). Mud and debris from these mudslides crossed the roadway and came to rest on the chain link fence along the School's property boundary. To prevent future occurrences such as these, the Geologic and Geotechnical Engineering Report recommends erosion control for those areas where concentrated off-site flows can carry mud and water onto the project site. As the School has no control with regard to maintaining adequate off-site drainage, off-site mudslides above Camino de la Cumbre could potentially reoccur. However, with the School's previous construction of the small berm and block wall, mudslide impacts to the project site itself would be less than significant.

Overall, the Geologic and Geotechnical Engineering Report concluded that construction of the proposed project is feasible from a geologic and soils engineering standpoint, provided that the standards and recommendations in the report are incorporated in the project plans and are implemented during construction. With implementation of the recommendations provided in the geotechnical report, as well as adherence to all applicable regulatory requirements, including the City's permitting and construction inspection procedures, project impacts relative to soil stability would be less than significant.

With regard to landform alteration, the project has been specifically designed so that grading would occur primarily on previously developed or graded areas. Thus, the project would not significantly modify the existing topography or the adjacent hillsides. With the incorporation of the project design features and additional site-specific geotechnical recommendations, the proposed project would not destroy, permanently cover, or materially or adversely modify a prominent geologic or topographic feature. Therefore, project implementation is not anticipated to result in significant impacts associated with landform alteration.

With regard to sedimentation and erosion, since the project would require cut and fill, soil erosion could potentially occur on-site. Specifically, grading, excavation, and other earth-moving activities could expose site soils to wind- or water-generated erosion. However, as described in Section IV.G, Hydrology, of the Draft EIR, best management practices (BMPs), which would reduce and/or eliminate erosion potential, would be utilized as part of project development. As such, impacts associated with hazards from erosion would be less than significant.

With regard to mineral resources, according to the CGS, no mineral resources or important aggregate resources are located within the project site boundaries or in the project area. As such, no impacts to mineral resources would occur as a result of the project.

b. Cumulative Impacts

Impacts associated with geologic issues are generally associated with a specific project site or a particular localized area. None of the related projects are located within the immediate vicinity of the project site. Thus, cumulative geologic impacts resulting from the project and other related projects would not occur. Cumulative development in the area would, however, increase the overall potential for exposure to seismic hazards by potentially increasing the number of people exposed to seismic hazards. However, all projects are required to comply with State and local regulations regarding seismic hazards. Adherence to these applicable building regulations and standard engineering practices would ensure that cumulative impacts would be less than significant.

c. Mitigation Measures

Mitigation Measure E-1: The Applicant or its contractor shall incorporate the recommendations detailed in the geotechnical investigation prepared for the proposed project, as approved by the City of Los Angeles. (Geotechnical recommendations regarding general findings, the proposed swimming pool, foundation design, retaining walls, floor slabs, paving, drainage, waterproofing, plan review, site observations during construction, and construction site maintenance are provided on pages 13 through 22 of the Geologic and Geotechnical Engineering Report, prepared by The J. Byer Group, Inc. provided in Appendix F of the Draft EIR.)

d. Level of Significance After Mitigation

With implementation of the proposed mitigation measure, significant impacts associated with geology and seismic hazards would not occur as a result of the proposed project.

6. HAZARDS AND HAZARDOUS MATERIALS

a. Environmental Impacts

Construction of the proposed project may involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, cleaning agents, and pesticides for landscaping purposes. These and all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturer's instructions. Therefore, impacts from the use of these hazardous substances during construction would be less than significant.

Nominal quantities of hazardous substances are currently used at the project site. These substances are associated with the operation and maintenance of buildings, surrounding landscape, basketball court, baseball field and the swimming pool, and operation of the science and art classes and print shop. The Phase I Environmental Site Assessment determined that the use of such hazardous substances is not an environmental concern. The use, storage, and disposal of all potentially hazardous materials would continue to be conducted in small quantities and in accordance with applicable laws and regulations and manufacturer's instructions for such products. Therefore, impacts associated with the use of these hazardous substances during operation would be less than significant.

Asbestos Containing Material (ACM) has been identified in the buildings located at the project site. As such, the demolition of or modifications to any of these buildings would have the potential to release asbestos fibers into the atmosphere if they are not properly stabilized or

removed prior to demolition activities. However, compliance with the regulatory framework (SCAQMD Rule 1403) would reduce potential impacts to a less than significant level.

Lead-based paints are known to be present in some limited areas of the school. However, the project would comply with Federal Occupational Safety and Health Administration (OSHA) Regulations (Title 8 CCR Section 1532.1 and 29 CFR 1926.62) for construction work involving potential lead exposure. Additionally, a mitigation measure is proposed to ensure that lead-based paint removal would be conducted by a certified lead containment contractor in compliance with applicable laws. Compliance with the regulatory framework and the mitigation measures below would ensure that impacts associated with removal of such materials would be less than significant.

A geophysical survey confirmed the presence of an anomaly that appears to be a waste oil Underground Storage Tank (UST) at the site of the former bus maintenance garage located near the Transportation Building. Any UST and associated piping and contamination encountered during construction would be removed prior to or during construction in compliance with applicable regulatory requirements under the oversight of the Los Angeles Fire Department (LAFD) and/or the Regional Water Quality Control Board (RWQCB). Compliance with such regulatory requirements as set forth in the mitigation measure below would reduce potential impacts to a less than significant level.

Recent soil sampling below a former 10,000-gallon gasoline UST removed from the surface parking area to the southwest of the science building revealed a concentration of methyl tert-butyl ether (MTBE) in one sample 20 feet below grade that exceeded the SSL. The Site Assessment Report recommends that no further action is required in regards to the former UST based on the impermeable soil lithology of the area and the distance from the soil contamination to the groundwater. It has been requested that RWQCB maintain case closure. In the event that MTBE impacted soils are encountered, compliance with the mitigation measures below would ensure that any potential impacts would be less than significant.

Emergency access to the site would continue to be provided via Stansbury Avenue and Camino de la Cumbre. In addition, emergency access within the site would be provided through the central portion of the site via the project's proposed pedestrian walkway, which would be maintained as a 20-foot clear Fire Department access route to accommodate emergency vehicles. The new arrival plaza and parking facility would improve access to the site and eliminate queuing along Stansbury Avenue, which in turn would facilitate the movement of emergency vehicles. In addition, new wrought iron gates would be installed at the Stansbury Avenue and Camino de la Cumbre entrances, with the latter recessed by approximately 20 feet to reduce conflicts associated with an existing blind curve at the driveway. In the event that evacuation of the entire campus is required, emergency evacuation procedures would be undertaken by the School. As part of these procedures, only emergency vehicles would be allowed on/off campus

and parents would pick up their children at the off-campus evacuation site at Van Nuys-Sherman Oaks Park on Huston Street, with an alternative evacuation area at the surface parking lot on Hazeltine and Ventura Boulevard. Under these circumstances, a disaster situation broadcast system would be used to notify parents of evacuation procedures. Specifically, the School contracts with an out-of-state emergency broadcast system that if activated sends out a message about evacuation details and the designated off-site meeting location. To initiate this system, phone contact is made by the School (by cell phone or a land line with battery back up power) to record an emergency message, then the message is sent by the provider to all home, work, and cell phone numbers listed with the School for parents, faculty, and staff. The School's emergency evacuation plan would be subject to LAFD review and approval. The plan shall be included in the Department of City Planning file for the project and distributed to the applicable City Council District Office, Sherman Oaks Homeowner's Association, Sherman Oaks Neighborhood Council, and a list of neighbors mutually agreed upon with the Sherman Oaks Homeowner's Association (SOHA), including all homes on Stansbury Avenue south of Ventura Boulevard. Thus, impacts associated with emergency access would be less than significant and no mitigation measures would be required.

b. Cumulative Impacts

All development located within the vicinity of the project site would be subject to the same local, regional, State, and Federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, the simultaneous development of the proposed project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials.

c. Mitigation Measures

Mitigation Measure F-1: Prior to demolition of any structure, the project Applicant shall abide by the requirements of SCAQMD Rule 1403 for asbestos-containing materials (ACMs).

Mitigation Measure F-2: Removal of ACMs shall be performed by a certified asbestos containment contractor prior to demolition.

Mitigation Measure F-3: Removal of lead-based paints during demolition shall be performed by a certified lead containment contractor in compliance with applicable laws.

Mitigation Measure F-4: Prior to or at the time that development of improvements in the vicinity of the potential UST within the former bus maintenance garage area occurs, the potential UST and any associated piping and contamination

shall be investigated and removed and/or remediated in compliance with applicable regulatory requirements.

Mitigation Measure F-5: Any contaminated soil, subsurface features, or groundwater discovered during excavation and grading shall be evaluated and excavated/disposed of, treated in-situ or otherwise managed in accordance with the applicable regulatory requirements. If contamination is discovered during grading activities, grading within such an area shall be temporarily halted and redirected until the appropriate evaluation and response measures are implemented so as to render the area suitable for grading activities to resume.

Mitigation Measure F-6: Any contaminated soils that may be stockpiled on-site shall be stored in a manner such that underlying soils are not cross-contaminated using such measures as heavy-duty plastic sheathing under or on top of the stockpiled soil or other suitable methods. In addition, all stock-piled materials shall be protected to prevent material from being washed into the storm drains using such methods as use of sand bags around the material or other suitable methods. The management, treatment or disposal of all contaminated soils shall comply with all applicable federal, state, and local regulations related to hazardous waste.

d. Level of Significance After Mitigation

All potentially significant impacts would be less than significant with implementation of the mitigation measures outlined above.

7. HYDROLOGY

a. Environmental Impacts

(1) Construction

Project construction would involve an estimated 20,341 cubic yards (cy) of cut material and an estimated 19,503 cy of fill, with nominal (i.e., less than 1,000 cubic yards) of soil import and/or export for a nearly balanced site in terms of earthwork. As such, exposed soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site water activities to reduce airborne dust could contribute to pollutant loading in storm water runoff. However, the project would be required to obtain a National Pollutant Discharge Elimination System (NPDES) general construction permit. In accordance with the requirements of the permit, the project would implement a Storm Water Pollution Prevention Plan (SWPPP), which would specify BMPs and erosion control measures to be used during construction to

prevent storm water pollution. Such BMPs would eliminate or reduce pollutant levels in storm water runoff during construction. Thus, with compliance of SWPPP guidelines including implementation of BMPs as set forth in the Hydrology Study, construction-related impacts to hydrology and surface water quality would be less than significant.

(2) Operation

Project implementation would result in an approximate 14.6 percent increase in impervious area. Currently, the project site has a pre-project storm water runoff flow of 51.68 cfs during a 50-year storm event. Based on the Hydrology Study, the project's increase in impervious area would result in a post-development storm water runoff flow of 52.27 cfs, which represents a modest 1 percent increase in flow. The increase in flow would result in an estimated post-project discharge of 280 cfs and 377 cfs for the 51-inch line and the 57-inch line, respectively. Based on the maximum hydraulic capacity calculated for these pipes, the existing lines serving the site have available capacity to accommodate post-project flows. In addition, new minor drainage improvements such as new and/or modified swales, gutters, or drainage pipes would be provided on-site to ensure the proper flow of surface water to the 51-inch main line. Thus, the project's impacts on hydrology would be less than significant.

b. Cumulative Impacts

The 29 related projects in the project vicinity could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff, resulting in cumulative impacts to hydrology and surface water quality. However, as with the proposed project, all of the related projects would also be subject to State NPDES permit requirements for both construction and operation. Each project would be required to develop SWPPPs and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to surface water quality. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to assure that sufficient local and regional drainage capacity is available. Furthermore, none of the related projects are located within the project's watershed. Thus, cumulative impacts to hydrology and surface water quality would be less than significant.

c. Mitigation Measures

The proposed project would be subject to the regulatory requirements described above, including preparation of a SWPPP and compliance with the City's Standard Urban Storm Water Management Plan (SUSMP) requirements. Compliance with these requirements is mandated by law to ensure that impacts to hydrology and surface water quality are reduced to less than significant levels. As the proposed project is not anticipated to result in any significant impacts to hydrology and surface water quality, no mitigation measures would be required.

d. Level of Significance After Mitigation

Impacts to hydrology and surface water quality would be less than significant; therefore, no mitigation measures would be required.

8. LAND USE

a. Environmental Impacts

(1) Consistency with Local Plans and Applicable Policies

The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan designates the majority of The Buckley School campus for Minimum Density Residential uses, with a small portion of the campus located immediately east of Camino de la Cumbre designated for Very Low Residential uses. Continued use of the project site for school purposes would be consistent with the designated land use designations, as the corresponding RE-40 zone (discussed below) permits school uses by Conditional Use Permit (CUP). The Community Plan also includes a notation that private elementary school, junior high, and senior high school uses occur at this site; the project would not change the existing private school use at the site and thus would be consistent with the school notations for the property. Relative to the general issues addressed in the Community Plan, the School would continue to operate within the existing campus and the project would not physically divide or interfere with the surrounding residential community; thus, the existing land use relationships in the area as well as the overall character of the neighborhood would be preserved. The project would be generally consistent with the land use policies in the Community Plan and would specifically support those policies pertaining to schools, namely promoting compatibility in school locations, site layout and architectural design with adjacent land uses and community character and expanding an existing school rather than developing a new site. As such, the project would be consistent with the Community Plan.

The project site is zoned RE40-1-H (Residential Estate, Height District 1, Hillside) by the City of Los Angeles Planning and Zoning Code. The proposed project would not exceed the development standards specified for this zone. Specifically, the floor area ratio of The Buckley School campus, at approximately 0.21:1, would be substantially less than the 3:1 permitted FAR. As indicated above, private schools are permitted within the RE-40 zone by CUP, through which design and/or operational conditions may be imposed and enforced by the City. The Buckley School currently operates pursuant to CUP No. 17967, which permits a maximum enrollment of 750 students. The proposed Campus Enhancement Plan would require a new CUP for The Buckley School in order to allow a maximum enrollment of 830 students by the 2014–2015 school year, plus up to eight additional faculty members and up to eight other additional staff to accommodate student enrollment. Additional changes in School operating conditions would be permitted under the provisions of the new CUP, as detailed in Section IV.H, Land Use, of the

Draft EIR as well as Section II, Corrections and Additions, of this Final EIR. With approval of the proposed CUP, the project would comply with applicable zoning requirements.

In addition, the project proposes a modification of the height regulations pursuant to LAMC §12.24F to allow building heights up to a maximum of 55 feet. Two proposed buildings, the Middle and Upper School Main Academic Center (maximum 55-foot height) and the Academic Building West (maximum 39-foot height), would exceed the 36-foot maximum height limit pursuant to LAMC §12.21A 17(c).[14] However, the Main Academic Center would visually appear no greater than 43.6 feet in height from most vantages due to the sloping nature of the site's topography and grade changes proposed as part of the project.[15] Similarly, the Academic Building West would visually appear no greater than 32 feet as measured from finished grade. All other proposed buildings would fall within the 36-foot height limit specified by the City's hillside requirements. In any case, nearly all of the new structures would have heights that are similar to existing building heights on-site. Furthermore, no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.[16] With the approval of the height modification pursuant to LAMC §12.24F, the project would be consistent with applicable height regulations of the LAMC.

The project would also require modification of the height regulations pursuant to LAMC §12.24F to allow landscaping, hedges and fences/gates/walls up to 10 feet in height within the required yards at the Stansbury Avenue and Camino de la Cumbre entrances in lieu of the maximum three and one-half feet otherwise permitted in the front yard and six feet otherwise permitted in the side yard in a hillside zone pursuant to LAMC §12.22C 20. With approval of this height modification, the project would also be consistent with applicable regulations of the LAMC.

The Mulholland Scenic Parkway Specific Plan (MSPSP) includes regulations for development and use of properties within the Outer Corridor; these regulations apply to project sites, such as the Buckley campus, when all or a portion of the lot to be developed is located within the Outer Corridor. With regard to land use, the project requests a Specific Plan Exception for relief from the MSPSP requirements in order to allow the continued

[14] *In addition, two existing buildings (one of which would be removed as part of the project) have legally non-conforming building heights that exceed the maximum 36-foot height limit for a residential hillside zone set forth by LAMC §12.21A 17(c).*

[15] *A 55-foot maximum building height and the proposed changes in finished grade would be necessary to accommodate the project's excavated soils on-site in order to nearly eliminate the need for soil export or import.*

[16] *The Disney Pavilion is 38 feet in height. Given the sloping nature of the campus, the rooflines of all proposed buildings within the Main Academic Campus would fall below that of the Disney Pavilion, including those buildings with greater building heights which would be located at lower elevations. Due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights.*

educational/institutional use and new associated facilities subject to the Specific Plan. Approval of a Specific Plan Exception would allow the continuation of an existing legal non-conforming private school (institutional) use. The project would also be consistent with the environmental protection measures for Outer Corridor development, which address prominent ridges, streams, projects located near parklands, oak trees, and archaeological and paleontological resources. As part of the project, a Specific Plan Exception pursuant to LAMC §11.5.7F would also be required to allow one building to exceed the 40-foot height limit specified for the Outer Corridor. As discussed above, the Middle and Upper School Main Academic Center would require a 55-foot maximum building height due to proposed changes in finished grade that would be necessary to accommodate the project's excavated soils on-site in order to nearly eliminate the need for soil export or import. However, the building would appear no greater than 43.6 feet in height from most vantage points. All other proposed building heights would fall below the 40-foot height limit specified by the Specific Plan. With the approval of Specific Plan Exception pursuant to LAMC §11.5.7F, the project would be consistent with applicable height regulations of the Specific Plan.

Project development would also be guided by the Specific Plan Design and Preservation Guidelines. The Guidelines are not intended to be mandatory requirements for projects; rather, it is expected that, at a minimum, individual projects address the applicable Guidelines. The project would be generally consistent with applicable guidelines, as detailed in Section IV.H, Land Use of the Draft EIR. Overall, the project would also comply with the intent of the Design and Preservation Guidelines, which seek to protect views along the Mulholland Scenic Parkway Corridor in accordance with the Specific Plan.

(2) Consistency with Regional Plans and Applicable Policies

The project would support the concepts and policies contained within the Southern California Association of Governments' Regional Comprehensive Plan and Guide, as expansion of the existing school facilities would concentrate development within a previously developed site located near existing public facilities, infrastructure, and roadways. Additionally, since the Southern California Air Quality Management District's Air Quality Management Plan (AQMP) incorporates projections from local planning documents and the proposed project would be consistent with the existing land use designations of the relevant Community Plan, the project would not conflict with the AQMP for the South Coast Air Basin. Furthermore, implementation of the project would not conflict with the Metropolitan Transport Authority Congestion Management Plan (CMP), as it would not exceed CMP thresholds at any CMP intersection or freeway monitoring location.

(3) Land Use Compatibility

The existing Buckley School campus has been developed for use as a private school since the late 1960s. Educational uses have therefore been part of the land use relationships within the local residential area for over a generation. Public school properties are, for the most part, located throughout the City of Los Angeles in residential neighborhoods, and are zoned "Public Facility" due to public ownership. Private schools, on the other hand, are typically permitted as a conditional use subject to issuance of a CUP in which conditions are specified to ensure compatibility with nearby residential uses. Thus, schools are a necessary and appropriate use in residential areas. Project consistency with the site's existing and proposed land use and zoning designations, discussed above, further supports the suitability of proposed development at the project site.

The project represents a continuation of an existing private school use and would not introduce new uses that would conflict with or have an adverse impact on surrounding land uses. The proposed campus enhancements would support a well-established City policy that the improvement of existing school facilities, when properly conditioned through the discretionary review process, is preferred over the construction of entirely new school facilities within established residential areas. Furthermore, the project would allow the School to revise operating conditions that are confusing or stimulate difficulties with the neighbors to incorporate current City standards for private schools within the City.

Development of the project within the existing campus would not physically disrupt or divide existing land uses in the area, encroach upon residential uses, or alter the overall character of the campus or the surrounding neighborhood. While the project would allow for an increase in floor area, a modest increase in the number of students, and new outdoor athletic facilities (e.g., the proposed Aquatic Center and new basketball court), none of the operational characteristics of the project would result in a significant environmental impact. Construction of the project would result in significant impacts associated with noise and localized air emissions. However, these impacts would be short-term in nature and would be phased to avoid disruption of classes during the regular school year and to minimize impacts on neighbors of the campus at all times. Based on the above, the project would not substantially or adversely change the existing relationship between on- and off-site land uses and properties, or have the long-term effect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation.

b. Cumulative Impacts

The 29 related projects in the project vicinity generally consist of infill development and redevelopment of existing uses. As with the proposed project, related projects would be required to comply with relevant land use policies and regulations. Therefore, as the project would

generally be consistent with applicable land use plans, the project would not incrementally contribute to cumulative inconsistencies with respect to land use plans. Cumulative impacts on the regulatory framework would be less than significant.

Additionally, there are no related projects located within the immediate vicinity of the site. Therefore, the project in combination with related projects would not alter the existing land use relationships in the community. As such, the project would not contribute to a cumulative impact with respect to land use compatibility.

c. Mitigation Measures

The project's design features, which are described in Section IV.H, Land Use, of the Draft EIR, as well as Section II, Corrections and Additions, of this Final EIR, would become conditions of approval and would ensure that land use impacts associated with the proposed project would be less than significant. Thus, no mitigation measures would be required.

d. Level of Significance After Mitigation

Impacts related to land use would be less than significant, and therefore, no mitigation measures would be required.

9. NOISE

a. Environmental Impacts

(1) Construction

The existing residential uses that surround the project site represent the noise-sensitive uses that would be most affected during project construction. Residential uses that are closest to the project site are located along Stansbury Avenue, Camino de la Cumbre and Camino de Solana. There are also sensitive receptors along other streets in the project vicinity including Beverly Ridge Drive and Coy Drive. As described in detail in Section IV.I, Noise, of the Draft EIR, since noise level increases would exceed the 5 A-weighted decibel (dBA) significance threshold at sensitive receptor locations during on-site construction activities, construction-period noise impacts would be significant without implementation of mitigation measures.

In addition to on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the site throughout the construction duration. Based on the proposed truck routes and vehicle trips associated with construction workers, four roadway segments in the vicinity of the project site were analyzed for potential impacts associated with

construction-related vehicular traffic. The largest construction traffic noise impact with respect to hourly L_{eq} (i.e., time variation in noise exposure expressed in terms of the average energy over time) is anticipated to occur along the segment of Stansbury Avenue, between the school gate and Valley Vista Boulevard, where construction-related traffic volumes would cause overall roadway noise to increase by 13.0 dBA L_{eq} (1-hour). With respect to increase in Community Noise Equivalent Level (CNEL), the largest noise increase would occur along the same segment of Stansbury Avenue where CNEL would increase by approximately 11.2 dBA. Noise levels would exceed the 5-dB significance criterion along each of the four analyzed roadway segments; therefore, construction-period roadway noise impacts are considered significant. It is important to note that this impact would result from a very high construction traffic volume scenario that could potentially occur during the peak day of the most intense stage of construction activity (i.e., the approximately four-month period of concrete truck traffic related to Phase 2 construction activities) where construction traffic comprises the highest percentage of total traffic volumes.

(2) Long-Term Operations Noise

Based on the project traffic study included as Appendix L to the Draft EIR, the project is expected to generate an additional 278 daily trips due to increased enrollment and additional staff prior to traffic mitigation measures.[17] Thus, traffic attributed to project improvements represents a nominal increase in traffic over the total daily traffic traveling along the local roadways. The largest project-related and cumulative traffic-related noise impact is anticipated to occur along the segment of Stansbury Avenue, south of Valley Vista Boulevard. Project-related traffic would add 0.5 dBA CNEL to this roadway segment, while related project plus ambient growth traffic volumes are expected to add an additional 0.2 dBA CNEL to this roadway segment. The largest cumulative traffic-related noise impact is anticipated to occur along two segments: Valley Vista Boulevard, east of Stansbury Avenue and Stansbury Avenue, north of Valley Vista Boulevard. The cumulative traffic-related noise impact to these roadway segments would be 1.1 dBA CNEL, which falls well below the 5 dBA CNEL significance threshold. Thus, roadway traffic noise related to project development would be less than significant and no mitigation measures would be required. Furthermore, with implementation of the TDM plan, with the ultimate goal to reduce project trips so there would be no increase in daily trips above that currently generated by the School, traffic noise would be further reduced.

An analysis was performed to determine the maximum allowable noise levels to be generated by rooftop equipment or the central plant without exceeding significance thresholds. Implementation of the proposed project design features would ensure that rooftop equipment noise levels do not exceed 50 dBA during daytime operations, or 40 dBA during nighttime

[17] *Refer to Section II, Corrections and Additions, of this Final EIR, for updated information regarding project trip generation and associated impacts.*

operations at any property line. Thus, when added to the presumed daytime and nighttime ambient noise levels of 50 dBA and 40 dBA, respectively, mechanical equipment generated noise levels would result in a maximum marginal noise level increase of 3 dBA to both the daytime and nighttime noise environments. This noise level increase would be below the 5 dBA significance threshold. As such, noise impacts related to mechanical equipment operations would be less than significant and no mitigation measures would be required.

The proposed project would include an enclosed parking facility located beneath the new Middle and Upper School Main Academic Center in the center of the project site. The parking facility would be enclosed and, therefore, off-site noise levels from existing parking activities may actually decrease due to noise attenuation from the structure. In addition, the vehicular entrance to the parking facility would be from the north with pedestrian access provided to the school to the west. As shown in the conceptual site plan, these openings would be internal to the site with existing and proposed buildings located further to the west. Thus, parking facility-related noise levels would not exceed the 5 dBA significance threshold at any residence located immediately north or west of the proposed parking facility. As a result, potential noise impacts that may result due to the parking facility would be less than significant and no mitigation measures would be required.

Project implementation would involve reconfiguring the outdoor athletic activity areas. Specifically, a new Aquatic Center would be built near the current outdoor basketball and weight facility located at the northeast corner of the athletic field. To provide for a conservative (high) estimate of potential noise impacts to nearby residences, the analysis assumed that all outdoor athletic activity areas would generate noise simultaneously. As described in Section IV.I, Noise, of the Draft EIR, the athletic field activities would increase noise levels in the vicinity of residential property locations by a maximum of 4.4 dBA L_{eq}, which is less than the City's 5 dB significance criterion.

b. Cumulative Impacts

Noise from construction of the proposed project and related projects would be localized, thereby potentially affecting areas immediately surrounding or between each particular project site. In addition to the 29 identified related projects, renovation and improvement of residential properties in the neighborhoods surrounding the school site is a regular occurrence and may last from less than a month to more than one year with highly variable noise implications. The nearest listed related project to the proposed project is a 16,500 square foot shopping center proposed at 14121 Ventura Boulevard, which is located about 0.5 mile north of the project site. Thus, due to distance attenuation alone, construction noise from one site would not result in a noticeable increase in noise at sensitive receptors near the other project site. Furthermore, each of the related projects would be required to comply with the noise regulations set forth by the Los Angeles Municipal Code and subject to noise-limiting mitigation measures similar to those

prescribed for the proposed project. As such, cumulative impacts associated with construction noise would be less than significant.

The cumulative increase in future CNEL traffic noise levels at project buildout with future ambient growth relative to the existing baseline would be 1.1 dB or less in areas that can potentially be affected by the proposed project. This increase would not be perceptible and would be less than significant.

The project site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from lawn maintenance activities, mechanical equipment (e.g., air conditioning systems), and vehicle movements, among other community noise sources. As demonstrated above, noise impacts related to continued operation of the project site would be less than significant. In addition, the closest related project is located approximately within 0.5 miles to the north of the project site. As such, cumulative noise impacts related to long-term project operations would be less than significant.

c. Mitigation Measures

Mitigation Measure I-1: Engine idling from construction equipment such as bulldozers and haul trucks shall be limited, to the extent feasible.

Mitigation Measure I-2: All construction equipment shall be fitted with residential grade mufflers, where readily available in the construction equipment fleet that regularly serves the City of Los Angeles. Prospective contractors shall demonstrate a good faith effort to locate such construction equipment for use throughout the duration of project construction.

Mitigation Measure I-3: An 8-foot temporary sound barrier (e.g., wood fence) shall be erected along portions of the north and northwest property lines to limit the "line of sight" of construction activity from the adjacent residential properties that are located immediately north and northwest of proposed construction areas.

d. Level of Significance After Mitigation

Construction-period noise impacts after implementation of mitigation measures would be the highest at multiple residence locations situated along Camino de la Cumbre and Stansbury Avenue. At some residence locations along these two streets, the hourly L_{eq} could potentially increase by as much as 10 dBA over baseline ambient noise conditions. Other sensitive receptors, including those along Camino de Solana and Beverly Ridge Drive, would also experience noise levels that exceed City significance thresholds, where the daytime hourly L_{eq}

noise level after implementation of mitigation measures could potentially increase by as much as 5 dBA. Noise impacts during construction would continue to exceed the 5 dBA significance criterion at multiple receptor locations during all project construction phases even with implementation of feasible mitigation measures. As such, construction-period noise impacts would be temporary, significant and unavoidable.

In addition, roadway noise attributable to construction traffic volumes will exceed the 5 dBA significance threshold along the following roadway segments during various portions of the construction period: Valley Vista Boulevard, west of Stansbury Avenue; Valley Vista Boulevard, east of Stansbury Avenue; Stansbury Avenue, between School Gate and Valley Vista Boulevard; and Stansbury Avenue, north of Valley Vista Boulevard. As there is no feasible mitigation to reduce these impacts, roadway noise impacts during construction would be temporary, significant and unavoidable.

As discussed above, no significant impacts associated with athletic field noise, long-term roadway noise, or mechanical equipment/stationary-source noise were identified. As such, noise impacts related to these elements of long-term project operations would be less than significant.

10. TRANSPORTATION AND CIRCULATION

a. Environmental Impacts

(1) Construction

Construction of the project would generate a range of approximately 84 to 416 daily truck/haul trips (in passenger car equivalents or PCE), with an average of 176 daily trips, conservatively. The same amount of construction trips was assumed for both weekday and Saturday conditions. As discussed in detail in the Traffic Study presented in Appendix L, significant construction traffic impacts would occur only at the street segment of Stansbury Avenue south of Valley Vista Boulevard.

With regard to parking, all construction-related vehicles would be parked or stored in designated areas on-site to the extent possible. When sufficient space is not available to park all users on-site, the School would implement a parking plan that provides temporary off-site parking for construction workers and, if necessary, faculty/staff and/or students. A shuttle service would be operated between the off-site parking location and the project site at two possible locations approximately one mile from the project site. Under this parking plan, an adequate parking supply would be available to accommodate all construction- and School-related vehicles without the use of any on-street parking nearby. Therefore, no parking impacts due to construction-related activities are anticipated on the surrounding streets.

(2) Operation

The project would be expected to generate approximately 278 net new daily vehicle trips.[18] During the A.M. peak-hour, a net increase of 75 trips (42 inbound and 33 outbound) would occur. During the school P.M. and commuter P.M. peak-hours, a net increase of 47 trips (22 inbound and 25 outbound) and 25 trips (9 inbound and 16 outbound) would occur, respectively. The project would significantly impact three intersections: (1) Ventura Boulevard and Stansbury Avenue during the A.M. and school P.M. peak hours; (2) Valley Vista Boulevard (South) and Beverly Glen Boulevard during the A.M. and school P.M. peak hours; and (3) Valley Vista Boulevard and Stansbury Avenue during the A.M. peak hour. Proposed mitigation measures would reduce these significant intersection impacts to less than significant levels.

With regard to impacts on residential street segments, the project would add approximately 242 net daily trips to Stansbury Avenue south of Valley Vista Boulevard since this directly accesses the School's main entrance.[19] Impacts would be less than significant on all eight residential street segments, including Stansbury Avenue south of Valley Vista Boulevard. Nonetheless, implementation of the proposed Transportation Demand Management (TDM) Plan would reduce daily project traffic on the surrounding residential street segments.

The project's proposed new configuration of circulation space would require all vehicles entering the Stansbury Avenue gate to proceed to the new arrival plaza, visitor parking area, or enter the enclosed parking facility. The new parking facility will provide a queuing capacity for approximately 40 vehicles on the lower level and approximately 29 vehicles on the upper level, for a total of at least 69 vehicles. The new arrival plaza would also serve to maximize the vehicle queuing capacity of the campus. Under the proposed project, the existing vehicle queuing on Stansbury Avenue would be eliminated. Thus, the project would improve on-site access and circulation, and impacts would be less than significant.

With regard to CMP intersection impacts, the intersections of Ventura Boulevard/ Woodman Avenue, located one mile northeast of the project site, and Ventura Boulevard/ Sepulveda Boulevard, located two miles northwest of the project site, are designated CMP monitoring intersections within the project vicinity. Based on the traffic study provided in Appendix L of the Draft EIR, the proposed project would not add 50 or more trips to the two CMP intersections, and impacts would be less than significant.

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[18] *Refer to Section II, Corrections and Additions, of this Final EIR, for updated information regarding project trip generation and associated impacts.*

[19] *Ibid.*

The CMP also requires that any freeway segment where a project is expected to add 150 or more trips in any direction during the A.M. or P.M. peak hours be analyzed. The maximum number of trips to be generated for a peak hour would be 42 inbound trips during the A.M. peak hour. Therefore, as the peak-hour trips expected to use the freeway network for project site access are substantially less than the freeway threshold of 150 directional trips, impacts to the freeways would be less than significant. No further analysis of CMP freeway analysis is necessary.

As described in detail in Appendix L of the Draft EIR, the project's parking supply of 306 spaces, along with the supplemental off-site parking and shuttle service for special events (e.g., Buckley School Annual Fair, Commencement Proceedings) would be sufficient to meet parking demand. Thus, impacts on parking would be less than significant.

b. Cumulative Impacts

The traffic models utilized in the traffic analysis incorporated forecasted traffic increases due to ambient growth and related projects through the future study year (2014).[20] Furthermore, the CMP analysis presented above evaluates traffic impacts on a larger, regional scale. Therefore, cumulative impacts on intersections, residential neighborhoods, and regional transportation system as a result of the proposed project have been analyzed. Impacts pertaining to site access/queuing are localized impacts. As there are no other related projects within the immediate project vicinity, the project would not contribute to cumulative impacts for these issue areas. With regard to parking and emergency access, it is anticipated that future related projects would be subject to City review to ensure that adequate parking and access would be maintained in the project vicinity. Therefore, cumulative impacts related to these issues would be less than significant.

c. Mitigation Measures

Mitigation Measure J-1: Temporary "Truck Crossing" warning signs shall be placed in each direction in advance of the intersection of Stansbury Avenue and Valley Vista Boulevard.

Mitigation Measure J-2: A flag person or persons shall be positioned near the project site to assist truck operators in entering and exiting the project area, and to help minimize conflicts with pedestrians and other motorists.

[20] *Also refer to Section II, Corrections and Additions, of this Final EIR for a discussion of impacts associated with a buildout year of 2012, which would occur if the alternative construction schedule is implemented.*

Mitigation Measure J-3: To the greatest extent possible, the arrival and departure of construction trucks shall be minimized during peak student arrival and departure periods, and peak commuter periods.

Mitigation Measure J-4:

Transportation Demand Management (TDM) Plan – Implement an enhanced TDM Plan for the School that increases the use of carpooling, public transportation, bicycling, and privately operated bus and shuttle services. The goal of the TDM Plan shall be to reduce project-related trips so that School-related vehicular traffic throughout the day remains at existing levels.

At a minimum, the TDM Plan shall reduce project-related trips during the A.M. peak hour by at least 75 trips, resulting in no increase to the existing A.M. peak-hour trip generation level, and a reduction of at least 4 project trips during the School P.M. peak hour. Additionally, although not required as mitigation, the School has volunteered to reduce project-related daily trip generation of 278 vehicle trips by at least 40 percent (i.e., a minimum of 111 trips). Aside from the required reduction of 75 trips during the A.M. peak hour and 4 trips during the School P.M. peak hour, the remaining reduction of 32 trips (i.e., 111 – 75 – 4 = 32) may be achieved during any time of the School day.

Additionally, although not required as mitigation, to further reduce impacts the Applicant also volunteers to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan. This reduction shall be applied to the existing trip generation levels of 702 trips during the A.M. peak and 443 trips during the School P.M. peak, as detailed in Appendix L (Sub-Appendix C) of the Draft EIR, thus yielding A.M. and P.M. peak generation levels of 667 trips and 421 trips, respectively.[21] This reduction shall be phased over the course of three years, beginning in the school year following project approval.

A draft of the proposed TDM Plan is provided in Appendix 3 of this Final EIR. The final TDM Plan shall be developed in consultation with LADOT. After initial implementation, this Plan may be refined as appropriate to achieve the required and desired trip reductions. This plan shall be resubmitted annually at the beginning of the School year for approval by LADOT, until such time that this procedure is no longer required by LADOT.

[21] *These five percent peak-hour reductions total 57 trips [(702 - 667) + (443 - 421) = 57]. In combination with the required A.M. peak-hour reduction of 75 project trips and the required School P.M. peak-hour reduction of 4 project trips, this reduction would exceed the voluntary 40 percent reduction in project-related daily trip generation, while also reducing School-related vehicle trips during peak hours to less than existing levels.*

Mitigation Measure J-5: Ventura Boulevard and Stansbury Avenue – Widen Stansbury Avenue by 10 feet along the east side of Stansbury Avenue between Ventura Boulevard and the alley south of Ventura Boulevard.[22] Restripe Stansbury Avenue to provide one exclusive left-turn lane and one exclusive right-turn-only lane in the northbound direction.

Mitigation Measure J-6: Valley Vista Boulevard and Stansbury Avenue – Stripe southbound Stansbury Avenue and eastbound Valley Vista Boulevard to each provide one left-turn/through shared lane and one right-turn-only lane in the southbound and eastbound directions.[23] The removal of approximately three on-street parking spaces would be required along the west side of Stansbury Avenue north of the intersection, in addition to approximately one to two on-street parking spaces along the south side of Valley Vista Boulevard west of the intersection.

Mitigation Measure J-7: Stansbury Avenue – All student drop-off and loading shall take place entirely on-site, without any on-street student drop-off. The School shall prepare a student drop-off and pick-up plan to be reviewed by the LADOT district office. The plan shall include provisions for staggered drop-off and pick-up hours so as to reduce queuing on-site. The plan shall also include provisions for penalties for parents who do not follow the drop-off and pick-up rules. The plan shall also include a site plan of the school with the drop-off and pick-up areas clearly designated.

Mitigation Measure J-8: Traffic Monitoring Compliance Report – Per the LADOT approved TDM Plan, the applicant shall be required to hire a licensed traffic engineer as a consultant to conduct traffic trip counts at the School and submit a Compliance Report to LADOT during the fall of each year. The applicant shall be required to submit the fall Compliance Report before the end of November of each year. Such reports shall conform to requirements provided by LADOT. If the average of the trip counts indicate that the School exceeds

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[22] *These transportation improvements shall be guaranteed through the B-permit process of the Bureau of Engineering, Department of Public works. Any improvements shall be constructed and completed before the issuance of the final certificate of occupancy, to the satisfaction of DOT and the Bureau of Engineering. Prior to setting the bond amount, the Bureau of Engineering shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator to arrange a pre-design meeting to finalize the design for the required transportation improvements. Additional street improvements may be required. The applicant should contact the Bureau of Engineering, Department of Public Works to determine any other requirements. Any street dedication shall be completed through the Department of Public Works, Bureau of Engineering, Land Development Group, before the issuance of any building permit for this project.*

[23] *This mitigation measure, which was required by LADOT in its traffic assessment letter (included as Appendix L-1), reflects a slight variation from the mitigation measure for this intersection recommended in the traffic study, but mitigates significant impacts at the intersection to a less than significant level to generally the same degree.*

its trip ceilings of 2,770 daily trips, 667 A.M. peak hour trips or 421 School P.M. peak-hour trips, which represent both mandatory and voluntary trip reductions, the School shall conduct new counts and submit a spring Compliance Report before the end of April of each year. In the event that the applicant is not in compliance with the trip ceilings in the spring Compliance Report, the applicant shall be required to pay a $1,000 (one thousand dollars) penalty to the City of Los Angeles for each A.M. and School P.M. trip that the School generates in excess of its trip ceilings or reduce the student enrollment for the following school year an amount equal to the number of A.M. and School P.M. trips exceeded during the previous year. If the project trip generation proves to be in compliance with the established trip ceilings for five consecutive years the applicant shall no longer be required to submit the Compliance Reports to LADOT.

Mitigation Measure J-9: Site Access and Circulation - All loading and unloading of students must be accomplished on-site. The reservoir space for dropping off or picking up students must be large enough so that vehicles do not encroach onto the City right-of-way. It needs to be substantially in conformance with the design submitted to DOT on August 4, 2006 as part of the On-Site Queuing Capacity Analysis.

Mitigation Measure J-10: Site Access and Circulation - Final DOT approval shall be obtained regarding the project's driveways, internal circulation and parking schemes prior to issuance of any building permits. This should be accomplished by submitting detailed site and driveway plans, with a minimum scale of 1"-40', to DOT's Valley Development Review Section.

d. Level of Significance After Mitigation

With implementation of the Mitigation Measures J-4 through J-10 above, the significant operational traffic impacts at the three intersections would be reduced to less than significant levels.

Temporary construction-related traffic impacts would remain significant even after the implementation of mitigation measures. There are no feasible mitigation measures which could reduce construction-traffic impacts to levels that are less than significant. The only reasonable alternative mitigation would be to extend the construction time frame so that there would be less construction personnel and vehicles on-site at any give time. However, such a measure would be inefficient as well as costly and would prolong disruption to School operations and the surrounding neighborhood. Nevertheless, the mitigation measures above would help to minimize construction impacts to the extent possible.

As discussed in Section II, Corrections and Additions to the Draft EIR, the project may provide an alternate construction schedule wherein Phase 2 of construction would precede Phase 1. However, impacts related to the alternative construction schedule would not be substantially different from those associated with the proposed project summarized above.

II. Corrections and additions to the Draft EIR

II. CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

This section of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct, or add to the environmental impact analysis for the Buckley School Campus Enhancement Plan. Such changes are a result of public and agency comments received in response to the Draft EIR and/or new information that has become available since publication of the Draft EIR. The first several subsections below describe an alternative construction phasing schedule contemplated for the project, followed by a summary of associated impacts that may result, where different from those already analyzed and disclosed in the Draft EIR. Beginning with Subsection G, standard corrections and additions to the text of the Draft EIR are provided.

A. POTENTIAL ALTERNATIVE CONSTRUCTION SCHEDULE

A description of the schedule and activities planned for construction of the Buckley School Campus Enhancement Plan is provided in Section II, Project Description, of the Draft EIR (Volume I). As discussed therein, construction of the project would be completed in three primary phases over the course of approximately five years, spread out over an approximate six and a half year timeframe beginning in 2009.[23] However, since publication of the Draft EIR, the School has evaluated a possible alternative construction phasing schedule in response to community input, in keeping with the extensive community outreach efforts that have been a part of the project planning and design process dating back to 1997. As such, the School is proposing a flexible construction schedule with phasing alternatives, to allow the School to most efficiently address its project objectives and respond to community concerns, in light of available resources at the commencement of construction. The purpose of this discussion is to analyze the impacts of the potential alternative construction schedule and incorporate the ensuing analysis into the environmental record, such that either construction phasing scenario may be implemented by the School upon approval of the project. As demonstrated below, this analysis concludes that the environmental impacts of an alternative construction schedule would not be substantially different from those associated with the construction schedule contemplated in the Draft EIR, and that neither construction schedule would be considered environmentally superior to the other. Moreover, each of the construction schedules would satisfy the project objectives to the same degree, although the alternative phasing scenario discussed below would accomplish many of the established objectives more quickly. The following describes potential construction schedule changes that may be implemented for the project.

[23] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR, for a correction to the duration of construction originally presented in the Draft EIR.*

Under this alternative construction schedule, construction of the project would still be completed in three primary phases over the course of approximately five years, spread out over an approximate six and a half year timeframe. However, under this scenario, Phase 2 of construction, as described in Section II, Project Description, of the Draft EIR, would precede Phase 1. Thus, anticipated construction schedules would be as follows: Phase 2 – two months of preparatory work beginning in March 2009, then approximately 18 months of construction beginning in May 2009; Phase 1 – two months of preparatory work beginning in March 2012, then approximately 12 months beginning in May 2012; Phase 3 – two months of preparatory work beginning in March 2013, then intermittent outdoor construction and/or interior renovations occurring over an approximate two and a half year period beginning in May 2013. As planned, each construction phase would begin with an approximate two month period of minor preparatory work, with more intensive construction activities beginning in approximately May of each phase, coinciding with the end of the school year, as was evaluated in the Draft EIR.

Under this new scenario, a period of approximately one and a half years with no active construction would occur subsequent to completion of Phase 2 (which would occur first under this alternative construction schedule) and prior to commencement of Phase 1 (which would occur second under this alternative construction schedule). Completion of Phase 1 would coincide with the two month preparatory period for Phase 3; this slight overlapping of Phases 1 and 3 is similar to the potential overlapping of Phases 1 and 2 that was evaluated where appropriate in the Draft EIR (e.g., the construction traffic and air quality analyses) in order to provide a conservative analysis. As described in the Draft EIR, Phase 3 would consist of four sub-phase components, grouped together as a single phase for operational and construction logistics.

Prior to commencement of Phase 2, access improvements would be necessary to widen the existing access drive from the School's back gate along Camino de la Cumbre to the existing Main Academic Campus buildings and the athletic field in order to meet Fire Code requirements.[24] Under the construction phasing analyzed in the Draft EIR, this activity was included as part of Phase 1. Under the possible alternative phasing, this activity would be planned separate from, and in advance of, project construction in order to more immediately enhance emergency access on-site. This work would occur during the summer of 2008 over the course of approximately 6 to 8 weeks and would require minor grading of approximately

[24] *In addition to providing emergency access throughout the campus, this internal roadway would be used for normal School access and required fire truck access to Gilley Field, as well as to accommodate construction vehicles during the project, specifically for construction access to Gilley Field, where temporary classroom bungalows would be installed prior to the start of Phase 2.*

40 cubic yards and construction of retaining walls.[25] Upon completion, the access road would be maintained as a 20-foot clear Fire Department emergency access route.

As described in Section II, Project Description of the Draft EIR, modular units would be required for displaced classrooms during Phase 2 and are planned to be located on the existing athletic field as well as in a small area immediately north of the Academic Building South. Under the alternative construction schedule, additional modular units would be located on the site of the existing Milk House, as shown in Figure II-1 on page II-4. Collectively, the modular units would cover an area of approximately 5,700 square feet within the Main Academic Campus and approximately 34,000 square feet on Gilley Field. As previously described, the majority of the classroom facilities would be used for Middle and Upper School classes for approximately 18 months during construction of Phase 2 (primarily during the 2009–2010 school year). Following their temporary use, the bungalows would be removed and the playing field and other campus areas restored.

The project has been designed to balance cut and fill quantities on-site in order to limit the export and import of soil and avoid associated impacts, such that only nominal export or import may be needed. The proposed alternative construction schedule would not affect grading quantities evaluated in the Draft EIR; overall, grading would require an estimated 20,341 cubic yards of cut and an estimated 19,503 cubic yards of fill, with nominal (i.e., less than 1,000 cubic yards) soil import and/or export.[26]

B. PROJECT IMPLICATIONS

As demonstrated in the brief analyses that follow, the proposed alternative construction schedule, whereby Phase 2 would precede Phase 1, would have little effect on the project's construction-related impacts, except insofar as the impacts associated with each individual phase would occur during a slightly different timeframe. Overall, no new significant impacts would occur, nor would there be a substantial increase in the severity of any previously identified impacts. However, a few aspects of the project itself would be altered as a result of the potential schedule change.

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[25] *All of the graded materials would be utilized on-site as fill, with an additional five cubic yards of soil import required. These earthwork quantities were previously included in the Phase 1 earthwork totals, as evaluated in the Draft EIR.*

[26] *The grading quantities have been revised based on the development of more detailed construction plans that were not available at the time the Draft EIR was published. This change would not otherwise affect the daily schedule or overall duration of construction, as described in the Draft EIR. Refer to Section II, Corrections and Additions (Subsection G), of this Final EIR for further discussion.*

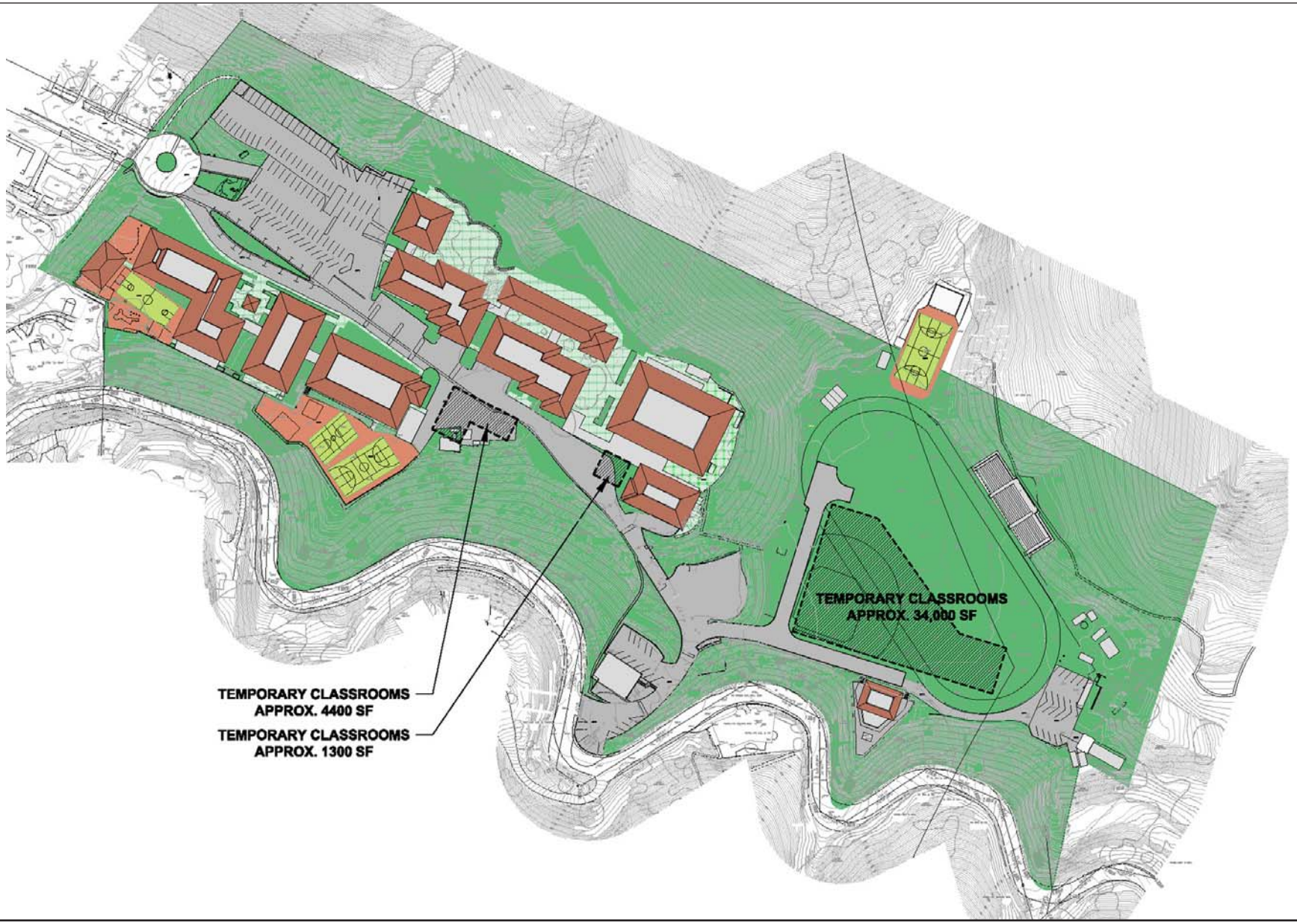

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Figure II-1
Proposed Modular Classroom Areas

Source: Jeffrey M. Kalban & Associates Architecture, Inc., April 2007

As discussed in the Draft EIR, the School requested a modest increase in enrollment as part of the project beginning in the 2007–2008 school year, with an initial enrollment increase of 20 students.[27] Subsequently, a phased enrollment increase of 20 students per year would follow completion of Phase 2. Thus, under the alternative construction schedule the phased enrollment increase would begin in the 2010–2011 school year and continue for three years, until the maximum enrollment cap of 830 students is reached in the 2012–2013 school year. While construction activities may continue until 2015, the potential operational impacts associated with the project are linked to the proposed student enrollment increase. As such, the discussion below addresses any operational impacts associated with a project buildout year of 2012 that may vary from those operational impacts disclosed in the Draft EIR.[28]

C. RELATIONSHIP TO PROJECT OBJECTIVES

By proposing a flexible construction schedule, the School may more immediately attain some of the educational, site design, and community objectives established for the project, which were detailed in Section II, Project Description of the Draft EIR. Specifically, the following project objectives could be achieved more quickly under the alternative construction phasing schedule, as discussed further below:

- Create separate dedicated facilities for the athletic, visual arts, and performing arts programs that reflect the needs of the twenty-first century Buckley student and eliminate existing scheduling conflicts among some of the visual arts classes and between athletic programs and performing arts classes;

- Create science facilities as well as additional classrooms that reflect the needs of the twenty-first century Buckley student;

- Provide appropriate instructional space for school programs in order to eliminate inadequacies in the existing educational facilities located on campus (e.g., the choir, which currently practices in the Disney Pavilion lobby; the athletic and performing arts courses that are forced to share classroom space and conduct classes simultaneously; classrooms that lack space for computers and other modern

[27] *The school is now requesting an enrollment increase of 10 students in the beginning of the 2008-2009 school year, followed by an increase of 10 students in the 2009-2010 school year.*

[28] *The Draft EIR evaluated a buildout year of 2014, the year in which full student enrollment of 830 students would be achieved following completion of Phase 2 of construction, were Phase 2 to follow Phase 1. Under the proposed alternative construction schedule, Phase 2 would precede Phase 1 and would thus be completed earlier. Consequently, the student enrollment increase would occur by 2012, as analyzed herein.*

interactive instructional materials; and classes currently conducted in the Transportation Building);

- Accommodate a modest increase in total student enrollment to support Buckley's educational philosophy, enhance curriculum flexibility, and promote high academic standards encompassing a broad curriculum;

- Provide facilities that meet modern fire protection, disabled access, and energy efficiency standards;

- Create on-campus parking spaces that sufficiently accommodate the vehicles operated by students, parents, and visitors that travel to the campus on a regular daily basis;

- Contain vehicle queuing and student drop-off/pick-up within the campus, keeping this activity off of Stansbury Avenue;

- Unify the campus and eliminate operational and safety challenges by eliminating regular access (except for emergency vehicles) along an internal roadway that currently bisects the campus;

- Provide an open air waiting area for students at the same grade as the pick-up/drop-off area within the Parking Facility so as to maximize student safety and the efficiency of the pick-up/drop-off process;

- Reduce hardscape and roadways in favor of a landscaped campus featuring native plant species appropriate for the canyon setting; and

- Upgrade mechanical facilities and improve energy efficiency throughout the campus by centralizing mechanical infrastructure within a Central Plant.

As discussed in the Draft EIR, the proposed Parking Facility (to be constructed during Phase 2) would increase both the on-site parking supply as well as the capacity for vehicle queuing on campus. With the earlier timing of Phase 2 under the alternative construction schedule, the School's parking needs would be met and vehicular queuing would be accommodated on-site earlier. Thus, the existing queuing of vehicles on Stansbury Avenue would be eliminated earlier than under the construction schedule analyzed in the Draft EIR, thereby benefiting the surrounding community. Traffic congestion on Stansbury Avenue has been voiced as a major concern by many of the School's neighbors, as evidenced in the public comment letters received on the Draft EIR (addressed in Section III, Response to Comments of this Final EIR).

Similarly, the School would benefit from early construction of Phase 2 in that needed classroom space provided by the Middle and Upper School Main Academic Center would be

available sooner. As such, the School could more promptly meet its programmatic need to provide appropriate instructional space for many school programs, eliminate inadequacies in the existing educational facilities located on campus, and eliminate class scheduling conflicts. A total of 43 state-of-the-art classrooms, including specialized spaces for visual art, science, and performing arts instruction, as well as performing arts practice rooms, would be provided within the Main Academic Center.

Also as part of Phase 2, the proposed landscaped central pedestrian walkway/fire road and the Central Plant would be developed. By constructing Phase 2 earlier, implementation of the landscaped central pedestrian walkway would serve to more promptly promote a green campus complementary to the canyon and buffer the surrounding residences from campus development as well as subsequent project construction to the extent feasible. The proposed on-site fire road access improvements would also be achieved earlier, thus benefiting the students through improved safety and emergency access. Development of the Central Plant over an earlier timeframe would similarly benefit the School in that mechanical facilities would be upgraded and energy efficiency would be improved throughout the site sooner.

D. PROJECT IMPACTS ASSOCIATED WITH THE ALTERNATIVE CONSTRUCTION SCHEDULE

The following is a discussion of environmental impacts (both construction-related and operational) that may result from implementation of the potential alternative construction phasing schedule, where different from those impacts analyzed and disclosed in the Draft EIR. As demonstrated in the analyses that follow, neither construction nor operational impacts would be substantially different from or greater than those associated with the construction schedule contemplated in the Draft EIR. Furthermore, neither construction schedule would be considered environmentally superior to the other.

1. Aesthetics, Views, and Light and Glare

Implementation of the potential alternative construction schedule has been analyzed to determine whether there would be any new or different aesthetic impacts as compared to those associated with the construction schedule analyzed in the Draft EIR. As discussed in Section IV.A, Aesthetics, of the Draft EIR, the most noticeable visual change during construction would be the temporary bungalows utilized on-site as modular classrooms. Given the change in timing of construction activities expected with the alternative schedule (i.e., implementation of Phase 2 prior to Phase 1), the timeframe during which the temporary classroom bungalows would be used would vary. In addition, as described above, modular units would be introduced on the site of the existing Milk House, as well as on a portion of the existing athletic field and in a small area immediately north of the Academic Building South (refer to Figure II-1 for an illustration).

The majority of the classroom facilities would be used for Middle and Upper School classes for approximately 18 months during construction of Phase 2 (primarily during the 2009–2010 school year).

While the design and layout of these facilities would strive to simulate a campus environment for students, the bungalows would not embody the same caliber of building materials as the proposed permanent structures on the site, nor would the bungalows be fully integrated visually with existing campus development and the surrounding canyon. Following their temporary use, the bungalows would be removed and the playing field and other campus areas restored. As discussed in the Draft EIR, it has been assumed that the temporary classroom bungalow areas, while temporary, would pose substantial visual discord with the surrounding environment and would result in a significant aesthetic impact during construction. In any event, existing views from the residential areas to the west would remain screened in part by the existing topography and vegetation, and clear, unobstructed views of construction activities would not be available from most off-site vantage points except at a distance. With implementation of all project features and mitigation measures described in the Draft EIR (refer to Section IV, Mitigation Monitoring and Reporting Program, of this Final EIR for an updated list of mitigation measures), construction-related aesthetic impacts would remain short-term, significant and unavoidable, as determined in the Draft EIR.

2. Air Quality

An air quality analysis was conducted for the alternative construction schedule. This analysis uses the same methodology, significance thresholds, project assumptions (except that construction of Phase 2 would proceed first), and project-generated traffic volumes as utilized in the air quality analysis provided in Section IV.B, Air Quality, of the Draft EIR. The results of the analysis are summarized below; refer also to Appendix 1 of this Final EIR for associated calculation worksheets.

a. Construction Impacts

As discussed in Section IV.B, Air Quality, of the Draft EIR, the maximum regional emissions associated with project construction would occur during Phase 2 due to construction of the new Middle and Upper School Main Academic Center building and enclosed Parking Facility. With implementation of the alternative construction schedule contemplated herein, the maximum emissions would occur earlier in the overall construction schedule. In addition, the maximum pollutant emissions would increase slightly because pollutant emissions are directly dependent on the construction analysis year. Future construction years account for a more modern and cleaner burning construction equipment fleet mix. A comparison of daily regional emissions associated with Phase 2 construction is presented in Table II-1 on page II-9 for both the proposed construction schedule (as described in the Draft EIR) and the alternative

Table II-1

Unmitigated Project-Related Construction Emissions During Phase 2
Comparison of Original Construction Schedule and Potential Alternative Phasing
(pounds per day)

	CO	NOx	PM_{10}	$PM_{2.5}$ [a]	VOC	SOx
Regional [b]						
Regional Daily Significance Threshold	550	100	150	55	75	150
Construction Phasing Analyzed in Draft EIR	270.8	251.2	39.0	12.0	42.0	<1
Exceed Threshold?	No	**Yes**	No	No	No	No
Alternative Construction Phasing	273.1	267.4	39.4	12.1	42.2	<1
Exceed Threshold?	No	**Yes**	No	No	No	No
Difference (lbs/day)	2.3	16.2	0.4	0.1	0.2	<1
Difference (%)	0.8%	6.4%	1.0%	0.8%	0.5%	0.1%
Change in Significance Conclusion?	No	**No**	No	No	No	No
Localized						
LST Threshold [c]	994	262	13	13	-	-
Construction Phasing Analyzed in Draft EIR	223.8	160.2	37.1	10.2	35.3	<1
Exceed Threshold?	No	No	**Yes**	No	No	No
Alternative Construction Phasing	225.6	163.8	37.2	10.3	35.5	<1
Exceed Threshold?	No	No	**Yes**	No	No	No
Difference (lbs/day)	1.8	3.6	0.1	0.1	0.2	<0.1
Difference (%)	0.8%	2.2%	0.3%	1.0%	0.5%	<0.1
Change in Significance Conclusion?	No	No	**No**	No	No	No

[a] *$PM_{2.5}$ emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*
[b] *Maximum regional emissions for all pollutants occur during Phase 2.*
[c] *The project site is located in SCAQMD Source Receptor Area (SRA) No. 7. These LSTs are based on the site location SRA and project area that could be under construction on any given day. In regard to the LST look-up tables, the analysis assumed a five-acre site with a 25 meter receptor distance.*

Source: PCR Services Corporation, 2007.

construction schedule. Similar to the proposed project construction schedule, Phase 2 regional construction emissions associated with the alternative construction schedule would not exceed the SCAQMD daily significance thresholds for PM_{10}, $PM_{2.5}$, CO, VOC or SO_X. However, maximum regional emissions would exceed the SCAQMD daily significance thresholds for NO_X. In comparison to the proposed project construction schedule, pollutant emissions would increase by approximately six percent for NO_x and up to or less than one percent for CO, PM_{10}, $PM_{2.5}$, VOC and SO_x. Regardless, similar to the proposed project construction schedule, regional construction emissions resulting from the alternative construction schedule would result in a significant short-term impact.

A comparison of localized impacts from Phase 2 construction is also presented in Table II-1 for both the proposed and alternative construction schedules. As shown therein,

maximum localized construction emissions would not exceed the localized screening thresholds for CO, NO_X or $PM_{2.5}$. However, the maximum localized emissions would exceed the localized screening thresholds for PM_{10} during site preparation activities for Phase 2 under both construction scenarios. Similar to the proposed project construction schedule, Phase 2 construction activity under the potential alternative construction schedule would result in a significant localized PM_{10} impact to sensitive receptors in close proximity to the project site.

A mitigated construction analysis was also conducted and is presented in Table II-2 on page II-11. The results of the analysis are similar to the unmitigated condition, and impacts associated with the alternative construction schedule would remain significant and unavoidable for regional NO_X emissions and localized PM_{10} impacts subsequent to mitigation. These impacts and significance conclusions are similar to those presented in the Draft EIR.

b. Operational Impacts

Although construction activities would continue through 2015, the potential operational impacts associated with the project are linked to the proposed student enrollment increase, with the full enrollment of 830 students anticipated to occur during the 2012–2013 school year under the alternative construction schedule (as opposed to the 2014–2015 school year, which would occur under the construction schedule presented in the Draft EIR). In order to properly analyze operational emissions, it is important to assign appropriate emissions and emission factors to the individual emissions sources. Mobile source emission forecasts are sensitive to the forecast year, as future mobile source emission factors are substantially reduced as cleaner on-road vehicles are introduced into the county-wide vehicle fleet.

The URBEMIS2002 model takes these factors into consideration and it is recommended by SCAQMD for such analyses. The allowable model years are 2007 through 2010, 2015, 2020, and 2030. To be conservative the analysis presented in the Draft EIR was based on a buildout year of 2010, as using 2015 would have slightly under predicted the regional pollutant emissions. Thus, the shift to an operational year of 2012 due to implementation of the alternative construction schedule would not change the results of the analysis. The conclusions presented in Section IV.B, Air Quality, of the Draft EIR regarding regional operational emissions would remain unchanged. As indicated therein, regional emissions resulting from operation of the project are expected to be well below the SCAQMD thresholds for all criteria pollutants. During the operational phase of the project, traffic would have the potential to produce local area impacts. An analysis of a selected intersection was performed in the Draft EIR to determine the potential for the creation of CO impacts (hotspots). Local area CO concentrations were projected using the CALINE-4 traffic pollutant dispersion model. The results of the local area CO dispersion analysis were presented in Table IV.B-7 on page 164 of the Draft EIR. With the change in buildout years (i.e., from 2014 to 2012), the maximum 1-hour predicted CO concentration would increase from 7.6 to 8.3 ppm and the 8-hour concentration would increase

Table II-2

Mitigated Project-Related Construction Emissions During Phase 2
Comparison of Original Construction Schedule and Potential Alternative Phasing
(pounds per day)

	CO	NOx	PM_{10} [a]	$PM_{2.5}$ [a]	VOC	SOx
Regional [b]						
Regional Daily Significance Threshold	550	100	150	55	75	150
Construction Phasing Analyzed in Draft EIR	259.6	243.2	27.9	9.0	40.7	<1
Exceed Threshold?	No	**Yes**	No	No	No	No
Alternative Construction Phasing	262	259.2	28.3	9.1	40.7	<1
Exceed Threshold?	No	**Yes**	No	No	No	No
Difference (lbs/day)	2.4	16.0	0.4	0.1	<0.1	<0.1
Difference (%)	0.9%	6.6%	1.4%	1.1%	<0.1%	<0.1%
Change in Significance Conclusion?	No	**No**	No	No	No	No
Localized						
LST Threshold [c]	994	262	13	13	-	-
Phase 2 (Beginning in 2010 per Draft EIR)	212.6	152.2	25.9	7.1	33.8	<1
Exceed Threshold?	No	No	**Yes**	No	No	No
Phase 2 (Beginning in 2009)	215.8	155.6	26.1	7.2	33.8	<1
Exceed Threshold?	No	No	**Yes**	No	No	No
Difference (lbs/day)	3.2	3.4	0.2	0.1	<0.1	<0.1
Difference (%)	1.5%	2.2%	0.8%	1.4%	<0.1	<0.1
Change in Significance Conclusion?	No	No	**No**	No	No	No

[a] *$PM_{2.5}$ emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*
[b] *Maximum regional emissions for all pollutants occur during Phase 2.*
[c] *The project site is located in SCAQMD Source Receptor Area (SRA) No. 7. These LSTs are based on the site location SRA and project area that could be under construction on any given day. In regard to the LST look-up tables, the analysis assumed a five-acre site with a 25 meter receptor distance.*

Source: PCR Services Corporation, 2007.

from 6.9 to 7.4 ppm. This CO concentration would occur at the intersection of Stansbury Avenue and Valley Vista Boulevard. The increase in CO concentrations is a function of a higher background concentration in an earlier modeled year and not a function of project traffic. In fact, the incremental concentration change as a result of the project remains less than 0.1 ppm. The maximum CO concentration would be well below the most stringent 1-hour and 8-hour CO AAQS of 20 ppm and 9.0 ppm. The complete local CO modeling results are provided in Appendix 1 of this Final EIR.

3. Land Use

Construction activities can be a source of land use compatibility issues. As discussed herein, construction of the project based on the alternative construction schedule would result in

temporary significant impacts associated with aesthetics, air quality, noise, and traffic. However, these impacts would be short-term in nature and would be phased to minimize impacts on neighbors of the campus at all times. As determined in Section IV.H, Land Use, of the Draft EIR, the project would not substantially or adversely change the existing relationship between on- and off-site land uses and properties, or have the long-term affect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation. Furthermore, the project's design features (listed throughout the Draft EIR and supplemented herein) would become conditions of approval and would ensure that land use impacts associated with the proposed project would be less than significant.[29]

4. Noise

a. Construction Impacts

Relative to the noise analysis, implementation of the potential alternative construction schedule would merely change the order of construction activities; the actual construction activities, the location of such activities, and the equipment mix for each construction phase would not be altered as a result of the possible schedule change. Thus, the construction noise levels for Phases 1, 2, and 3, as analyzed in Section IV.I, Noise of the Draft EIR, would not be affected; merely the timing of the impacts associated with each phase would be affected (i.e., due to implementation of Phase 2 prior to Phase 1). As discussed in the Draft EIR, noise impacts would be temporary but significant, and impacts after mitigation would similarly be significant and unavoidable.

b. Operational Impacts

No change in on-site operational activities would occur as a result of the alternative construction schedule. With regard to operational traffic noise levels, the change in buildout to Year 2012 instead of Year 2014 would result in a reduction in predicted future traffic noise levels.[30] As shown in Table II-3 on page II-13, this reduction results in a decrease of approximately 0.2 dBA CNEL for most street segments in the area, as compared to the project as evaluated in the Draft EIR. There would be an increase of 0.1 dBA along Camino de la Cumbre, south of Valley Vista, but overall project and cumulative increments would remain below the 3 dBA threshold. Refer to Appendix 2 of this Final EIR for associated calculation worksheets. Similar to the proposed project as presented in the Draft EIR, no significant impacts would be

[29] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR, for additional project features.*

[30] *As discussed above, although construction activities would continue through 2015, the potential operational impacts associated with the project are linked to the proposed student enrollment increase. The enrollment increase is in turn tied to construction of Phase 2, which would occur earlier under the alternative phasing schedule (i.e., since Phase 2 would precede Phase 1).*

Table II-3

Calculated Future Traffic Noise Levels at Project Buildout
(in dBA for Project Noise Levels in the Draft EIR / Alternative Construction Schedule Noise Levels)

		Calculated Future CNEL (dBA) at Roadway Right-of-Way				
Roadway Segment	**Existing CNEL**	**Future No Project**	**Future with Project**	**Project Increment [a]**	**Cumulative Increment [b]**	**Significant?**
Stansbury Avenue, north of Valley Vista Boulevard	56.7 / 56.7	57.6 / 57.4	57.8 / 57.6	0.2 / 0.2	1.1 / 0.9	No
Stansbury Avenue, south of Valley Vista Boulevard	55.1 / 55.1	55.3 / 55.3	55.8 / 55.8	0.5 / 0.5	0.7 / 0.7	No
Valley Vista Boulevard, east of Stansbury Avenue	57.5 / 57.5	58.6 / 58.4	58.6 / 58.5	0.0 / 0.1	1.1 / 1.0	No
Valley Vista Boulevard, west of Stansbury Avenue	58.0 / 58.0	58.9 / 58.8	59 / 58.8	0.1 / 0.0	1.0 / 0.8	No
Greenleaf Street, west of Stansbury Avenue	53.7 / 53.7	54.4 / 54.2	54.4 / 54.2	0.0 / 0.0	0.7 / 0.5	No
Dickens Street, west of Stansbury Avenue	56.8 / 56.8	57.5 / 57.3	57.5 / 57.3	0.0 / 0.0	0.7 / 0.5	No
Camino de la Cumbre, west of Stansbury Avenue	52.1 / 52.1	52.8 / 52.6	52.8 / 52.6	0.0 / 0.0	0.7 / 0.5	No
Camino de la Cumbre, south of Valley Vista Boulevard	51.2 / 51.2	51.9 / 51.7	52 / 51.9	0.1 / 0.2	0.8 / 0.7	No

[a] *Increase relative to traffic noise levels associated with ambient growth without the project compared with ambient growth plus project development.*

[b] *Cumulative increase relative to existing traffic noise levels, resulting from ambient growth and related projects, plus project development prior to the implementation of the TDM plan.*

Source: PCR Services Corporation, 2007.

associated with athletic field noise, long-term roadway noise, or mechanical equipment/ stationary-sources in conjunction with the alternative construction schedule.

5. Transportation and Circulation

a. Construction Impacts

An analysis of the alternative construction schedule traffic was conducted for the same 17 street segments that were evaluated in Section IV.J, Transportation and Circulation, of the Draft EIR. This analysis uses the same methodology, significance thresholds, project assumptions (except that construction of Phase 2 would proceed first), and existing and cumulative traffic volumes as the construction traffic analysis presented in the Draft EIR. The results of this analysis are summarized in Table II-4 on page II-14.

Table II-4

Construction-Related Traffic Impacts

Construction Phasing Analyzed in Draft EIR [a]		Alternative Construction Phasing [b]	
Construction of the project would generate a range of approximately 84 to 416 daily trips, with an average of 176 trips per day (all in Passenger Car Equivalents).		Construction of the project would generate a range of approximately 84 to 416 daily trips, with an average of 176 trips per day (all in Passenger Car Equivalents).	
16 of the 17 street segments would not experience significant construction traffic impacts.		16 of the 17 street segments would not experience significant construction traffic impacts.	
Significant construction traffic impacts are expected to occur on one street segment only, which is Stansbury Avenue south of Valley Vista Boulevard, for the months estimated below.		Significant construction traffic impacts are expected to occur on one street segment only, which is Stansbury Avenue south of Valley Vista Boulevard, for the months estimated below.	
Weekday & Saturday:	8 months: June–July & September 2010, Ph. 2; May–September 2014, Ph. 3B, 3C & 3D.	Weekday & Saturday:	8 months: June-July & September 2009, Ph. 2; May-September 2014, Ph. 3B, 3C & 3D.
Saturday Only: [c]	34 months: May–July 2009 & March–April 2010, Ph. 1; May 2010, August 2010, October 2010–October 2011, Ph. 2; May–July 2013 & April 2014, Ph. 3A; October 2014–June 2015, Ph. 3B & 3C; September 2015, Ph. 3C.	Saturday Only:	34 months: May 2009, August 2009 & October 2009–October 2010, Ph. 2; May–July 2012 & March–April 2013, Ph. 1; May– uly 2013 & April 2014, Ph. 3A; October 2014–June 2015, Ph. 3B & 3C; September 2015, Ph. 3C.

[a] *Refer to the Traffic Study provided as Appendix L to the Draft EIR for further discussion and calculations.*

[b] *Refer to Appendix 3 of this Final EIR for additional information regarding construction traffic generation and impacts.*

[c] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for a correction to the duration of Saturday Only construction impacts originally presented in the Draft EIR.*

Source: Crain & Associates, 2007.

As this analysis indicates, the construction traffic generated and the magnitude and duration of its impacts under the alternative construction schedule would be essentially the same as identified and evaluated in the construction traffic analysis presented in the Draft EIR.[31] No new significant traffic impacts would occur.

The same construction traffic mitigation measures proposed for the construction schedule evaluated in the Draft EIR (listed in Section IV, Mitigation Monitoring and Reporting Program,

[31] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for a correction to the duration of Saturday Only construction impacts originally presented in the Draft EIR.*

of this Final EIR) would be recommended for the alternative construction schedule, if implemented. Impacts after mitigation would also be essentially the same as for the scenario evaluated in the Draft EIR. As discussed in the Draft EIR, the construction mitigation measures would not quantitatively reduce construction traffic impacts to a less than significant level; they would, however, ease traffic impacts by reducing conflicts and congestion and improving traffic safety.

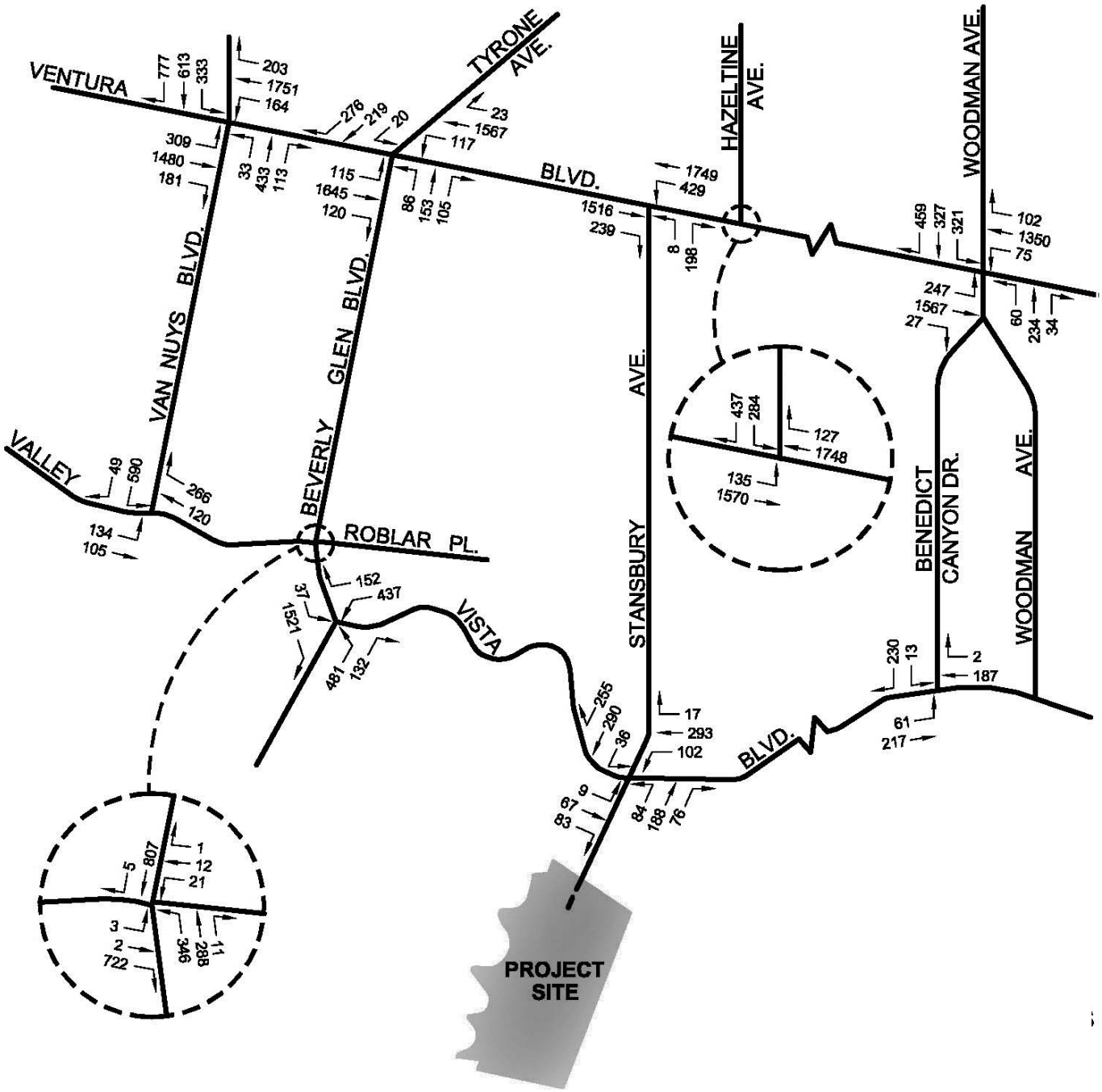
b. Operational Impacts

Intersections

Since the alternative construction schedule would allow the School to achieve its 80-student enrollment increase by the 2012–2013 school year, an analysis of the future traffic conditions at the study intersections for future year 2012 was performed. This analysis uses the same criteria as the traffic impact analysis presented in Section IV.J, Transportation and Circulation of the Draft EIR, including the same methodology, significance thresholds, project assumptions (except that buildout would occur in 2012 when the student enrollment increase is complete, instead of 2014), existing and cumulative traffic volumes, and existing and future roadway system geometric and signal operation characteristics.

To develop the future (2012) baseline traffic conditions, a growth factor of 2 percent compounded annually was applied to the existing (2006) traffic volumes. Trips attributable to 29 related projects, as identified in Section III, Environmental Setting, of the Draft EIR, were then added to form the basis for the future (2012) "Without Project" traffic conditions in the study area. Figure II-2 through Figure II-4 on pages II-16 through II-18 show the future (2012) "Without Project" traffic volumes. Net project volumes, shown in Table IV.J-8 of the Draft EIR, were then combined with the future (2012) "Without Project" traffic volumes to develop the future (2012) "With Project" volumes Figures II-5 through II-7 on pages II-19 through II-21 shows the future (2012) "With Project" traffic volumes.

As shown in Table II-5 on page II-22, although the addition of project traffic will increase the Critical Movement Analysis (CMA) value at all of the study intersections during peak hours, the incremental project traffic additions will not result in a change in level of service at any of the study intersections. Prior to the addition of project traffic, it is estimated that two of the study intersections would continue to have good levels of service (LOS A through LOS C) during the peak hours. For the future (2012) "With Project" condition, these two intersections will continue to operate at LOS A through LOS C during the peak hours. The intersection of Ventura Boulevard and Hazeltine Avenue is expected to operate at LOS D during the A.M. and Commuter P.M. peak hours, and LOS C during the School P.M. peak hour, both with or without the project. The remaining seven study intersections are expected to operate at LOS E or F during at least one of the peak hours, with or without the project.



PCR

Not to scale

Figure II-2
Future (2012) Without Project Traffic Volumes A.M. Peak Hour

Source: Crain & Associates, March 2007.

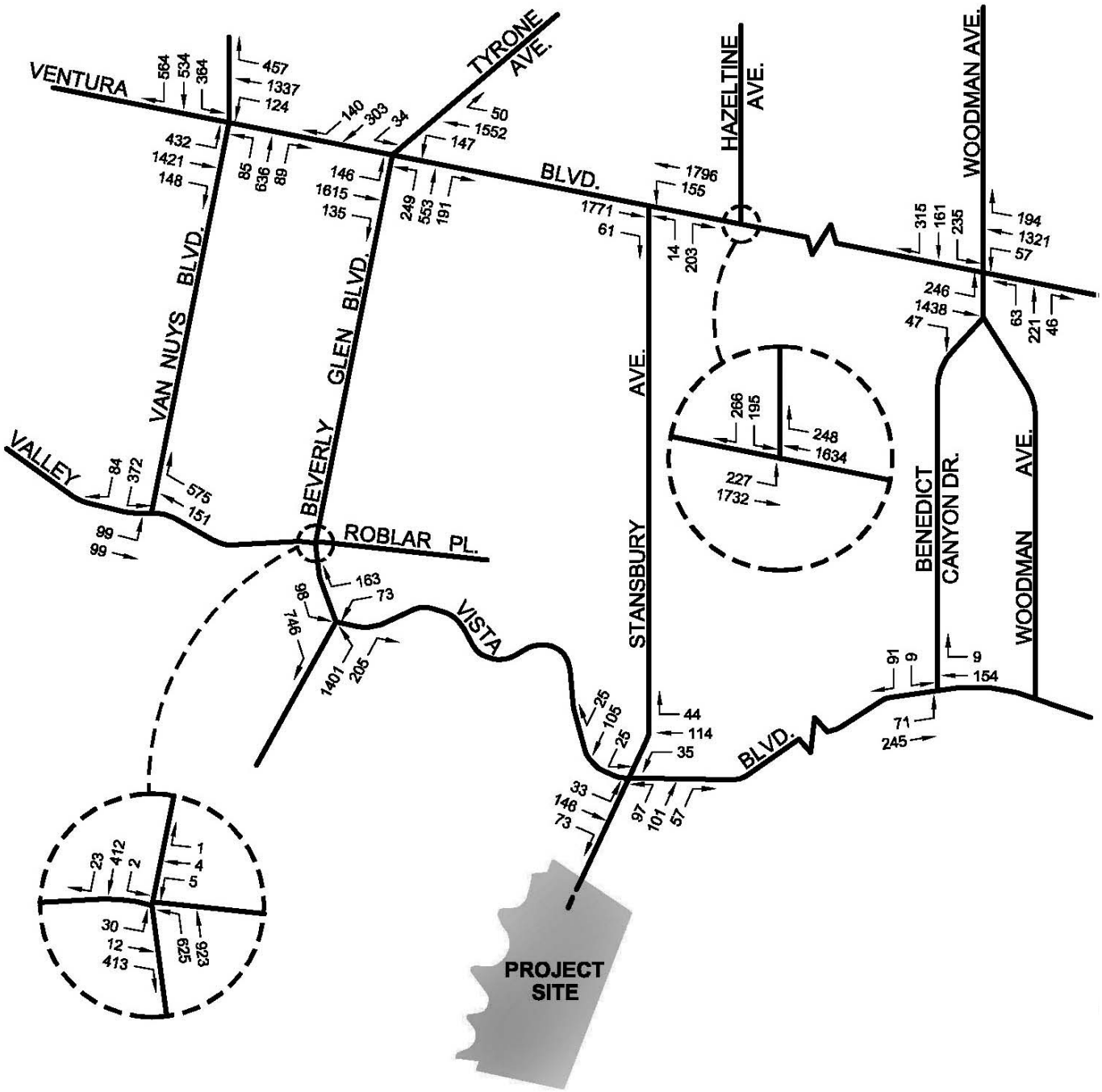


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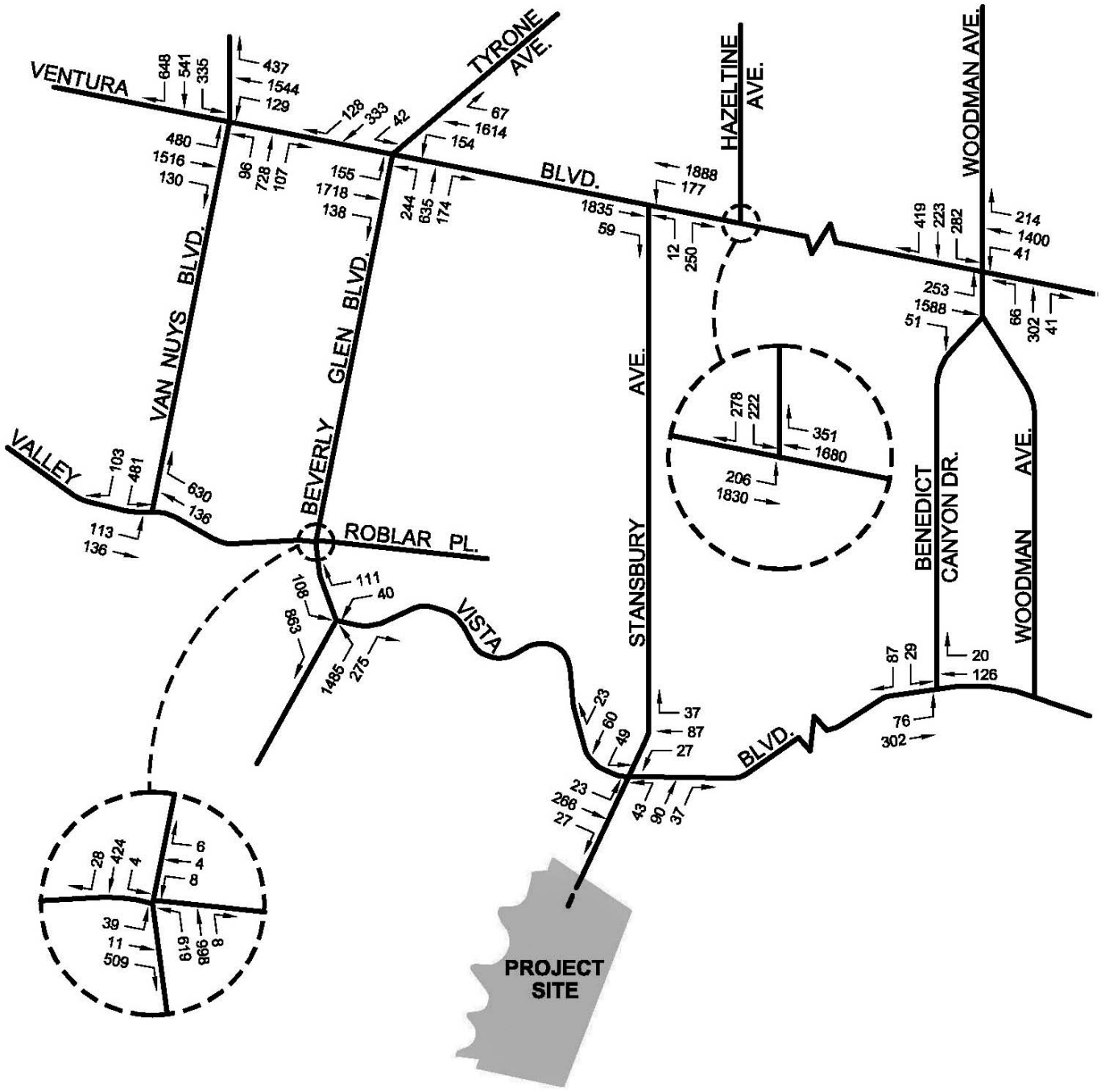
Figure II-3
Future (2012) Without Project
Traffic Volumes School P.M. Peak Hour

Source: Crain & Associates, March 2007.



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Not to scale

Source: Crain & Associates, March 2007.

Figure II-4
Future (2012) Without Project
Traffic Volumes Commuter P.M. Peak Hour

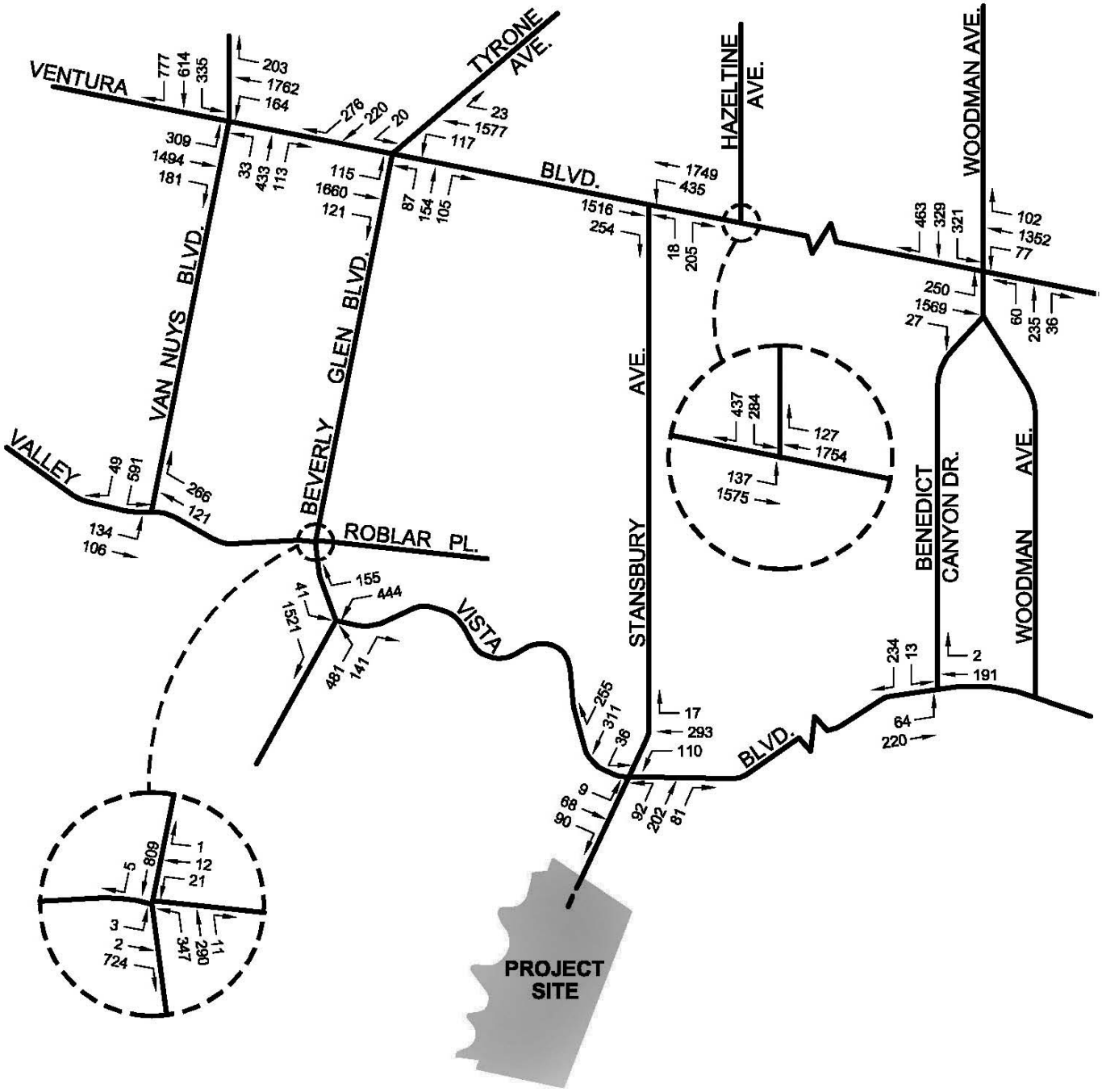

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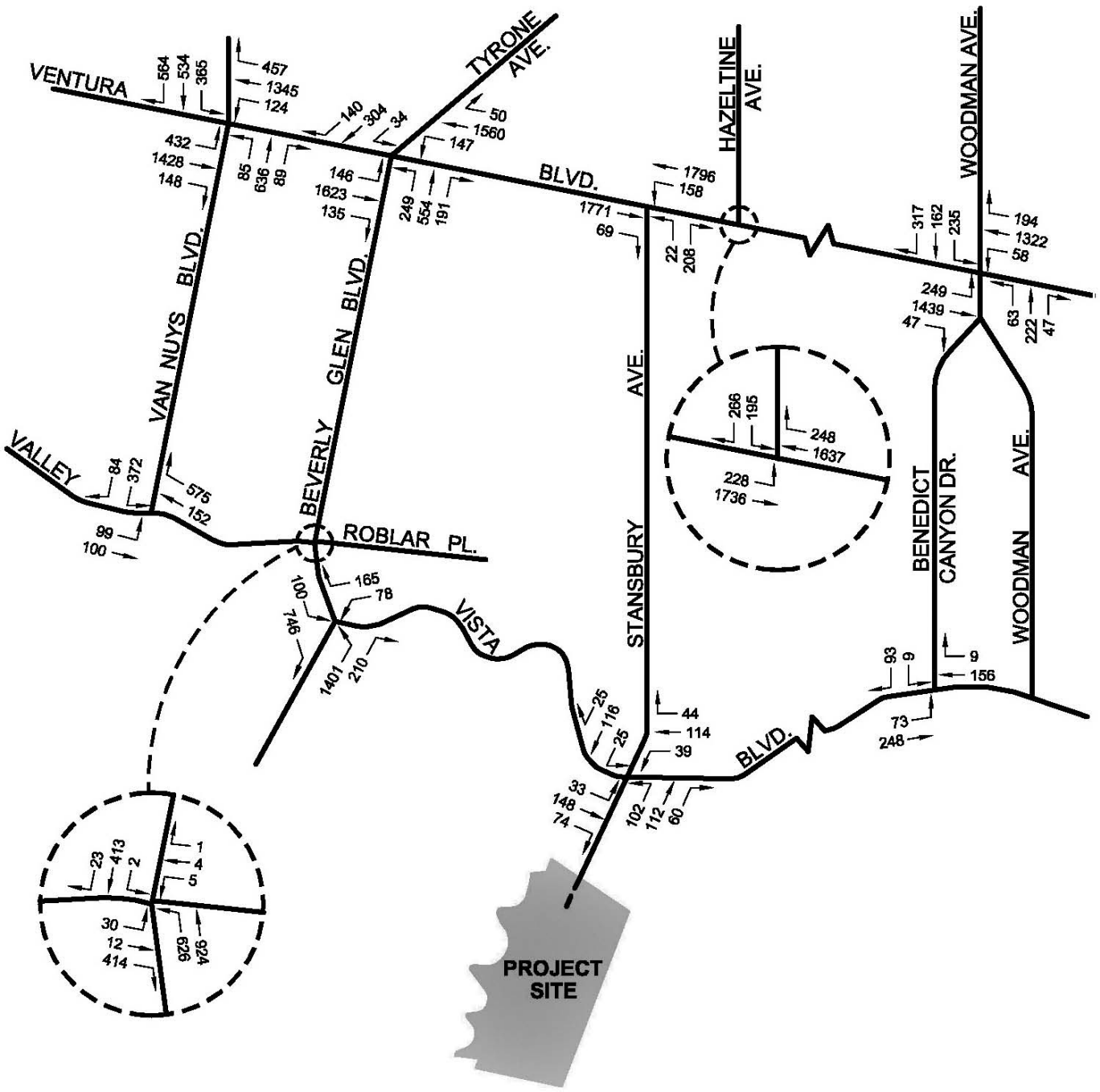
Figure II-5
Future (2012) With Project Traffic Volumes A.M. Peak Hour

Source: Crain & Associates, March 2007.



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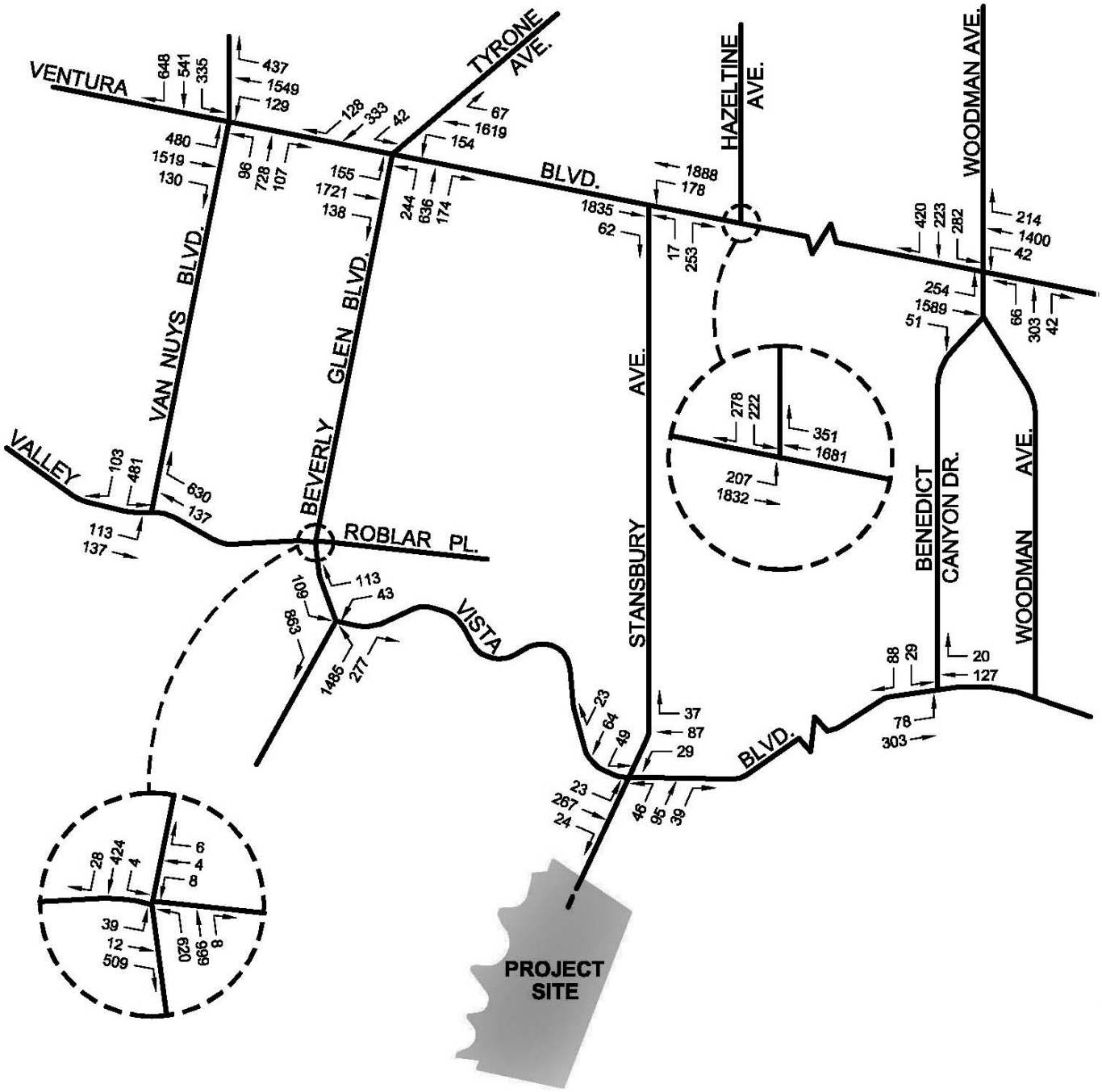
Not to scale

Figure II-6
Future (2012) With Project
Traffic Volumes School P.M. Peak Hour

Source: Crain & Associates, March 2007.



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Not to scale

Figure II-7
Future (2012) With Project
Traffic Volumes Commuter P.M. Peak Hour

Source: Crain & Associates, March 2007.

Table II-5

Critical Movement Analysis Summary
Existing (2006) and Future (2012) Conditions

			Existing (2006)		Future (2012)							
					Without Project		With Project				With Project + Mitigation	
No.	Intersection	Peak Hour	CMA	LOS	CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
1.	Ventura Blvd. & Van Nuys Blvd.	AM	1.004	F	1.204	F	1.208	F	0.004			
		School PM	0.968	E	1.253	F	1.257	F	0.004			
		Commuter PM	1.064	F	1.360	F	1.362	F	0.002			
2.	Ventura Blvd. & Beverly Glen Blvd./ Tyrone Ave.	AM	0.634	B	0.769	C	0.776	C	0.007			
		School PM	0.765	C	0.949	E	0.953	E	0.004			
		Commuter PM	0.815	D	1.006	F	1.007	F	0.001			
3.	Ventura Blvd. & Stansbury Ave.	AM	1.072	F	1.261	F	1.286	F	0.025 *	1.107	F	-0.154
		School PM	0.868	D	1.073	F	1.090	F	0.017 *	1.003	F	-0.070
		Commuter PM	0.940	E	1.155	F	1.163	F	0.008	1.074	F	-0.081
4.	Ventura Blvd. & Hazeltine Ave.	AM	0.717	C	0.861	D	0.864	D	0.003			
		School PM	0.611	B	0.780	C	0.781	C	0.001			
		Commuter PM	0.656	B	0.831	D	0.831	D	0.000			
5.	Ventura Blvd. & Woodman Ave.	AM	0.785	C	0.941	E	0.946	E	0.005			
		School PM	0.735	C	0.904	E	0.907	E	0.003			
		Commuter PM	0.839	D	1.023	F	1.025	F	0.002			
6.	Valley Vista Blvd. & Van Nuys Blvd.	AM	0.611	B	0.703	C	0.705	C	0.002			
		School PM	0.438	A	0.518	A	0.519	A	0.001			
		Commuter PM	0.517	A	0.608	B	0.609	B	0.001			

Table II-5 (Continued)

Critical Movement Analysis Summary
Existing (2006) and Future (2012) Conditions

			Existing (2006)		Future (2012)								
					Without Project		With Project				With Project + Mitigation		
No.	**Intersection**	**Peak Hour**	**CMA**	**LOS**	**CMA**	**LOS**	**CMA**	**LOS**	**Impact**		**CMA**	**LOS**	**Impact**
7.	Valley Vista Blvd./ Roblar Pl. & Beverly Glen Blvd.	AM	0.920	E	1.061	F	1.064	F	0.003				
		School PM	0.625	B	0.737	C	0.738	C	0.001				
		Commuter PM	0.641	B	0.755	C	0.757	C	0.002				
8.	Valley Vista Blvd. (South) & Beverly Glen Blvd.	AM	0.877	D	1.002	F	1.018	F	0.016	*	1.011	F	0.009
		School PM	1.339	F	1.535	F	1.545	F	0.010	*	1.541	F	0.006
		Commuter PM	1.390	F	1.592	F	1.598	F	0.006		1.596	F	0.004
9.	Valley Vista Blvd. & Stansbury Ave.	AM	0.954	E	1.086	F	1.123	F	0.037	*	0.852	D	-0.234
		School PM	0.482	A	0.567	A	0.593	A	0.026		0.517	A	-0.050
		Commuter PM	0.479	A	0.562	A	0.572	A	0.010		0.541	A	-0.021
10.	Valley Vista Blvd. & Benedict Canyon Dr.	AM	0.301	A	0.347	A	0.354	A	0.007				
		School PM	0.234	A	0.277	A	0.282	A	0.005				
		Commuter PM	0.281	A	0.329	A	0.332	A	0.003				

** Denotes significant project traffic impact, prior to implementation of project mitigation.*

Source: Crain & Associates, 2007.

The project would significantly impact three study intersections: (1) Ventura Boulevard and Stansbury Avenue during the A.M. and School P.M. peak hours; (2) Valley Vista Boulevard (South) and Beverly Glen Boulevard during the A.M. and school P.M. peak hours; and (3) Valley Vista Boulevard and Stansbury Avenue during the A.M. peak hour. No new significant traffic impacts or substantial increase in the severity of significant impacts previously identified in the Draft EIR would occur as a result of the revised project buildout year. As described on page 377 of the Draft EIR, the proposed mitigation measures would reduce these significant intersection impacts to levels that are less than significant. (Refer to Section IV, Mitigation Monitoring and Reporting Program of this Final EIR, for a complete list of the proposed mitigation measures.) As such, under the alternative construction scenario, impacts after mitigation would be essentially the same as for the construction scenario evaluated in the Draft EIR.

Residential Street Segments

Similar to the intersection analysis above, existing (2006) traffic volumes for all but one of the street segments were increased by a growth factor of 2 percent per year to develop the future (2012) "Without Project" traffic levels. No growth factor was applied to the street segment of Stansbury Avenue south of Valley Vista Boulevard as this segment is not a through street and therefore, not expected to experience an increase in traffic volume due to through traffic. Net daily project volumes, shown in Table IV.J-8 of the Draft EIR, were then combined with the future (2012) "Without Project" traffic volumes to develop the future (2012) "With Project" volumes.

As shown in Table II-6 on page II-25, impacts would be less than significant on all eight residential street segments.[32] The project would add approximately 242 net daily trips to Stansbury Avenue south of Valley Vista Boulevard, as this street segment directly accesses the School's main entrance. No new significant traffic impacts on residential street segments would occur as a result of the revised project buildout year. The proposed Transportation Demand Management (TDM) Plan, presented as Mitigation Measure J-4 in Section IV, Mitigation Monitoring and Reporting Program of this Final EIR, would reduce daily project traffic on the surrounding residential street segments, including on Stansbury Avenue south of Valley Vista Boulevard. Thus, under the alternative construction scenario, impacts after mitigation would be essentially the same as for the construction scenario evaluated in the Draft EIR.

[32] *Refer to Section II, Corrections and Additions (Subsection G) of this Final EIR, for an updated discussion of project impacts on residential street segments.*

Table II-6

Residential Street Traffic Impact Analysis
Existing (2006) and Future (2012) Average Daily Traffic (ADT) Volumes

Street Segment	Existing (2006) ADT	Future (2012) Without Project	Project Traffic	With Project [a]	% Project Traffic	W/Project + Mitigation	% Project Traffic
1. Stansbury Ave. north of Valley Vista Blvd.	3,427	4,097	130	4,227	3.08%	4,175	1.87%
2. Stansbury Ave. south of Valley Vista Blvd.	2,366	2,506	242	2,748	8.81%	2,651	5.48%
3. Valley Vista Blvd. east of Stansbury Ave.	4,110	5,114	56	5,170	1.08%	5,148	0.65%
4. Valley Vista Blvd. west of Stansbury Ave.	4,609	5,577	64	5,641	1.13%	5,615	0.68%
5. Greenleaf St. west of Stansbury Ave.	1,742	1,962	0	1,962	0	1,962	0%
6. Dickens St. west of Stansbury Ave.	3,527	3,972	0	3,972	0	3,972	0%
7. Camino de la Cumbre west of Stansbury Ave.	1,189	1,339	9	1,348	0.67	1,344	0.40%
8. Camino de la Cumbre south of Valley Vista Blvd.	977	1,100	36	1,136	3.17	1,122	1.93%

[a] *Accounts for limited site access via Camino de la Cumbre for some service vehicles and delivers, some employees, athletic field access, and emergency access.*

Source: Crain & Associates, 2007.

E. LIMITED EXTENSION OF CONSTRUCTION HOURS AND ASSOCIATED PROJECT IMPACTS

As discussed in the Draft EIR, proposed construction work days and hours are generally expected to be Monday through Friday, 7:00 A.M. to 5:00 P.M. and Saturday, 8:00 A.M. to 5:00 P.M. However, in response to community concerns regarding the duration of the construction period and in an effort to ensure that the project is completed as expeditiously as possible, the School has proposed extended construction hours during two four-month periods of Phase 2 of construction, occurring outside of the regular academic year. During Phase 2,

construction days and hours would be Monday through Friday, 7:00 A.M. to 5:00 P.M. each day from September 2nd to April 30th; Monday through Friday, 7:00 A.M. to 7:00 P.M. from May 1st to September 1st; and Saturday, 8:00 A.M. to 5:00 P.M. throughout the year. In addition, between May 1st and September 1st of Phase 2, once a building is fully enclosed, interior construction activities may continue until 9:00 P.M. on weekdays and 6:00 P.M. on Saturday. (Where appropriate, these changes in construction hours are reflected in Subsection G, Corrections and Additions, below.) The extended hours during the summer months of Phase 2 would allow for additional construction time, as needed, to complete specific tasks, allow additional time to address unforeseen issues, and maintain the integrity of the overall construction schedule. This type of flexibility in the construction schedule would also permit construction crews to accomplish as much as possible during the summer months while school is not in session, which could in turn improve construction coordination and reduce traffic congestion when classes resume in the fall and a full student body is present on-site.

It is expected that outdoor construction activities after 5:00 P.M. would only occur during the first summer of Phase 2, and interior construction activities after 5:00 P.M. would only occur during the second summer of Phase 2. Per the City of Los Angeles Noise Regulation, noise-generating construction activities are permitted Monday through Friday from 7:00 A.M. to 9:00 P.M., and on Saturday from 8:00 A.M. 6:00 P.M. Even with the proposed extension in construction hours, which as mentioned above would only occur during two four-month periods out of the entire project construction timeframe, the project would comply with these requirements. More specifically, extended construction hours during the first summer of Phase 2 would be more restrictive than the requirements (i.e., would only extend until 7:00 P.M. during weekdays and 5:00 P.M. on Saturdays); extended construction hours during the second summer would be consistent with the City limitations but would only involve interior construction activities (that would generate little or no noise audible off-site).

While it is not likely that all project construction workers would remain on-site for extended work hours every day during the summer, such a scenario has been assumed in order to present a worst-case analysis of construction impacts occurring after 5:00 P.M. Specifically, the air quality, noise, and traffic impact analyses presented below reflect full construction teams and maximum equipment usage on-site in the evening hours (i.e., after 5:00 P.M.), in compliance with City code, similar to that assumed for the daytime construction analyses presented in the Draft EIR. The following is a discussion of construction-related environmental impacts that may result from implementation of the extended construction hours, where different from those impacts analyzed and disclosed in the Draft EIR. Such impacts have been evaluated for both the original construction phasing schedule contemplated in the Draft EIR, as well as the potential alternative phasing schedule discussed above. As demonstrated in the analyses that follow, impacts associated with the extended construction hours would not be substantially different from or greater than those disclosed in the Draft EIR, nor would they involve new significant impacts or a substantially increased severity of any previously identified significant impacts.

1. Air Quality

An air quality analysis of the extended summer construction hours during Phase 2 was conducted to determine whether the associated construction-related air quality impacts would vary from those disclosed in the Draft EIR in Section IV.B, Air Quality. This analysis used the same methodology, significance thresholds, and project assumptions (except for construction end times during the summer), including the same number of construction employees, deliveries, and haul truck trips required during construction. The results of the analysis are summarized below.

While the maximum hourly usage of construction equipment would not change as a result of extended summer construction hours, the total daily usage of on-site equipment could increase by approximately 20 percent due to the additional work time (i.e., two additional hours added to a ten-hour workday). Consequently, the daily regional construction emissions disclosed in the Draft EIR would increase proportionately. A comparison of daily regional emissions from construction is presented in Table II-7 on page II-28 for both the original construction schedule and for the project with extended summer hours during Phase 2. Similar to the original construction schedule, regional construction emissions associated with extended work hours would not exceed the SCAQMD daily significance thresholds for PM_{10}, $PM_{2.5}$, CO, VOC or SO_X. However, maximum regional emissions would exceed the SCAQMD daily significance thresholds for NO_X, as would similarly occur under the original construction schedule. Additionally, the combined effects of extended summer construction hours and implementation of the alternative construction schedule, discussed above, would also slightly increase construction regional emissions by a maximum of six percent, which would not result in any unidentified air quality impacts that were not previously disclosed in the Draft EIR.

A comparison of localized impacts associated with Phase 2 construction is also presented in Table II-7 for both the original construction schedule and the project with extended summer hours. As shown therein, maximum localized construction emissions would not exceed the localized screening thresholds (LSTs) for CO, NO_X or $PM_{2.5}$. However, the maximum localized emissions would exceed the localized screening thresholds for PM_{10} during site preparation activities for Phase 2 under both construction scenarios. Similar to the original construction schedule, Phase 2 construction activity with extended summer hours would result in a localized PM_{10} impact to sensitive receptors in close proximity to the project site.

A refined analysis was conducted to determine the extent of localized PM_{10} emissions since associated impacts would remain significant after mitigation. Potential localized construction impacts were evaluated in the Draft EIR using the SCAQMD recommended ISCST3 dispersion model. The model uses air monitoring data (e.g., wind speed and direction). Thus, ISCST3 dispersion modeling was conducted to determine whether localized impacts would increase with the extended summer construction hours during Phase 2. As indicated in Section IV.B, Air Quality, of the Draft EIR, the maximum construction-related PM_{10} levels would

Table II-7

Unmitigated Project-Related Construction Emissions During Phase 2
Comparison of Original Construction Schedule and Extended Summer Construction Hours
(pounds per day)

	CO	NOx	PM_{10} [a]	$PM_{2.5}$ [a]	VOC	SOx
Regional [b]						
Regional Daily Significance Threshold	550	100	150	55	75	150
Construction Schedule Analyzed in Draft EIR	270.8	251.2	39.0	12.0	42.0	<1
Exceed Threshold?	No	**Yes**	No	No	No	No
Phase 2 with the Extended Summer Hours	327.7	320.9	40.1	12.1	50.6	<1
Exceed Threshold?	No	**Yes**	No	No	No	No
Difference (lbs/day)	56.9	69.6	1.1	<1	8.6	<1
Difference (%)	21%	28%	3%	1%	20%	21%
Change in Significance Conclusion?	No	**No**	No	No	No	No
Localized						
LST Threshold [c]	994	262	13	13	-	-
Construction Schedule Analyzed in Draft EIR	223.8	160.2	37.1	10.2	---	---
Exceed Threshold?	No	No	**Yes**	No	No	No
Phase 2 with the Extended Summer Hours	266.1	196.5	37.8	10.3	---	---
Exceed Threshold?	No	No	**Yes**	No	No	No
Over/(Under) Threshold	(727.9)	(65.5)	24.8	(2.7)	---	---
Change in Significance Conclusion?	No	No	**No**	No	No	No

Note: Numbers may not sum exactly due to internal rounding.

[a] *Majority of PM_{10} and $PM_{2.5}$ emissions result from soil movement fugitive dust. Although construction equipment duration will be extended, amount of soil movement and hauling would remain the same.*

[b] *Maximum regional emissions for all pollutants occur during Phase 2.*

[c] *The project site is located in SCAQMD Source Receptor Area (SRA) No. 7. These localized screening thresholds (LSTs) are based on the site location SRA and project area that could be under construction on any given day. In regard to the LST look-up tables, the analysis assumed a five-acre site with a 25 meter receptor distance.*

Source: PCR Services Corporation, 2007.

exceed the localized concentration increase threshold of 10.4 µg/m^3 during Phase 2 site preparation activities. The maximum localized PM_{10} concentration during Phase 2 activity would be located along Camino de la Cumbre with a concentration of 35.6 µg/m^3. The extended construction hours would slightly reduce this predicted concentration from 35.6 µg/m^3 to 32.4 µg/m^3 since emissions would be spread out over a greater period of time, allowing for greater dispersion.[33] The combined effects of extended construction hours and implementation of the alternative construction schedule, discussed above, would also slightly reduce the predicted concentration presented in the Draft EIR.

With implementation of mitigation, the results would be similar to the unmitigated condition, and impacts associated with the extended summer construction hours during Phase 2 would remain significant and unavoidable for regional NO_X emissions and localized PM_{10} impacts subsequent to mitigation. These impacts and significance conclusions are similar to those presented in the Draft EIR. In summary, late hour construction during the summer months of Phase 2 would not result in any new significant impacts, nor would it substantially increase the severity of any previously identified significant impacts such that impacts after mitigation would be substantially greater or that the proposed mitigation would be rendered ineffective.

2. Noise

A noise analysis of the extended summer construction hours during Phase 2 was conducted to determine whether the associated construction-related noise impacts would vary from those disclosed in the Draft EIR in Section IV.I, Noise. This analysis used the same methodology, significance thresholds, and project assumptions (except for construction end times during the summer), including the same number of construction employees, deliveries, and haul truck trips required during construction. The results of the analysis are summarized below.

The extended construction hours would not increase the intensity or change the location of project construction activities. The estimated construction noise levels disclosed in Section IV.I, Noise of the Draft EIR, would not change and would remain significant and unavoidable. However, the incremental change in noise levels during construction was based on a comparison of predicted construction noise levels to ambient noise levels. Ambient noise levels were based on actual 24-hour monitoring data in the vicinity of the project site, but only the hours during construction (i.e., 7:00 A.M. to 5:00 P.M.) were included to determine the average ambient noise level. As such, the analysis was reviewed to determine if inclusion of two additional hours (i.e., 5:00 P.M. TO 7:00 P.M.) of ambient measurement data would change the average ambient noise levels. Based on this analysis, it was concluded that the average ambient noise levels would not change with the additional construction hours and, therefore, the construction noise impacts disclosed in the Draft EIR would adequately accommodate noise impacts associated with extended summer construction hours during Phase 2. (Refer to Appendix K-1 of the Draft EIR, for the 24-hour noise measurement data.)

In addition to on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the site throughout the construction duration. The extended construction hours during the summer months of Phase 2 would not affect the number of construction workers on-site or the number of anticipated haul trips and deliveries, and thus

[33] *Additionally, wind shifts tend to occur locally in the evening hours, and as such the extended construction hours would allow for a greater variety of wind directionality, thus further dispersing PM_{10} emissions and reducing the concentration.*

would not increase the number of daily vehicular trips to/from the site. Thus, the construction traffic CNEL noise levels provided in Section IV.I, Noise, of the Draft EIR, would not change and would remain significant and unavoidable. The extended hours would actually spread traffic out over a longer period of time throughout the day. As a result, the peak hour L_{eq} noise levels associated with construction traffic would decrease. Table II-8 on page II-31 shows that peak hour noise levels associated with the extended construction hour schedule would decrease relative to the original construction work schedule and that this reduction would range from 0 to -0.7 dBA. However, construction with the extended construction hours would still exceed the 5 dB significance criterion along three of the four analyzed roadway segments; therefore, construction-period roadway noise impacts would be considered significant and unavoidable, as concluded in the Draft EIR. In the event that the extended summer construction hours during Phase 2 occurred in conjunction with implementation of the alternative construction schedule, discussed above, impacts would be consistent with that discussed herein, as the alternative schedule would only change the order of construction activities and not any construction activity levels.

3. Transportation and Circulation

An analysis of the extended construction hours was conducted to determine whether the traffic impacts associated with project construction would vary from those disclosed in Section IV.J, Transportation and Circulation of the Draft EIR. The analysis used the same methodology, significance thresholds, project assumptions (except for construction end times), and existing and cumulative traffic volumes as the construction traffic analysis presented in the Draft EIR.[34]

It was conservatively assumed that all project construction workers would remain on-site for extended work hours every day during the summer months. No new or additional workers would be present on-site, thus the number of total daily trips generated by construction workers and supervisors traveling to/from the project site would remain the same as analyzed in the Draft EIR. Only the distribution of such trips throughout the latter part of the day would change as a result of the extended construction hours, as shown in revised Table 18 of Appendix L, Traffic Impact Study, provided in Subsection G, Corrections and Additions, below. (Such changes are also reflected for the alternative construction phasing schedule in Table X-1 provided in Appendix 3 of this Final EIR.) This would be true under the potential alternative phasing schedule, if implemented, as well, since only the years during which Phase 2 summers would fall would be different.

During the summers when extended work hours are in effect, construction workers would leave the project site outside of the typical commuter P.M. peak hour period (4:00 P.M. to

[34] *Refer to Section II, Subsection G, Corrections and Additions of this Final EIR, for corrections to the baseline traffic volumes and estimated project trip generation levels, which were necessary based on corrections to the daily traffic counts originally presented in the Draft EIR.*

Table II-8

Calculated Future Traffic Noise Levels During Construction for Phase 2
Comparison of Original Construction Schedule and Extended Summer Construction Hours

	Calculated Future Hourly L_{eq} at 50 Feet from Roadway Right-of-Way				
Roadway Segment	Baseline (Year 2006) Peak Hour L_{eq}	Baseline with Construction Peak Hour L_{eq} [a]	Roadway Noise Impact Max L_{eq} Increase	Baseline with Extended Construction Hours Peak Hour L_{eq} [a]	Roadway Noise Impact Max L_{eq} Increase [a]
Stansbury Avenue, between School Gate and Valley Vista Boulevard	56.7	64.9	+13.0	64.4	+12.5
Stansbury Avenue, north of Valley Vista Boulevard	57.0	64.0	+11.1	63.5	+10.4
Valley Vista Boulevard, west of Stansbury Avenue	57.1	61.4	+7.3	61.4	+7.3
Valley Vista Boulevard, East of Stansbury Avenue	55.8	58.4	+4.1	58.4	+4.1

[a] *Peak Hour L_{eq} may occur at different times of the day. Maximum L_{eq} increase may not occur during the peak hour scenario.*

Source: PCR Services Corporation, 2007.

6:00 P.M.), when ambient traffic volumes would be reduced. As such, local roadway conditions would be better than the ambient conditions occurring when construction workers leave the site by 5:00 P.M. Thus, during the extended work hour periods, the impact of project construction worker-generated trips on the surrounding roadway system (both intersection and roadway segment impacts) would be reduced or equivalent to that determined in the Draft EIR. This would be true under the potential alternative phasing schedule as well.

It was assumed that construction deliveries could occur until 7:00 P.M. during the first summer of Phase 2, but that such late deliveries would not occur during the second summer period when only interior construction activities would take place after 5:00 P.M. The number of total daily deliveries would remain the same as analyzed in the Draft EIR. Only the distribution of delivery-related trips throughout the latter part of the day would change as a result of the extended construction hours, as shown in revised Table 18 of Appendix L, Traffic Impact Study, provided in Subsection G, Corrections and Additions, below. (Such changes are also reflected for the alternative construction phasing schedule in Table X-1 provided in Appendix 3 of this Final EIR.) This would also be true under the potential alternative phasing schedule.

In summary, transportation and circulation impacts associated with the extended construction hours would not be substantially different from or greater than those disclosed in the Draft EIR. Late hour construction during the summer months of Phase 2 would not result in any new significant impacts or substantially increase the severity of any previously identified

significant impacts. This would be true under the original construction schedule contemplated in the Draft EIR, as well as the potential alternative phasing schedule discussed above.

F. CORRECTIONS TO THE SCHOOL'S AVERAGE DAILY TRAFFIC VOLUMES

As discussed in Section IV.J, Transportation and Circulation and Appendix L, Traffic Impact Study of the Draft EIR, in order to evaluate existing traffic conditions, traffic counts were conducted in October 2004 for each of the ten study intersections while school was in full session during a typical school week. In addition to manual counts conducted by personnel from a traffic data collection company, automated 24-hour traffic counts were collected on October 25, 26 and 27, 2004 at the School's two existing driveway locations on Stansbury Avenue and Camino de la Cumbre. The counts on these three days included all vehicles exiting and entering the School during normal school operating conditions. The School's existing average daily traffic volume at each driveway was determined based on the worst-case day of the three, which was Wednesday, October 27, 2004 at the Stansbury driveway and Monday, October, 25, 2004 at the Camino de la Cumbre driveway.[35] The traffic analysis provided in the Draft EIR used this data as the basis for projecting the School's project trip generation rates and volumes, and associated mitigation and self-imposed trip caps.

Following publication of the Draft EIR, it was determined that a mechanical error occurred at the Stansbury Avenue driveway counter between 4:30 P.M. and 4:45 P.M. on Wednesday, October 27, 2004, yielding an anomaly within the count data.[36] This error resulted in an overstated vehicular trip count, which in turn caused an overestimation of existing daily trips, an overprojection of future project-related trips, and consequently an overstatement of residential street segment impacts. The data associated with the error has been corrected herein, as explained in the discussion that follows, in consultation with and approval by LADOT.[37] By correcting this error, the project would be subject to a lower trip cap against which the City would measure the School's compliance with its voluntary 40 percent daily project trip reduction specified in Mitigation Measure IV.J-4. Further, correction of this error would not result in the provision of any lesser level of mitigation than previously provided in the Draft EIR.

In light of the mechanical error, it was determined that the automated 24-hour count on that day at the Stansbury driveway should be excluded from the analysis. Therefore, the average daily traffic volume at the Stansbury driveway has been revised herein based on a two-day

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[35] *See Appendix E to Appendix L, Traffic Impact Study, of the Draft EIR for corresponding data.*

[36] *This anomaly also could have been due to a possible typographical error. In any case, the error has been corrected herein.*

[37] *Refer to the traffic assessment letter provided by LADOT, dated July 11, 2007 and included within Appendix 3 of this Final EIR. (Note that LADOT's letter is incorrectly dated therein as June 11, 2007, but was actually issued on July 11, 2007.) Also refer to the technical letter therein which further explains the error, subsequent correction, and revised impact discussion.*

average of the remaining two days of count data, October 25 and 26, 2004.[38] The average daily traffic volume at the driveway on Camino de la Cumbre has also been revised herein based on a three-day average of all three days of data, since no mechanical errors at the Camino counter were detected.[39] The peak hour trip generation rates were not revised because they were based on manual traffic counts conducted at the Stansbury Avenue and Camino de la Cumbre driveways and the off-site Fashion Square Lot on Monday, October 25, 2004 and were therefore not affected by the daily count mechanical error at the Stansbury Avenue driveway. Subsection G, Corrections and Additions, below includes corrections to Section IV.J, Transportation and Circulation, and Appendix L, Traffic Impact Study, of the Draft EIR to reflect the revised existing average daily traffic volumes, as well as the School's projected project trip generation rates and volumes, the related impact analysis, associated required mitigation, and self-imposed trip caps. An updated Draft TDM Plan incorporating these changes is provided in Appendix 3 to this Final EIR.

To summarize the changes, the total daily vehicle trip estimate for the School is now based on the sum of a two-day average of 24-hour automated counts conducted at the existing driveway on Stansbury Avenue, a three-day average of 24-hour automated counts conducted at the existing driveway on Camino de la Cumbre, and an estimate of total School-related daily vehicle trips at the off-site Sherman Oaks Fashion Square parking lot.[40] The revised 2,603 total daily vehicle trip average (previously 3,082 trips in the Draft EIR) equates to a daily trip generation rate of 3.47 vehicle trips per student (previously 4.11 in the Draft EIR), once divided by the current enrollment of approximately 750 students. The estimated number of project-related vehicle trips, based on the revised trip generation factor, is 278 trips (previously 329 trips in the Draft EIR). All School-related peak hour trip volumes cited in the Draft EIR remain unchanged.

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[38] *The 24-hour count data for the Stansbury driveway on October 25 and 26, 2004 were carefully reexamined for anomalies and none were identified. As the data for these two days were found to be reasonable and consistent, they were averaged, which is a standard procedure generally used when such data are similar. This averaging procedure, as opposed to using the next highest count day (i.e., October 26, 2004), does not change impact results, but rather is more reflective of average conditions by taking more than one day of data into account. These changes were made in consultation with and approval by LADOT, as demonstrated in their traffic assessment letter dated July 11, 2007, included within Appendix 3 of this Final EIR. (Note that LADOT's letter is incorrectly dated therein as June 11, 2007, but was actually issued on July 11, 2007.)*

[39] *For purposes of consistency, the 24-hour data for the Camino de la Cumbre driveway were also averaged. The three-day average of the October 25, 26 and 27, 2004 count data for this driveway was used as no mechanical error was discerned.*

[40] *Total daily vehicle trips at the off-site Sherman Oaks Fashion Square parking lot were estimated by multiplying the sum of the A.M., School P.M., and Commuter P.M. peak-hour manual traffic count volumes by a ratio of the daily traffic volumes at the Stansbury Avenue driveway divided by the sum of the A.M., School P.M., and Commuter P.M. peak-hour manual traffic count volumes at the Stansbury Avenue driveway This methodology is described further in Appendix L of the Draft EIR and was approved by LADOT.*

As demonstrated in the revised analysis provided below in Subsection G, Corrections and Additions, using these new values, the traffic impacts that are based on daily vehicle trips (i.e., the residential street impact analysis) would be reduced as compared to the impacts disclosed in the Draft EIR (refer to the corrections to Table IV.J-9 below for specific data). Consequently, no significant traffic impacts would occur on any of the eight residential street segments analyzed. Additionally, with the project's lower trip generation level, the School would be subject to a lower voluntary trip cap associated with project-related trips.[41] With implementation of a 40 percent reduction in project-related daily trips, as specified in Mitigation Measure IV.J-4, the School would be required to reduce project-related daily trips by 111 trips, resulting in the addition of 167 project-related daily trips over existing conditions. This contrasts with the values based on data in the Draft EIR, which would have required a reduction of 132 project-related daily trips, for a total maximum increase of 197 project-related daily trips over existing conditions. Although the 40 percent reduction in project trips would no longer be required to mitigate residential street impacts (since such impacts would be less than significant), nor would it be required to mitigate the project's intersection impact at Valley Vista and Beverly Glen (since trip reductions during the A.M. and school P.M. peak hours would fully mitigate that impact), the measure would still be implemented on a voluntary basis. Thus, impacts after mitigation would be reduced as compared to those disclosed in the Draft EIR.

It is further noted that the intersection impact analysis has not changed, as daily project trips are not factored into that analysis. The intersection impact analysis is based on the project's peak-hour trip generation only, which as discussed above did not change. Similarly, the construction impact analysis has not been revised in relation to these changes, as daily project trips are not factored into that analysis either. Please refer to Subsection G, Corrections and Additions, below for further discussion and specific corrections.

G. CORRECTIONS AND ADDITIONS

This section of the Final EIR provides changes to the Draft EIR that have been made to provide clarification or corrections as a result of public and agency comments or new information. Deletions are shown with ~~strikethrough~~ and additions are shown with <u>underline</u>. Such changes to the Draft EIR are indicated below under the appropriate EIR section or appendix heading.

[41] *A reduction in daily project-related trips would not be required as mitigation since significant impacts to residential street segments would not occur. The School has nonetheless volunteered to reduce daily project-related trips by 40 percent, as reflected in Mitigation Measure J-4. In addition, the School would be required to implement trip reductions during the A.M. and school P.M. peak hours to mitigate project-related intersection impacts.*

I. Summary

Section I, Summary, of this Final EIR incorporates revisions to Volume I, Section I, Summary, of the Draft EIR based on comments received on the Draft EIR and the corresponding responses to comments (see Section III, Responses to Written Comments, of this document), as well as the corrections and additions provided below.

II. Project Description

Volume I, Section II, Project Description, page 56, change the fifth sentence in the first full paragraph as follows:

More specifically, the project's proposed facilities would include expanded classrooms, specialized science facilities, performing and visual arts facilities, a new library, a multi-purpose room with ~~retractable~~ seating, a new food preparation/servery area, additional athletic spaces, departmental and administrative offices, storage facilities, and other support facilities.

Volume I, Section II, Project Description, page 58, change the first sentence in the first paragraph as follows:

Phase 1 would include construction of the new Library and Technology Center Building, which would include uses such as a library, ~~a food preparation/servery area,~~ administrative space, ~~approximately two~~ and classrooms~~, and storage space~~.

Volume I, Section II, Project Description, top of page 61, change the first (partial) sentence in the first (partial) paragraph as follows:

traditional classroom spaces; new specialized spaces for visual art, science, and performing arts instruction, as well as performing arts practice rooms; other support facilities; and a multi-purpose room with ~~retractable~~ seating for up to approximately 392 people.

Volume I, Section II, Project Description, page 65, change the first sentence in the second full paragraph as follows:

Activities associated with Phase 3 would occur ~~intermittently~~ over the course of approximately two and a half years, with construction of a total of approximately 15,510 square feet of floor area.

Volume I, Section II, Project Description, page 66, change the last sentence in the first paragraph as follows:

New wrought iron gates would be installed at the Stansbury Avenue and Camino de la Cumbre entrances, with the latter recessed by approximately 20 feet to ~~eliminate~~ reduce conflicts associated with an existing blind curve at the driveway.

Volume I, Section II, Project Description, page 67, revise the second and third sentences in the second full paragraph as follows:

In addition, the School is requesting a modest increase in enrollment beginning in the 2008–2009 school year with an initial enrollment increase of ~~20~~ 10 students, followed by an increase of 10 students in the 2009–2010 school year. ~~A phased enrollment increase of 20 students per year would follow beginning in the 2012–2013 school year and continuing for three years, until~~ The remaining increase could occur upon completion of the new Middle and Upper School Main Academic Center, with the maximum enrollment cap of 830 students ~~is~~ reached in the 2014–2015 school year.[42]

Volume I, Section II, Project Description, page 68, change the fifth sentence in the first paragraph as shown below (including changes to footnote 30, listed here as footnote 8), then insert the new sentence that follows:

Additionally, the School may be open for extra-curricular activities ~~and meetings~~ and events where parents, visitors and/or guests are in attendance some evenings Monday to Friday until 10:30 P.M. (eight times per month, generally not to exceed two nights per week), as well as some Saturdays from 8:00 A.M. to 11:00 P.M. and some Sundays from 10:00 A.M. to ~~8:00~~ 6:00 P.M. (for a combined ~~24~~ 21 weekend days per year).[43] Outdoor mechanized maintenance activities would be limited to between 7:00 A.M. and 8:30 P.M. on weekdays and between 8:00 A.M. and 7:00 P.M. on weekends, except in emergency repair situations.

Volume I, Section II, Project Description, page 68, change the first and second sentences in the second paragraph as follows:

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[42] *The School has volunteered a condition that it would not request another enrollment increase for a period of 20 years from the issuance of a Certificate of Occupancy for the Middle and Upper School Main Academic Center. As part of its application, the School has proposed that this project feature be imposed as a binding condition of approval, subject to approval of the decision-makers.*

[43] *Exceptions to the days and hours permitted for extra-curricular activities and events are specified in Section IV.H, Land Use, of this EIR. Extra-curricular activities involving only students, faculty, administration and/or parent volunteers assisting with the activity (but not including visitors or guests) may continue to occur on all other weekend days from 8:00 A.M. to 6:00 P.M. and shall be limited to up to 100 people and to indoor activities on Sunday. As part of its application, the School has proposed that this project feature be imposed as a binding condition of approval, subject to approval of the decision-makers.*

Construction of the project would be completed in three phases, based on the project components described above, over the course of approximately ~~three and a half~~ five years, spread out over a six and a half year timeframe. Anticipated construction schedules are as follows: Phase 1 – two months of preparatory work beginning in March 2009, then approximately 12 months beginning in May 2009; Phase 2 – two months of preparatory work beginning in March 2011, then approximately 18 months beginning in May 2011; Phase 3 – two months of preparatory work beginning in March 2013, then approximately ~~12 months of construction occurring over a two-~~ and a half years ~~period~~ of interior and/or exterior activities beginning in May 2013.

Volume I, Section II, Project Description, page 69, change the fifth through seventh sentences of the third full paragraph as follows:

Overall, grading would require an estimated ~~15,674~~ 20,341 cubic yards of cut and an estimated ~~15,674~~ 19,503 cubic yards of fill, with nominal (i.e., less than 1,000 cubic yards) soil import and export.[44] All grading activities would comply with applicable City of Los Angeles grading requirements. This near balance in cut and fill operations would be achieved by utilizing cut materials from throughout the developed portion of the campus to raise the level of the athletic field by approximately 10 inches and/or to fill in the area surrounding the proposed Parking Facility, raising finished grade in that area by as much as 20 feet in some locations.

Volume I, Section II, Project Description, page 70, make the following changes to the third bullet point and add sub-point c., shown below:

- Pursuant to LAMC §12.24F, a Modification of the height and area regulations to allow:

  a. two buildings to exceed the maximum 36 feet permitted in a residential hillside zone as established by LAMC §12.21A 17(c); ~~and~~

  b. landscaping, hedges and fences/gates/walls up to 10 feet in height within the required yards at the Stansbury Avenue and Camino de la Cumbre entrances in lieu of the maximum three and one-half feet otherwise permitted in the front yard and six feet otherwise permitted in the side yard in a hillside zone pursuant to LAMC §12.22C 20; and

  c. existing accessory structures and parking areas along the Camino de la Cumbre frontage to be repaired, renovated and maintained within required yards.

[44] *The grading quantities have been revised based on the development of more detailed construction plans that were not available at the time the Draft EIR was published. This change would not otherwise affect the daily schedule or overall duration of construction, as described in the Draft EIR.*

IV.A. Aesthetics, Views, and Light and Glare

Volume I, Section IV.A, Aesthetics, Views and Light and Glare, page 106, at the end of the first (partial) paragraph at the top of the page, add the following text and delete footnote 52:

While the existing chain link fencing around portions of the site perimeter, including along Camino de la Cumbre, would remain in place, the School plans to remove the barbed wire portions of the fencing along Camino de la Cumbre as part of the project.

~~[52] *The existing fencing around portions of the site perimeter, including along Camino de la Cumbre, would remain in place*~~

Volume I, Section IV.A, Aesthetics, Views and Light and Glare, page 106, change the third sentence in the second full paragraph as follows:

As shown in Figure IV.A-9, the landscape plan provides for 90 new native trees, including coast live oak, California sycamore, crape myrtle, sweetgum, toyon, Arbutus 'Marina' and other native shrubs and vines throughout the campus, thus exceeding the City's required two-to-one replacement basis at a ratio of three-to-one new trees.

Volume I, Section IV.A, Aesthetics, Views and Light and Glare, page 110, change the third sentence in the second bullet item as follows:

The area would be buffered, to the extent practicably feasible, so as not to result in noise, odor or debris impacts on any adjacent uses.

Volume I, Section IV.A, Aesthetics, Views and Light and Glare, page 123, change the third sentence in the paragraph under Consistency with Guideline, for Guideline 6, as follows:

New wrought iron gates would be installed at the Stansbury Avenue and Camino de la Cumbre entrances, with the latter recessed by approximately 20 feet to ~~eliminate~~ reduce conflicts associated with an existing blind curve at the driveway.

Volume I, Section IV.A, Aesthetics, Views and Light and Glare, page 123, add the following sentence to the end of the paragraph under Consistency with Guideline, for Guideline 6:

Nonetheless, the School plans to remove the barbed wire as part of the project.

IV.B. Air Quality

Volume I, Section IV.B, Air Quality, page 157, change the first and second sentences in the second full paragraph (after the bullet points) as follows:

The three general phases of construction would occur over the course of approximately ~~three and a half~~ five years, spread out over a six and a half year timeframe. Anticipated construction schedules are as follows: Phase 1 – two months of preparatory work beginning in March 2009, then approximately 12 months beginning in May 2009; Phase 2 – two months of preparatory work beginning in March 2011, then approximately 18 months beginning in May 2011; Phase 3 – two months of preparatory work beginning in March 2013, then approximately ~~12 months of construction occurring over a~~ two- and a half years ~~period~~ of interior and/or exterior activities beginning in May 2013.

Volume I, Section IV.B, Air Quality, page 158, change the fourth sentence in the second full paragraph as follows:

Overall, grading would require an estimated ~~15,674~~ 20,341 cubic yards of cut and an estimated ~~15,674~~ 19,503 cubic yards of fill, for a nearly balanced site in terms of earthwork.[45]

IV.C. Biological Resources

Volume I, Section IV.C, Biological Resources, page 183, add the following to the end of the third paragraph:[46]

An updated tree survey was conducted on March 9, 2007 by Joanna Nigro and verified by PCR Wetland Ecologist/ISA Certified Arborist Richard Haywood. Details of the methodology and findings of the tree survey can be found in the Tree Survey Report prepared by PCR (updated March 2007), attached as Appendix 4 to this Final EIR.

[45] *The grading quantities have been revised based on the development of more detailed construction plans that were not available at the time the Draft EIR was published. This change would not otherwise affect the daily schedule or overall duration of construction, as described in the Draft EIR. The construction-related air quality analysis presented in the Draft EIR was sufficiently conservative to accommodate the new grading quantities, and thus, there would be no change to the impact conclusions presented therein. Specifically, the analysis of PM_{10} was based on the total acreage disturbed not precise grading volumes, additional equipment would not be necessary on-site to perform the additional grading, and a conservative number of truck trips was assumed to accommodate any import/export. No new significant air quality impacts or substantial increase in the severity of significant impacts previously identified in the Draft EIR would occur as a result of the revised grading quantities.*

[46] *These revisions are based on the updated Tree Survey Report, provided as Appendix 4 of this Final EIR, due to City of Los Angeles requirements that tree survey data be current as of within six months.*

Volume I, Section IV.C, Biological Resources, page 183, make the following revisions to the last paragraph:[47]

A total of ~~224~~ 257 trees, ~~98~~ 97 native and ~~126~~ 160 non-native, were assessed within the tree survey area, which includes the area defined by the proposed limits of grading and a 20-foot buffer area.[48] Native trees include 37 coast live oak trees, ~~59~~ 58 California black walnut trees, and two California sycamores, as shown in Table IV.C-3, *Tree Inventory,* on page 186. On average, all trees were in fair condition physiologically, structurally, and aesthetically.

Volume I, Section IV.C, Biological Resources, page 185, make the following revisions to the first paragraph:[49]

A total of ~~11~~ 13 of the 37 coast live oak trees assessed within the tree survey area are considered in good overall condition. Five of the ~~59~~ 58 California black walnut trees were in overall good condition, and both California sycamores were in fair condition. Of the ~~126~~ 160 non-native ornamental trees scattered throughout the tree survey area, the majority within the tree survey area are in fair overall condition, with some structural deformities, while 22 were found to be in good overall condition.

Volume I, Section IV.C, Biological Resources, page 186, replace Table IV.C-3 with Table 1, *Tree Inventory*, provided in Appendix 4 of this Final EIR.[50]

Volume I, Section IV.C, Biological Resources, page 199, make the following revisions to the second sentence of the first full paragraph:[51]

Based on the review of relevant literature, the review of data on sensitive habitats and species in the region (e.g., CNDDB), the presence of a limited amount native vegetation within the area to be developed (~~0.22~~ 0.6 acre of California walnut-coast live oak woodland, ~~0.02~~ less than 0.1 acre of coast goldenbush grassland, and less than ~~0.01~~ 0.1 acre of coyote brush scrub), the location of proposed development within currently developed areas, and the abundance of non-native ornamental landscaping, the project would not result in the loss of individuals, or the reduction

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[47] *Ibid.*

[48] *The number of surveyed trees has changed as a result of updating the Tree Survey Report (provided as Appendix 4 of this Final EIR), since trees change and grow over time and older surveys may not have counted borderline sized trees. This fact is accounted for in the City's requirement that tree survey data be current as of within six months.*

[49] *These revisions are based on the updated Tree Survey Report, provided as Appendix 4 of this Final EIR, due to City of Los Angeles requirements that tree survey data be current as of within six months.*

[50] *Ibid.*

[51] *Ibid.*

of existing habitat, of a local, State or Federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern.

Volume I, Section IV.C, Biological Resources, page 202, make the following revisions to the second paragraph:[52]

A total of ~~57~~ 80 trees will be directly impacted by the proposed project as detailed in Table IV.C-6, *Tree Impacts*, on page 203 and shown in Figure IV.C-5, *Tree Impacts*, on page 205.[53] These trees would require removal and include up to ~~18~~ 28 native trees (~~4~~ 8 coast live oak trees, and ~~14~~ 20 California walnut trees) and ~~39~~ 52 non-native trees. None of the ~~57~~ 80 trees proposed for removal are recommended for transplanting. A total of ~~44~~ 37 trees will be partially impacted by the proposed project, including ~~20~~ 21 native trees (~~5~~ 9 coast live oak trees, ~~13~~ 11 California walnut trees, and ~~2~~ 1 California sycamore tree) and ~~24~~ 16 non-native trees.[54,55] These trees would not be removed, but may require protective measures during construction. An additional ~~26~~ 36 trees, as detailed in the Tree Survey Report, would also potentially be impacted but not to a point that the tree would need to be removed. These include ~~11~~ 19 native trees (7 coast live oak, ~~and 4~~ 11 California walnut trees, and 1 California sycamore) and ~~15~~ 17 non-native trees. As discussed in the Tree Survey Report, ~~49~~ 29 native trees within the survey area and ~~48~~ 75 non-native trees within the survey area would be avoided by the proposed improvements. The mitigation measures provided below will ensure that the ~~70~~ 73 partially and potentially impacted trees are protected during construction. With implementation of the mitigation measures provided below, impacts to protected trees would be reduced to less than significant levels.

Volume I, Section IV.C, Biological Resources, page 203, replace Table IV.C-6 with Table 2, *Impacts to Trees*, provided in Appendix 4 of this Final EIR.[56]

Volume I, Section IV.C, Biological Resources, page 205, replace Figure IV.C-5 with Figure 2, *Impacts to Trees*, provided in Appendix 4 of this Final EIR.[57]

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[52] *Ibid.*

[53] *The number of surveyed trees has changed as a result of updating the Tree Survey Report (provided as Appendix 4 of this Final EIR), since trees change and grow over time and older surveys may not have counted borderline sized trees. This fact is accounted for in the City's requirement that tree survey data be current as of within six months.*

[54] *Partially impacted trees include trees which may be impacted within the 5' buffer zone of the tree canopy.*

[55] *Fewer trees would be impacted if the Aquatic Center is developed at the current outdoor basketball and weight facility located at the northeast corner of the athletic field.*

[56] *These revisions are based on the updated Tree Survey Report, provided as Appendix 4 of this Final EIR, due to City of Los Angeles requirements that tree survey data be current as of within six months.*

IV.D. Cultural Resources

Volume I, Section IV.D, Cultural Resources, page 212, change the fourth sentence in the first paragraph under the heading "c. Project Features" as follows:

As discussed further in Section IV.E, Geology, earthwork for the project would involve approximately ~~15,674~~ 20,341 cubic yards of cut material and approximately ~~15,674~~ 19,503 cubic yards of fill material, with nominal (i.e., less than 1,000 cubic yards) soil import and/or export, for a nearly balanced site in terms of earthwork.[58]

IV.E. Geology

Volume I, Section IV.D, Cultural Resources, page 225, change the first sentence in the second paragraph under the heading "c. Project Features" as follows, and retain the existing footnote plus add the new footnote shown below:

As illustrated in Figure IV.E-2 on page 226, grading for the project would involve an estimated ~~15,674~~ 20,341 cubic yards of cut and ~~15,674~~ 19,503 cubic yards of fill, with nominal (i.e., less than 1,000 cubic yards) soil import and/or export.[59]

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[57] *These revisions are based on the updated Tree Survey Report, provided as Appendix 4 of this Final EIR, due to City of Los Angeles requirements that tree survey data be current as of within six months.*

[58] *The grading quantities have been revised based on the development of more detailed construction plans that were not available at the time the Draft EIR was published. This change would not otherwise affect the daily schedule or overall duration of construction, as described in the Draft EIR. The cultural resource analysis presented in the Draft EIR was sufficiently conservative to account for such a change, particularly since such impacts are related to the area and depth of grading, not the actual earthwork volumes. No new significant paleontological impacts or substantial increase in the severity of significant impacts previously identified in the Draft EIR would occur as a result of the revised grading quantities.*

[59] *The grading quantities have been revised based on the development of more detailed construction plans that were not available at the time the Draft EIR was published. This change would not otherwise affect the daily schedule or overall duration of construction, as described in the Draft EIR. The geotechnical analysis presented in the Draft EIR was sufficiently conservative to account for such a change, particularly since such impacts are related to the area and depth of grading and soil characteristics, and are not dependent solely on the actual earthwork volumes. No new significant geological impacts or substantial increase in the severity of impacts previously identified in the Draft EIR would occur as a result of the revised grading quantities.*

IV.F. Hazards and Hazardous Materials

Volume I, Section IV.F, Hazards and Hazardous Materials, page 242, revise the first and second paragraphs as follows:

In addition, new wrought iron gates would be installed at the Stansbury Avenue and Camino de la Cumbre entrances, with the latter recessed by approximately 20 feet to ~~eliminate~~ reduce conflicts associated with an existing blind curve at the driveway. The recessed gate on Camino de la Cumbre would allow delivery trucks and other vehicles to exit the roadway and wait on school property while obtaining security clearance. The recess would also allow exiting vehicles to be outside the secured perimeter of the School where they can carefully check road conditions prior to pulling out onto Camino de la Cumbre.

In the event that evacuation of the entire campus is required, emergency evacuation procedures would be undertaken by the School. Specifically, all students, faculty, and staff would gather in fire drill lines for attendance in the school parking lot. Students would then be escorted on foot to the off campus evacuation site at Van Nuys-Sherman Oaks Park on Huston Street, just west of Hazeltine Avenue and north of Riverside Drive.[60] School faculty and staff would facilitate the safe crossing of the students at major intersections. As part of these procedures, only emergency vehicles would be allowed on/off campus and parents would pick up their children at the off campus evacuation site. An alternate evacuation area has also been designated at the surface parking lot on Hazeltine and Ventura Boulevard. Under these circumstances a disaster situation broadcast system would be used to notify parents of evacuation procedures. Specifically, the School contracts with an out-of-state emergency broadcast system that if activated sends out a message about evacuation details and the designated off-site meeting location. To initiate this system, phone contact is made by the School (by cell phone or a land line with battery back up power) to record an emergency message, then the message is sent by the provider to all home, work, and cell phone numbers listed with the School for parents, faculty, and staff. The School's emergency evacuation plan would be subject to LAFD review and approval. The plan shall be included in the Department of City Planning file for the project and distributed to the applicable City Council District Office, Sherman Oaks Homeowner's Association, Sherman Oaks Neighborhood Council, and a list of neighbors mutually agreed upon with the Sherman Oaks Homeowners Association (SOHA), including all homes on Stansbury Avenue south of Ventura Boulevard.

[60] *The designation of Van Nuys-Sherman Oaks Park as the primary off-site evacuation site was determined in conjunction with LAFD.*

Additionally, the LAFD has indicated that evacuation may not always be optimal depending on the nature of an emergency. Under certain circumstances "secure in place" methods may be implemented such that students, faculty and administrators are kept on the campus in a secure location. Under this scenario the School's emergency broadcast system would be activated to notify families and communicate appropriate action. Further, in other emergency instances the School may be asked to provide shelter for the community.

IV.G. Hydrology

Volume I, Section IV.G, Hydrology, page 253, change the first sentence in the second paragraph under the heading "(1) Construction" as follows, and retain the existing footnote plus add the new footnote shown below:

More specifically, project construction would involve an estimated ~~15,674~~ 20,341 cubic yards (cy) of cut material and an estimated ~~15,674~~ 19,503 of fill, with nominal (i.e., less than 1,000 cubic yards) of soil import and/or export for a nearly balanced site in terms of earthwork.[61]

IV.H. Land Use

Volume I, Section IV.H, Land Use, page 270, add the following at the end of the first bullet point under "Project Features":[62]

Additionally, the School has volunteered a condition of approval allowing for public use of the campus (except for the swimming pool) by neighbors located within the boundaries of the Sherman Oaks area, which would benefit the surrounding community. As such, the rental, lease, or use of the campus facilities by anyone other than The Buckley School, related organizations such as the parents' association, or neighborhood groups (as approved by The Buckley School) shall be prohibited, with the exception of up to 14 commercial film shoots per year pursuant to Municipal Code Section 12.22 A.13.

[61] *The grading quantities have been revised based on the development of more detailed construction plans that were not available at the time the Draft EIR was published. This change would not otherwise affect the daily schedule or overall duration of construction, as described in the Draft EIR. The hydrology analysis presented in the Draft EIR was sufficiently conservative to account for such a change, and the project would still adhere to all necessary NPDES requirements. No new significant hydrology impacts or substantial increase in the severity of impacts previously identified in the Draft EIR would occur as a result of the revised grading quantities; hydrology impacts would remain less than significant.*

[62] *As part of its application, the School has proposed that this project feature be imposed as a binding condition of approval, subject to approval of the decision-makers.*

Volume I, Section IV.H, Land Use, page 270, add the following at the end of the second bullet point under "Project Features":[63]

The School shall designate a Community Liaison and notify a list of neighbors mutually agreed upon with the Sherman Oaks Homeowners Association (SOHA), including all homes on Stansbury Avenue south of Ventura Boulevard, by August 15 of each year, stating the name and telephone number of the School representative to contact in the event of traffic, parking, construction, noise, trash can removal or other issues.

Volume I, Section IV.H, Land Use, page 273, change the first dashed bullet point at the top of the page as follows:[64]

The campus may be open for extra-curricular activities ~~and meetings~~ and events where parents, visitors and/or guests are in attendance until 10:30 P.M. on eight weekday nights (Monday through Friday) each month, not to exceed two nights per week, as well as some Saturdays from 8:00 A.M. to 11:00 P.M. and some Sundays from 10:00 A.M. to ~~8:00~~ 6:00 P.M. for a combined ~~24~~ 21 weekend days per year.[65] Extra-curricular activities involving only students, faculty, administration and/or parent volunteers assisting with the activity (but not including visitors or guests) may continue to occur as presently allowed on all other weekend days from 8:00 A.M. to 6:00 P.M. and shall be limited to a maximum of 100 people and limited to indoor activities on Sunday.[66]

Volume I, Section IV.H, Land Use, page 273, change the third sentence in the fourth dashed bullet point as follows:[67]

However, such tournaments shall count toward one of the ~~24~~ 21 weekend days if occurring on a Saturday, but may not occur on a ~~and/or~~ Sunday.

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[63] *Ibid.*

[64] *Ibid.*

[65] *The Fall and Spring Performing Arts productions shall not be subject to the two night per week limitation or these hours, as is currently the case. Of the eight weekday nights each month when campus may be open until 10:30 P.M., no more than six such evening events per month shall include over 100 attendees.*

[66] *No events with over 100 attendees shall be held on any consecutive Saturday and Sunday, with the exception of the Annual Fair.*

[67] *As part of its application, the School has proposed that this project feature be imposed as a binding condition of approval, subject to approval of the decision-makers.*

Volume I, Section IV.H, Land Use, page 274, insert the following dashed and regular bullet points after the last dashed bullet item near the top of the page:[68]

- Outdoor mechanized maintenance activities shall be limited to between 7:00 A.M. and 8:30 P.M. on weekdays and between 8:00 A.M. and 7:00 P.M. on weekends, except in emergency repair situations.

- Loading and delivery hours shall be limited to 8:00 A.M. to 5:00 P.M. Monday through Friday, except in connection with loading activities associated with the Annual Fair.

- As part of the project, the Buckley School has proposed a Neighborhood Protection Plan and Fund, designed to create a formal mechanism for addressing issues of community concern that may arise during the construction and operation of the School. The Plan shall be developed in consultation with the City Planning Department, LADOT, and the applicable Council District Office(s). The Plan may include traffic, landscaping and buffering, as well as other improvements of possible concern to the neighbors and community that may be brought to the attention of the Planning Department, LADOT, the applicable Council District Office(s), the School, or a Neighborhood Committee established as part of the Plan. The Neighborhood Committee shall be comprised of the Applicant's designated community liaison and representatives of the Sherman Oaks Homeowners Association, the applicable Council Office(s), the Sherman Oaks Neighborhood Council, and other interested community stakeholders.

Volume I, Section IV.H, Land Use, page 280, change the second complete sentence in the first (partial) paragraph after Table VI.H-1 as follows:[69]

Additionally, as described in more detail in the project features above, the School would be open for extra-curricular activities and events where parents, visitors and/or guests are in attendance until 10:30 P.M. on up to eight weekday nights (Monday through Friday) each month, not to exceed two nights per week, as well as some Saturdays from 8:00 A.M. to 11:00 P.M. and some Sundays from 10:00 A.M. to ~~8:00~~ 6:00 P.M. for up to a combined ~~24~~ 21 weekend days per year.[70] Extra-curricular activities involving only students, faculty, administration and/or parent volunteers assisting with the activity (but not including visitors or guests) may continue to occur

[68] *Ibid.*

[69] *Ibid.*

[70] *The Fall and Spring Performing Arts productions shall not be subject to the two night per week limitation or these hours, as is the currently case. Of the eight weekday nights each month when campus may be open until 10:30 P.M., no more than six such evening events per month shall include over 100 attendees.*

on all other weekend days from 8:00 A.M. to 6:00 P.M. and shall be limited to a maximum of 100 people and limited to indoor activities on Sunday.[71]

Volume I, Section IV.H, Land Use, page 287, change the second sentence of the first paragraph as follows:

Grading activities for the project would require an estimated ~~15,674~~ 20,341 of cut and ~~15,674~~ 19,503 cy of fill, with nominal (i.e., less than 1,000 cy) soil import and export.[72]

Volume I, Section IV.H, Land Use, page 288, change the sixth sentence of the first paragraph as follows:

Grading for the project would require an estimated ~~15,674~~ 20,341 of cut and approximately ~~15,674~~ 19,503 cy of fill, with nominal (i.e., less than 1,000 cy) soil import and export.[73]

IV.I. Noise

Volume I, Section IV.I, Noise, page 311, change the first full sentence at the top of the page as follows:

Construction of the project would be completed in three general phases, which would occur over the course of ~~three and a half~~ five years spread out over an approximately six and a half year timeframe.

Volume I, Section IV.I, Noise, page 311, change the sixth full sentence at the top of the page as follows:

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[71] *No events with over 100 attendees shall be held on any consecutive Saturday and Sunday, with the exception of the Annual Fair.*

[72] *The grading quantities have been revised based on the development of more detailed construction plans that were not available at the time the Draft EIR was published. This change would not otherwise affect the daily schedule or overall duration of construction, as described in the Draft EIR. The land use analysis presented in the Draft EIR would not be affected by the revised grading estimate since total grading would still be well below the maximum earthwork permitted by the MSPSP Outer Corridor regulations. No new significant land use impacts or substantial increase in the severity of impacts previously identified in the Draft EIR would occur as a result of the revised grading quantities; land use impacts would remain less than significant.*

[73] *The grading quantities have been revised based on the development of more detailed construction plans that were not available at the time the Draft EIR was published. This change would not otherwise affect the daily schedule or overall duration of construction, as described in the Draft EIR. The land use analysis presented in the Draft EIR would not be affected by the revised grading estimate since the construction of new buildings would still be concentrated in the previously developed or paved areas of the site and because all grading activities would comply with applicable City of Los Angeles grading requirements. No new significant land use impacts or substantial increase in the severity of impacts previously identified in the Draft EIR would occur as a result of the revised grading quantities; land use impacts would remain less than significant.*

Phase 3 would require two months of preparatory work beginning in March 2013, then approximately ~~12 months of construction occurring over a~~ two~~-~~ and a half years ~~period of~~ interior and/or exterior activities beginning in May 2013.

IV.J. Transportation and Circulation

Volume I, Section IV.J, Transportation and Circulation, page 333, change the fourth sentence in the fourth full paragraph as follows:

The average daily traffic volumes on Stansbury Avenue are approximately ~~2,500~~ 3,500 VPD north of Valley Vista Boulevard and ~~3,500~~ 2,500 VPD south of Valley Vista Boulevard.

Volume I, Section IV.J, Transportation and Circulation, page 348, Table IV.J-5, make the following change under the heading "Buckley School (K–12) per Student":

Daily: T = ~~4.11~~ 3.47 (S)

Volume I, Section IV.J, Transportation and Circulation, page 354, change the first sentence in the second full paragraph (after the bullet points) as follows:

As described in Section II, Project Description, of the EIR, construction for the proposed project would be completed in three basic phases over the course of ~~three and a half~~ five years, spread out over an approximately six and a half year timeframe ~~80-month period~~ beginning in May 2009 and ending in December 2015.

Volume I, Section IV.J, Transportation and Circulation, page 355, change the second full sentence at the top of the page as follows:

Finally, Phase 3 is expected to begin in May 2013 and would occur over the course of a two~~-~~ and a half year time period.

Volume I, Section IV.J, Transportation and Circulation, page 355, change the first sentence in the first full paragraph and add a new sentence and footnote as follows:

Construction during Phase 1, Phase 3, and most of Phase 2 would occur Mondays through Fridays from 7:00 A.M. to 5:00 P.M. and Saturdays from 8:00 A.M. to 5:00 P.M., except for management, supervisory, administrative, and inspection activities which may occur at other times, and when extended hours are required and specifically permitted by the City. During Phase 2, construction days and hours would be Monday through Friday, 7:00 A.M. to 5:00 P.M.

each day from September 2nd to April 30th; Monday through Friday, 7:00 A.M. to 7:00 P.M. from May 1st to September 1st; and Saturday, 8:00 A.M.to 5:00 P.M. throughout the year.[74]

Volume I, Section IV.J, Transportation and Circulation, page 358, change and replace the last sentence in the first (partial) paragraph as follows:[75]

In addition, the following project features are proposed as part of the project and supplement the Project Description:

- The School shall provide no less than three traffic monitors, including parking attendants and security personnel, ~~would continue~~ to direct traffic flow and the student drop-off/pick-up process at the arrival plaza, assure that school visitors, students and staff vehicles do not queue on the adjacent streets, block any public right-of-way and/or private driveways, or adversely affect traffic circulation for local residents. These monitors and assistants are to be positioned at the campus Stansbury Avenue entrance, parking garage entrances and throughout the on-campus queuing areas during each day that school is in session and for all activities and events (including but not limited to athletic events, open houses, performances and dances).

- The School shall institute a Parking Management Program for both school days and campus events listed on the School Events Calendar in order to prevent traffic congestion and circulation problems associated with drivers looking for and accessing parking. For daytime operation, faculty and staff shall be assigned to specific parking areas and/or spaces based on their typical scheduled arrival and departure times in order to minimize overlap of their ingress and egress with vehicle queues associated with the student drop-off and pick-up process. Parents shall be informed through the Student/Parent Handbook where visitor parking is located, as shall visitors upon their arrival to the campus by a driveway attendant. Prior to annually-scheduled school functions at the campus, traffic and parking instructions shall be issued if different from those contained in the Student/Parent Handbook, in order to clarify parking restrictions such as where vehicles will be permitted to enter and exit the school and any parking procedures particular to that function. The on-site parking and circulation area shall be staffed, as needed, to accommodate the size of a given function but shall include at least three monitors.

[74] *Once a building is fully enclosed, interior construction activities occurring between May 1st and September 1st during Phase 2 may continue until 9:00 p.m. on weekdays and 6:00 p.m. on Saturday.*

[75] *As part of its application, the School has proposed that this project feature be imposed as a binding condition of approval, subject to approval of the decision-makers.*

Volume I, Section IV.J, Transportation and Circulation, page 358, change the fourth sentence in the first full paragraph under the heading "(a) Intersections" as follows:

Phase 3 would be staged over a two- and a half year period beginning in May 2013, where Phase 3A would have a duration of approximately 12 months, after which both Phase 3B and Phase 3C would start.

Volume I, Section IV.H, Land Use, page 358, change the eleventh sentence in the first full paragraph under the heading "(a) Intersections" as follows:

During construction, grading would require an estimated ~~15,674~~ 20,341 of cut and an estimated ~~15,674~~ 19,503 cy of fill, for a nearly balanced site in terms of earthwork.[76]

Volume I, Section IV.J, Transportation and Circulation, page 359, change the third and fourth full sentences at the top of the page as follows:

Construction truck trips during Phase 1 and Phase 3, would arrive and depart between 7:00 A.M. and 5:00 P.M. During Phase 2, construction trips would occur between 7:00 A.M. and 5:00 P.M. from August 2nd to April 30th and between 7:00 A.M. and 7:00 P.M. from May 1st to September 1st. On Saturdays, the ~~initial~~ arrival and departure times to/from the site would ~~be approximately one hour later~~ occur between 8:00 A.M. and 5:00 P.M. during all phases throughout the year.[77]

Volume I, Section IV.J, Transportation and Circulation, page 361, change the second sentence in the second paragraph under the heading "(a) Intersections" as follows:

Based on these rates, the project would be expected to generate ~~329~~ 278 net new daily vehicle trips as shown in Table IV.J-8 on page 369.

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[76] *The grading quantities have been revised based on the development of more detailed construction plans that were not available at the time the Draft EIR was published. This change would not otherwise affect the daily schedule or overall duration of construction, as described in the Draft EIR. The construction traffic analysis presented in the Draft EIR was sufficiently conservative to accommodate the new grading quantities, and thus, there would be no change to the impact conclusions presented therein. Specifically, a conservative number of man-hours was assumed to perform the grading activities and a conservative number of truck trips was assumed to accommodate import/export. No new significant traffic impacts or substantial increase in the severity of significant impacts previously identified in the Draft EIR would occur as a result of the revised grading quantities.*

[77] *Construction trips associated with interior construction activities within fully enclosed buildings, which would be expected to be minimal, could continue until 9:00 P.M. on weekdays and 6:00 P.M. on Saturday between May 1st and September 1st during Phase 2.*

Volume I, Section IV.J, Transportation and Circulation, page 366, Table IV.J-8, make the following change under the heading "Daily": ~~329~~ 278

Volume I, Section IV.J, Transportation and Circulation, page 366, change the last two sentences in the paragraph under the heading "(b) Residential Street Segments" as follows:

Based on the thresholds provided above, impacts on the residential street segments would be less than significant on all eight residential street segments ~~with the exception of Stansbury Avenue south of Valley Vista Boulevard. As shown in this table, the project would add approximately 293 net daily trips to Stansbury Avenue south of Valley Vista Boulevard and thus, would significantly impact this residential street segment. As discussed below, a mitigation measure is proposed to reduce impacts at this street segment to a level that is less than significant~~.

Volume I, Section IV.J, Transportation and Circulation, page 370, replace Table IV.J-9 with the following table, reflecting the changes shown below:

Table IV.J-9

Residential Street Traffic Impact Analysis—Future (2014) ADT

No.	Street Segment	Without Project	Project Traffic	With Project	Percent Project Traffic
1.	Stansbury Ave. north of Valley Vista Blvd.	4,253	~~156~~ 130	~~4,409~~ 4,383	~~3.54%~~ 2.97%
2.	Stansbury Ave. south of Valley Vista Blvd.	2,506	~~293~~ 242	~~2,799~~ 2,748	~~10.47%*~~ 8.81%
3.	Valley Vista Blvd. east of Stansbury Ave.	5,301	~~66~~ 56	~~5,367~~ 5,357	~~1.23%~~ 1.05%
4.	Valley Vista Blvd. west of Stansbury Ave.	5,787	~~80~~ 64	~~5,867~~ 5,851	~~1.36%~~ 1.09%
5.	Greenleaf St. west of Stansbury Ave.	2,041	0	2,041	0%
6.	Dickens St. west of Stansbury Ave.	4,132	0	4,132	0%
7.	Camino de la Cumbre west of Stansbury Ave.	1,393	9	1,402	0.64%
8.	Camino de la Cumbre south of Valley Vista Blvd.	1,145	36	1,181	3.05%

~~* *Denotes significant project traffic impact, prior to implementation of project mitigation.*~~

Source: Crain & Associates, March 2006, as revised herein.

Volume I, Section IV.J, Transportation and Circulation, page 371, change the fourth through sixth sentences in the paragraph under the heading "(e) Access and Queuing" as follows:

The new parking facility~~, including its access connection,~~ will provide a queuing capacity for approximately ~~51~~ 40 vehicles on the lower level and approximately ~~18~~ 29 vehicles on the upper level, for a total of at least 69 vehicles.[78] Vehicles in queue for peak drop-off or pick-up activities would enter campus via Stansbury Avenue and either continue straight to enter the upper level of the parking facility or turn left to enter the lower level of the parking facility~~, where dual~~. Both levels would feature a single queuing lane~~s, would form and continue to circle up the ramp to the upper level before stopping at the northwest area of the parking facility for~~ with supervised loading/unloading activities at the head of each lane near the northern end of the parking facility. After completing the pick-up or drop-off activities, vehicles would exit the upper or lower level of the parking facility without interfering with entering vehicles on the ~~lower~~ other level.

Volume I, Section IV.J, Transportation and Circulation, page 372, replace Figure IV.J-9 with the revised Figure IV.J-9 shown on page II-53.

Volume I, Section IV.J, Transportation and Circulation, page 374, change the second sentence in the first full paragraph as follows:

Based on LAMC parking requirements (i.e., based on the largest assembly use for the facilities shared by the Middle and Upper Schools and one space per classroom for the Lower School), the project would be required to provide a total of ~~216~~ 228 parking spaces; however, since this amount is less than the existing CUP parking requirement of 230 spaces, it has not been applied as the project parking requirement.

Volume I, Section IV.J, Transportation and Circulation, page 377, change Mitigation Measure J-4 as follows:

Mitigation Measure J-4: Transportation Demand Management (TDM) Plan– Implement an enhanced TDM Plan for the School that ~~improves~~ increases the use of carpooling, public transportation, bicycling, and privately operated bus and shuttle services. ~~and bus ridership for students and achieves at least a 40 percent reduction in project daily trips (75 trips in the A.M. peak hour).~~ The ~~ultimate~~ goal of the TDM Plan ~~would~~ shall be to reduce project-related trips so that ~~there would be no increase in daily trips above that currently generated by the site~~ School-related vehicular traffic throughout the day remains at existing levels. ~~This will result in a trip ceiling of 702 trips in the A.M. peak hour. The TDM plan shall encourage the use of rideshare/carpool, public transportation and privately operated bus shuttle services.~~

[78] *The revised queuing capacity is a result of refined plans for the proposed parking facility.*

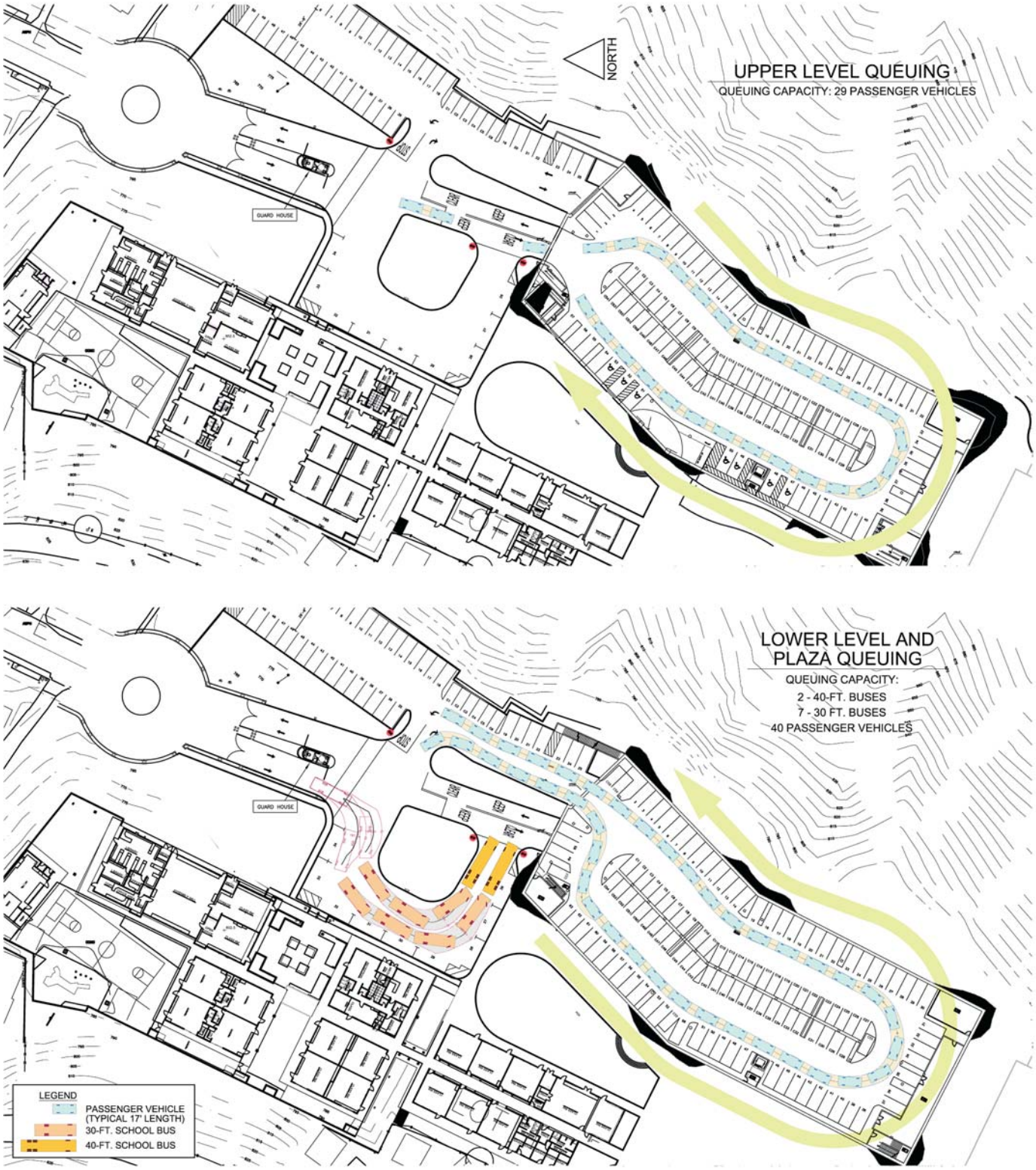

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Figure IV.J-9
Proposed Accessing and Queuing Scheme

Source: Crain & Associates, 2007

At a minimum, the TDM Plan shall reduce project-related trips during the A.M. peak hour by at least 75 trips, resulting in no increase to the existing A.M. peak-hour trip generation level, and a reduction of at least 4 project trips during the School P.M. peak hour. Additionally, although not required as mitigation, the School has volunteered to reduce project-related daily trip generation of 278 vehicle trips by at least 40 percent (i.e., a minimum of 111 trips). Aside from the required reduction of 75 trips during the A.M. peak hour and 4 trips during the School P.M. peak hour, the remaining reduction of 32 trips (i.e., 111 – 75 – 4 = 32) may be achieved during any time of the School day.

Additionally, although not required as mitigation, to further reduce impacts the Applicant also volunteers to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan. This reduction shall be applied to the existing trip generation levels of 702 trips during the A.M. peak and 443 trips during the School P.M. peak, as detailed in Appendix L (Sub-Appendix C) of the Draft EIR, thus yielding A.M. and P.M. peak generation levels of 667 trips and 421 trips, respectively.[79] This reduction shall be phased over the course of three years, beginning in the school year following project approval.

A draft of the proposed TDM Plan is provided in Appendix 3 of this Final EIR. The final TDM Plan ~~would be refined~~ shall be developed in consultation with LADOT. After initial implementation, this Plan may be refined as appropriate to achieve the required and desired trip reductions. This plan shall be resubmitted ~~to the DOT Development Review Section~~ annually at the beginning of the School year for approval ~~at the beginning of each school year~~ by LADOT, until such time that this procedure is no longer required by LADOT. ~~(Refer to Appendix L of this EIR for a draft of the proposed TDM Plan).~~

Volume I, Section IV.J, Transportation and Circulation, page 378, change Mitigation Measure J-8 as follows:

Mitigation Measure J-8: Traffic Monitoring Compliance Report - Per the LADOT approved TDM Plan, the ~~The~~ applicant shall be required to hire a licensed traffic engineer as a consultant to conduct traffic trip counts at the School ~~school~~ and submit a Compliance Report to LADOT during the fall of each year. The applicant shall be required to submit the fall Compliance Report before the end of November of each year. Such reports shall conform to requirements provided by LADOT. If the average of the trip counts indicate

[79] *These five percent peak-hour reductions total 57 trips [(702 - 667) + (443 - 421) = 57]. In combination with the required A.M. peak-hour reduction of 75 project trips and the required School P.M. peak-hour reduction of 4 project trips, this reduction would exceed the voluntary 40 percent reduction in project-related daily trip generation, while also reducing School-related vehicle trips during peak hours to less than existing levels.*

that the School exceeds its trip ceilings of 2,770 daily trips, 667 A.M. peak hour trips or 421 School P.M. peak-hour trips, which represent both mandatory and voluntary trip reductions, the School ~~If the school exceeds its trips ceiling (i.e., 702 trips in the A.M. peak hour), the school~~ shall conduct new counts and submit a spring Compliance Report before the end of April of each year. In the event that the applicant is not in compliance with the trip ceilings in the spring Compliance Report, the applicant shall be required to pay a $1,000 (one thousand dollars) penalty to the City of Los Angeles for each A.M. and School P.M. trip that the School ~~school~~ generates in excess of its trip ceilings or reduce the student enrollment for the following school year an amount equal to the number of A.M. and School P.M ~~peak hour~~ trips exceeded during the previous year. If the project trip generation proves to be in compliance with the established trip ceilings for five consecutive years the applicant shall no longer be required to submit the Compliance Reports to LADOT.

Volume I, Section IV.J, Transportation and Circulation, page 379, change the first paragraph as follows:

As shown in Table IV.J-11 ~~and Table IV.J-12~~ on page 380, implementation of the above mitigation measures would reduce operational traffic impacts at the three intersections ~~and residential street segment~~ to levels that are less than significant.

Volume I, Section IV.J, Transportation and Circulation, page 380, delete Table IV.J-12, since mitigation for the residential street segment would not be required as impacts would be less than significant.

V. Alternatives

Volume I, Section V, Alternatives, page 418, change the third sentence in the second full paragraph as follows:

On Saturday only, there would also be a similar difference, with the Alternative resulting in 32 months of significant impacts compared to ~~33~~ 34 months for the project.

Appendix D: Tree Survey

Volume II, Appendix D, Tree Survey, update the Tree Survey Report with the new report provided as Appendix 4 of this Final EIR, due to City of Los Angeles requirements that tree survey data be current as of within six months.

Appendix L: Traffic Impact Study

Volume IV, Appendix L, Traffic Impact Study, page ii, change the last sentence of the last full paragraph as follows:

It is anticipated that prior to mitigation, the project would create significant traffic impacts at the following three intersections ~~and one residential street segment location~~.

Volume IV, Appendix L, Traffic Impact Study, page iii, delete the following at the top of the page, as this impact would no longer occur:

~~Significantly Impacted Street Segment Location~~

~~2. Stansbury Avenue, south of Valley Vista Boulevard~~

Volume IV, Appendix L, Traffic Impact Study, page iii, revise the first bullet point regarding the proposed TDM Plan as follows:

- Transportation Demand Management (TDM) – Implement an enhanced TDM Plan for the School that ~~improves~~ increases the use of carpooling, public transportation, bicycling, and privately operated bus and shuttle services ~~ridership~~ for students and achieves a reduction of at least ~~a 40 percent reduction in project trips~~ 75 project trips during the A.M. peak hour, resulting in no increase to the existing A.M. peak-hour trip generation level, and a reduction of at least 4 project trips during the School P.M. peak hour. The ~~ultimate~~ goal of the TDM Plan would be to reduce project trips so there would be no increase in daily trips above that currently generated by the site. Although not required as mitigation, to further reduce impacts the Applicant also volunteers to reduce project-related daily trips by 40 percent, and to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan. Details of the preliminary TDM Plan are provided in a separate document, as amended herein. The final TDM Plan would be refined in consultation with LADOT.

Volume IV, Appendix L, Traffic Impact Study, page iv, change the "Saturday Only" impact listed under the bullet item in the middle of the page as follows:

Saturday Only: ~~33~~ 34 months (not all consecutive)

Volume IV, Appendix L, Traffic Impact Study, page 7, change the seventh sentence of the first full paragraph as follows:

Phase 3 would require a two~~-~~ and a half year construction period, beginning in May 2013.

Volume IV, Appendix L, Traffic Impact Study, page 18, revise and add to the first two sentences of the paragraph beginning at the top of the page as follows:

Automated 24-hour traffic counts were also collected on October 25, 26 and 27, 2004 at the two existing driveway locations~~,~~ on Stansbury Avenue and Camino de la Cumbre. ~~These~~ The counts on these three days ~~counts~~ included the vehicles exiting and entering the School ~~for a three-day average period~~ during normal school operating conditions. The automated 24-hour count conducted on Wednesday, October 27, 2004 at the driveway on Stansbury Avenue was excluded from the analysis, as this count experienced a mechanical error from 4:30 P.M. to 4:45 PM. Therefore, the average daily traffic volume at the driveway on Stansbury Avenue is based on a two-day average period and the average daily traffic volume at the driveway on Camino de la Cumbre is based on a three-day average period.[80]

Volume IV, Appendix L, Traffic Impact Study, page 18, revise the second to last sentence at the bottom of the page as follows:

These driveway occupancy counts were conducted ~~in~~ on Monday, October 25, 2004, from 7:00 A.M. to 9:00 A.M. during a typical School day.

Volume IV, Appendix L, Traffic Impact Study, page 28, add the following between the second and third sentences of the second paragraph under the heading "Traffic Generation":

As previously mentioned, the automated 24-hour count at the existing driveway on Stansbury Avenue experienced a mechanical error on Wednesday, October 27, 2004, from 4:30 P.M. to 4:45 P.M. Therefore, the total daily vehicle trip average is based on the sum of a two-day average of 24-hour automated counts conducted at the existing driveway on Stansbury Avenue, a three-day average of 24-hour automated counts conducted at the existing driveway on Camino de la

[80] *The 24-hour count data for the Stansbury driveway on October 25 and 26, 2004 were carefully reexamined for anomalies and none were identified. As the data for these two days were found to be reasonable and consistent, they were averaged, which is a standard procedure generally used when such data are similar.* ***This averaging procedure, as opposed to using the next highest count day (i.e., October 26, 2004), does not change impact results, but rather is more reflective of average conditions by taking more than one day of data into account.*** *For purposes of consistency, the 24-hour data for the Camino de la Cumbre driveway were also averaged. The three-day average of the October 25, 26 and 27, 2004 count data for this driveway was used as no mechanical error was discerned.*

Cumbre, and an estimate of total School-related daily vehicle trips at the off-site Sherman Oaks Fashion Square parking lot.[81] The 2,603 total daily vehicle trip average equates to a daily trip generation rate of 3.47 vehicle trips per student, once divided by the current enrollment of approximately 750 students.

Volume IV, Appendix L, Traffic Impact Study, page 29, Table 6, make the following change under the heading "Buckley School (K–12) per Student":

Daily: T = ~~4.11~~ 3.47 (S)

Volume IV, Appendix L, Traffic Impact Study, page 30, revise the first sentence at the top of the page as follows:

The School rates were applied to the proposed 80-student maximum enrollment increase and presented in Table 7 where the project would be expected to generate ~~329~~ 278 new daily vehicle trips, 75 A.M. peak-hour trips, 47 School P.M. peak-hour trips, and 25 commuter P.M. peak-hour trips.

Volume IV, Appendix L, Traffic Impact Study, page 37, revise the fourth sentence in the first full paragraph as follows:

This total on-site parking supply of 306 spaces exceeds the parking demand of 270 spaces expected during the typical school day as determined by the Parking Demand Study (Appendix A) and exceeds the City Planning and Zoning Code requirements for the School, as well as ~~including~~ concurrent assembly usage of Disney Pavilion and the new Multipurpose room.

Volume IV, Appendix L, Traffic Impact Study, page 37, revise the seventh and eighth sentences in the first full paragraph as follows:

Table 9 summarizes the project parking requirements according to the current LAMC parking regulations and indicates parking needed for concurrent assembly uses as compared to ~~and~~ the project's proposed parking supply. As the project proposes a total on-site parking supply of 306 spaces, 12 surplus parking spaces will remain on-site relative to the parking needed for two concurrent assembly uses, which is greater than the LAMC requirement. No ~~and no~~ off-site parking impacts would be expected as a result of this project.

[81] *Total daily vehicle trips at the off-site Sherman Oaks Fashion Square parking lot were estimated by multiplying the sum of the A.M., School P.M., and Commuter P.M. peak-hour manual traffic count volumes by a ratio of the daily traffic volumes at the Stansbury Avenue driveway divided by the sum of the A.M., School P.M., and Commuter P.M. peak-hour manual traffic count volumes at the Stansbury Avenue driveway.*

Volume IV, Appendix L, Traffic Impact Study, page 38, replace Table 9 with the revised table shown below:

Table 9
Project Parking Summary

Proposed Land Use	Size	Parking Ratio	Parking Spaces
Code Required Project Parking			
Field Grandstand (Largest Assembly)	1040 st	1/5 st	208
Elementary School Use	20 rm	1/1 rm	20
	Total Parking Requirement		**228**
Parking for Concurrent Assembly Uses*			
High School Use (Disney Pavilion)	6,868 sf	1/35 sf	196
Elementary School Use	20 rm	1/1 rm	20
2ne High School Assembly Space* (Multipurpose Room)	392 st	1/5 st	78
	Total Parking for Concurrent Assembly Uses, [A]		**294**
Proposed Project Parking Supply			
Parking Facility:			
Standard Spaces			117
Compact Spaces			116
Handicap Spaces			7
Surface Parking			
Standard Spaces			60
Compact Spaces			6
	Total Proposed Parking Supply, [B]		**306**
	Surplus Parking Above Concurrent Assembly Use Needs, [B – A]		**12**

* Code parking requirement for high schools is only based on the largest assembly use facility. As indicated in Table 9, even with parking for two assembly use facilities, there would be more than adequate parking provided on site.

Volume IV, Appendix L, Traffic Impact Study, page 39, revise the third sentence in the first paragraph under the heading "Vehicle Queuing" as follows:

The new parking facility~~, including its access connection,~~ will be able to provide queuing for approximately ~~51~~ 40 vehicles on the lower level and approximately ~~18~~ 29 vehicles on the upper level, for a total of at least 69 vehicles.

Volume IV, Appendix L, Traffic Impact Study, pages 64 and 65, revise the last paragraph at the bottom of page 64 (and continuing onto page 65), beginning with the sixth sentence, as follows:

It is estimated that the project would add approximately ~~293~~ 242 trips per day to Stansbury Avenue south of Valley Vista Boulevard since this directly accesses the School's main entrance. Table 14 shows that according to the above criteria, the project would not ~~result in one~~ significantly impact~~ed~~ any of the eight residential street segments ~~location at Stansbury Avenue south of Valley Vista Boulevard~~. The School ~~would~~ will implement an enhanced Transportation Demand Management (TDM) Plan to reduce daily project traffic on the surrounding residential street segments, including on Stansbury Avenue south of Valley Vista Boulevard. The TDM Plan is ~~mitigate this impact to a level of insignificance as~~ addressed in the Mitigation Measures section of this report.

Volume IV, Appendix L, Traffic Impact Study, page 68, revise the first bullet point regarding the proposed TDM Plan as follows:

- Transportation Demand Management (TDM) – Implement an enhanced TDM Plan for the School that ~~improves~~ increases the use of carpooling, public transportation, bicycling, and privately operated bus and shuttle services ~~ridership~~ for students and achieves a reduction of at least ~~a 40 percent reduction in project trips~~ 75 project trips during the A.M. peak hour, resulting in no increase to the existing A.M. peak-hour trip generation level, and a reduction of at least 4 project trips during the School P.M. peak hour. The ~~ultimate~~ goal of the TDM Plan would be to reduce project trips so there would be no increase in daily trips above that currently generated by the site. Although not required as mitigation, to further reduce impacts the Applicant also volunteers to reduce project-related daily trips by 40 percent, and to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan. Details of the preliminary TDM Plan are provided in a separate document, as amended herein. The final TDM Plan would be refined in consultation with LADOT.

Volume IV, Appendix L, Traffic Impact Study, page 68, revise the last paragraph as follows:

With implementation of the above measures, project traffic impacts would be reduced to less than significant levels, as shown in Table 15(a) for the intersection impacts ~~and Table 15(b) for the residential street impact~~.

Volume IV, Appendix L, Traffic Impact Study, page 69, delete Table 15(b), since mitigation for the residential street segment would not be required as impacts would be less than significant.

Volume IV, Appendix L, Traffic Impact Study, page 70, change the third sentence in the first paragraph, and add the new sentences that follow:

The proposed construction work days and hours are expected to be Monday through Friday, 7:00 A.M. to 5:00 P.M. each day during Phase 1, Phase 3, and most of Phase 2, except for management, supervisory, administrative, and inspection activities which may occur at other times, and when extended hours are required and specifically permitted by the City. During Phase 2, construction days and hours would be Monday through Friday, 7:00 A.M. to 5:00 P.M. each day from September 2nd to April 30th; Monday through Friday, 7:00 A.M. to 7:00 P.M. from May 1st to September 1st; and Saturday, 8:00 A.M. to 5:00 P.M. throughout the year. Once a building is fully enclosed, interior construction activities occurring during Phase 2 between May 1st and September 1st may continue until 9:00 P.M. on weekdays and 6:00 P.M. on Saturday.

Volume IV, Appendix L, Traffic Impact Study, page 71, change the fifth and sixth sentences in the second paragraph, and add the new sentence that follows:

Construction truck trips during Phase 1 and Phase 3 are estimated to arrive and depart between 7:00 A.M. and 5:00 PM. During Phase 2, construction trips would occur between 7:00 A.M. and 5:00 P.M. from September 2nd to April 30th and between 7:00 A.M. and 7:00 P.M. from May 1st to September 1st. On Saturday, the ~~initial~~ arrival and departure times to/from the site would ~~be approximately one hour later~~ occur between 8:00 A.M. and 5:00 P.M. during all phases throughout the year. Construction trips associated with interior construction activities within fully enclosed buildings, which would be expected to be minimal, could continue until 9:00 P.M. on weekdays and 6:00 P.M. on Saturday between May 1st and September 1st of Phase 2.

Volume IV, Appendix L, Traffic Impact Study, pages 81 through 83, replace Table 18 with the revised Table 18, provided on pages II-62 through II-65.

Table 18
Estimated Project Construction Traffic

Approximate Month & Phase	Daily	6-7 AM		7-8 AM		8-9 AM		3-4 PM		4-5 PM		5-6 PM	
		I/B	O/B	I/B	O/B	I/B	O/B	I/B	O/B	I/B	O/B	I/B	O/B
1. May 2009 Phase 1	140	10	0	7	2	9	4	0	12	0	3	0	0
2. June 2009 Phase 1	144	10	0	8	2	9	5	0	13	0	3	0	0
3. July 2009 Phase 1	166	12	0	10	2	10	7	0	15	0	4	0	0
4. August 2009 Phase 1	98	14	0	5	1	4	2	0	11	0	4	0	1
5. September 2009 Phase 1	112	13	0	7	0	6	4	0	12	0	4	0	1
6. October 2009 Phase 1	98	13	0	6	0	4	3	0	11	0	4	0	1
7. November 2009 Phase 1	104	16	0	6	0	4	3	0	13	0	5	0	1
8. December 2009 Phase 1	108	16	0	7	0	4	3	0	15	0	5	0	1
9. January 2010 Phase 1	90	16	0	5	0	3	2	0	13	0	5	0	1
10. February 2010 Phase 1	100	20	0	6	0	3	2	0	17	0	6	0	1
11. March 2010 Phase 1	128	20	0	8	0	5	4	0	19	0	6	0	1
12. April 2010 Phase 1	122	15	0	8	1	6	4	0	14	0	5	0	1
13. May 2010 Phase 2	210	24	0	12	2	11	7	3	5	2	2	2	3
14. June 2010 Phase 2	284	28	0	17	4	16	10	4	6	4	4	4	5
15. July 2010 Phase 2	336	28	0	19	7	21	12	7	8	4	7	4	5
16. August 2010 Phase 2	228	33	0	14	3	10	6	4	5	2	4	2	3
17. September 2010 Phase 2	342	33	0	19	6	19	12	1	37	0	12	0	1
18. October 2010 Phase 2	214	30	0	14	2	9	6	1	29	0	11	0	1
19. November 2010 Phase 2	236	28	0	14	4	12	7	1	29	0	10	0	1
20. December 2010 Phase 2	230	28	0	14	4	11	7	1	29	0	10	0	1
21. January 2011 Phase 2	172	28	0	11	2	6	4	1	26	0	10	0	1
22. February 2011 Phase 2	196	38	0	12	2	9	5	1	33	0	12	0	1
23. March 2011 Phase 2	154	37	0	10	0	4	2	0	29	0	12	0	1
24. April 2011 Phase 2	186	42	0	12	1	7	4	1	35	0	14	0	1
25. May 2011 Phase 2	184	42	0	12	1	7	4	1	3	0	0	0	1

Table 18 (cont.)
Estimated Project Construction Traffic

Approximate Month & Phase	Daily	6-7 AM		7-8 AM		8-9 AM		3-4 PM		4-5 PM		5-6 PM	
		I/B	O/B	I/B	O/B	I/B	O/B	I/B	O/B	I/B	O/B	I/B	O/B
26. June 2011 Phase 2	216	47	0	14	2	7	4	1	4	0	1	0	1
27. July 2011 Phase 2	212	47	0	14	2	6	4	1	4	0	1	0	1
28. August 2011 Phase 2	206	47	0	14	1	5	4	1	4	0	1	0	1
29. September 2011 Phase 2	190	44	0	13	0	6	5	1	38	0	14	0	1
30. October 2011 Phase 2	152	38	0	9	0	3	3	1	32	0	12	0	1
31. November 2011	0	0	0	0	0	0	0	0	0	0	0	0	0
32. December 2011	0	0	0	0	0	0	0	0	0	0	0	0	0
33. January 2012	0	0	0	0	0	0	0	0	0	0	0	0	0
34. February 2012	0	0	0	0	0	0	0	0	0	0	0	0	0
35. March 2012	0	0	0	0	0	0	0	0	0	0	0	0	0
36. April 2012	0	0	0	0	0	0	0	0	0	0	0	0	0
37. May 2012	0	0	0	0	0	0	0	0	0	0	0	0	0
38. June 2012	0	0	0	0	0	0	0	0	0	0	0	0	0
39. July 2012	0	0	0	0	0	0	0	0	0	0	0	0	0
40. August 2012	0	0	0	0	0	0	0	0	0	0	0	0	0
41. September 2012	0	0	0	0	0	0	0	0	0	0	0	0	0
42. October 2012	0	0	0	0	0	0	0	0	0	0	0	0	0
43. November 2012	0	0	0	0	0	0	0	0	0	0	0	0	0
44. December 2012	0	0	0	0	0	0	0	0	0	0	0	0	0
45. January 2013	0	0	0	0	0	0	0	0	0	0	0	0	0
46. February 2013	0	0	0	0	0	0	0	0	0	0	0	0	0
47. March 2013	0	0	0	0	0	0	0	0	0	0	0	0	0
48. April 2013	0	0	0	0	0	0	0	0	0	0	0	0	0
49. May 2013 Phase 3A	142	10	0	7	3	9	4	0	12	0	3	0	0
50. June 2013 Phase 3A	124	12	0	7	1	7	4	0	13	0	4	0	0

Table 18 (cont.)
Estimated Project Construction Traffic

Approximate Month & Phase	Daily	6-7 AM		7-8 AM		8-9 AM		3-4 PM		4-5 PM		5-6 PM	
		I/B	O/B	I/B	O/B	I/B	O/B	I/B	O/B	I/B	O/B	I/B	O/B
51. July 2013 Phase 3A	166	12	0	10	2	10	7	0	15	0	4	0	0
52. August 2013 Phase 3A	102	16	0	5	1	4	2	0	12	0	5	0	1
53. September 2013 Phase 3A	108	13	0	7	0	5	4	0	12	0	4	0	1
54. October 2013 Phase 3A	98	13	0	6	0	4	3	0	11	0	4	0	1
55. November 2013 Phase 3A	98	13	0	6	0	4	3	0	11	0	4	0	1
56. December 2013 Phase 3A	106	16	0	6	0	4	3	0	13	0	5	0	1
57. January 2014 Phase 3A	90	16	0	5	0	3	2	0	12	0	5	0	1
58. February 2014 Phase 3A	88	16	0	5	0	3	2	0	12	0	5	0	1
59. March 2014 Phase 3A	118	16	0	7	0	5	4	0	14	0	5	0	1
60. April 2014 Phase 3A	122	15	0	8	1	6	4	0	14	0	5	0	1
61. May 2014 Phase 3B, 3C-Aqu, 3D	334	33	0	17	5	16	9	0	34	0	10	0	0
62. June 2014 Phase 3B, 3C-Aqu, 3D	374	50	0	21	4	17	10	0	49	0	16	0	0
63. July 2014 Phase 3B, 3C-Aqu, 3D	416	48	0	25	4	19	14	0	49	0	16	0	0
64. August 2014 Phase 3B, 3C-Aqu, 3D	328	55	0	18	3	12	7	0	46	0	17	0	2
65. September 2014 Phase 3B, 3C-Aqu, 3D	282	35	0	17	0	12	9	0	31	0	11	0	2
66. October 2014 Phase 3B, 3C-Aqu	192	28	0	12	0	7	5	0	23	0	9	0	2
67. November 2014 Phase 3B, 3C-Aqu	226	32	0	13	1	10	7	0	27	0	10	0	2
68. December 2014 Phase 3B, 3C-Aqu	190	32	0	10	0	6	4	0	24	0	10	0	2
69. January 2015 Phase 3B, 3C-Aqu	206	32	0	11	1	7	5	0	26	0	10	0	2
70. February 2015 Phase 3B, 3C-Aqu	186	32	0	10	0	6	4	0	24	0	10	0	2

Table 18 (cont.)
Estimated Project Construction Traffic

Approximate Month & Phase	Daily	6-7 AM		7-8 AM		8-9 AM		3-4 PM		4-5 PM		5-6 PM	
		I/B	O/B	I/B	O/B	I/B	O/B	I/B	O/B	I/B	O/B	I/B	O/B
71. March 2015 Phase 3B, 3C-Aqu, 3C-Dis	266	35	0	15	1	10	6	0	31	0	10	0	2
72. April 2015 Phase 3B, 3C-Dis	260	39	0	15	3	12	7	0	36	0	12	0	1
73. May 2015 Phase 3C-Dis	162	18	0	10	2	8	6	0	19	0	6	0	0
74. June 2015 Phase 3C-Dis	132	20	0	8	1	5	4	0	18	0	6	0	1
75. July 2015 Phase 3C-Dis	112	19	0	7	0	4	3	0	16	0	6	0	1
76. August 2015 Phase 3C-Dis	106	20	0	6	0	3	2	0	16	0	6	0	1
77. September 2015 Phase 3C-Dis	122	20	0	7	1	5	3	0	17	0	6	0	1
78. October 2015 Phase 3C-Dis	84	15	0	5	0	2	1	0	11	0	5	0	1
79. November 2015 Phase 3C-Dis	112	16	0	6	1	5	3	0	13	0	5	0	1
80. December 2015 Phase 3C-Dis	84	15	0	5	0	2	1	0	11	0	5	0	1

Volume IV, Appendix L, Traffic Impact Study, page 87, change the "Saturday Only" impact listed under the bullet item near the top of the page as follows:

Saturday Only: ~~33~~ 34 months: May – July 2009 & March – April 2010, Ph. 1; May ~~–~~ ~~June~~ 2010, August 2010, October 2010 – October 2011, Ph. 2; May – July 2013 & April 2014, Ph. 3A; ~~September 2014, Ph. 3B, 3C & 3D;~~ October 2014 – June 2015, Ph. 3B & 3C; September 2015, Ph. 3C.

Volume IV, Appendix L, Traffic Impact Study, page C-1, replace Appendix C (only that portion of the table on page C-1) with the following, reflecting the change shown below:

APPENDIX C
Site Specific Project Trip Generation Rates

Time Period	Observed Location	Inbound Vehicles	Outbound Vehicles	Total Vehicle Trips	Existing Enrollment	Derived Rate
Daily	Stansbury Avenue Driveway	---	---	~~2,767~~ 2,363		
	Camino de la Cumbre Driveway	---	---	~~175~~ 121		
	Off-Site Fashion Square Lot	---	---	~~140~~ 119		
				~~3,082~~ 2,603	750 students =	~~**4.11**~~ **3.47**
AM Peak Hour (7:45-8:45)	Stansbury Avenue Driveway	380	306	686		
	Camino de la Cumbre Driveway	0	0	0		
	Off-Site Fashion Square Lot	13	3	16		
		393	309	702	750 students =	**0.94**
School PM Peak Hour (3:00-4:00)	Stansbury Avenue Driveway	197	213	410		
	Camino de la Cumbre Driveway	0	0	0		
	Off-Site Fashion Square Lot	9	24	33		
		206	237	443	750 students =	**0.59**
Commuter PM Peak Hour (4:15-5:15)	Stansbury Avenue Driveway	76	137	213		
	Camino de la Cumbre Driveway	0	0	0		
	Off-Site Fashion Square Lot	6	11	17		
		82	148	230	750 students =	**0.31**

LAFD Access Plan & Approval

Add Appendix 5, LAFD Access Plan & Approval, of this Final EIR to the record.

III. Responses to Comment Letters

III. RESPONSES TO COMMENTS

Letter No.	SUMMARY OF WRITTEN COMMENTS	Aesthetics	Air Quality	-- Health Risk	Alternatives	Biological Resources	CEQA	Construction	Cultural Resources	Cumulative Impacts	CUP Conditions	-- Special Events	Fire Protection	General Opposition	General Support	Geology	Hazards and Hazardous Materials	Hydrology	Land Use	Noise	Other Environmental Considerations	Project Description	Property Values	Quality of Life	Transportation and Circulation	-- Emergency Access	-- TDM	Water	Other
	STATE AGENCIES																												
1	Terry Roberts, Director State Clearinghouse and Planning Unit 1400 Tenth Street P.O. Bo□ 3044 Sacramento, California 95812-3044						✓																						
2	Dave Singleton, Program Analyst Native American Heritage Commission 915 Capitol Mall, Room 364 Sacramento, CA 95814																												✓
3	Dave Singleton, Program Analyst Native American Heritage Commission 915 Capitol Mall, Room 364 Sacramento, CA 95814						✓		✓																				
	CITY AGENCIES																												
4	Luis Nuno, Engineer of East Valley District Water Distribution Engineering Los Angeles Department of Water and Power 111 North Hope Street, Room 1044 Los Angeles, CA 90012																										✓	✓
	HOMEOWNERS ASSOCIATIONS																												
5	Vivian Gumbiner, Chair Ellen Vukovich, Member, Board of Directors Sherman Oaks Homeowners Association Post Office Bo□ 5223 Sherman Oaks, CA 91413	✓	✓					✓		✓										✓		✓			✓				✓
	RESIDENTS & OTHER ORGANIZATIONS																												
6	Wil Von Der Ahe 14140 Investments, Inc. VDA Management Services 16217 Kittridge Street Van Nuys, California 91406														✓														

Letter No.	SUMMARY OF WRITTEN COMMENTS	Aesthetics	Air Quality	-- Health Risk	Alternatives	Biological Resources	CEQA	Construction	Cultural Resources	Cumulative Impacts	CUP Conditions	-- Special Events	Fire Protection	General Opposition	General Support	Geology	Hazards and Hazardous Materials	Hydrology	Land Use	Noise	Other Environmental Considerations	Project Description	Property Values	Quality of Life	Transportation and Circulation	-- Emergency Access	-- TDM	Water	Other
7	Madeline Bailey 13914 Valley Vista Boulevard Sherman Oaks, CA 91423 (Includes two email/written correspondences)	✓						✓			✓	✓		✓					✓	✓				✓	✓	✓			
8	Kenneth R. Ballard, Esq. 14090 Roblar Road Sherman Oaks, CA 91423																												
9	Jennifer Berman 4184 Stansbury Avenue Sherman Oaks, CA 91423 jenniferberman@xlxrx.com													✓											✓				
10	Geoff Case 3852 Camino de Solana Sherman Oaks, CA 91423							✓			✓			✓					✓	✓									✓
11	Barbara Case bdourmash@aol.com													✓															
12	Barbara Case & Geoffrey Case Concerned Neighbors of Buckley Sherman Oaks Homeowners Association Buckley School Executive Committee (Sent as an Attachment to Letter No. 11)	✓	✓		✓	✓	✓	✓	✓	✓	✓			✓		✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓			
13	Jack and Carolyn Cowles jackncarolyn@adelphia.net										✓														✓				
14	Kathi and Tom Flood 3968 Camino de la Cumbre kathi@kathiflood.com		✓										✓	✓						✓	✓			✓		✓			

Letter No.	SUMMARY OF WRITTEN COMMENTS	Aesthetics	Air Quality	-- Health Risk	Alternatives	Biological Resources	CEQA	Construction	Cultural Resources	Cumulative Impacts	CUP Conditions	-- Special Events	Fire Protection	General Opposition	General Support	Geology	Hazards and Hazardous Materials	Hydrology	Land Use	Noise	Other Environmental Considerations	Project Description	Property Values	Quality of Life	Transportation and Circulation	-- Emergency Access	-- TDM	Water	Other
15	Robert M. and Isabelle Fox 3929 Stansbury Avenue Sherman Oaks, CA 91423									✓	✓			✓					✓						✓	✓			✓
16	Ellen Tutsch-Gregos 4865 Winnetka Ave. Woodland Hills, CA 91364														✓														
17	Peter & Frances Hovenier 3460 Camino de la Cumbre Sherman Oaks, CA 91423														✓														
18	Joe Howard 13160 Valley Vista Boulevard Sherman Oaks, CA 91423 alamohoward@yahoo.com														✓														
19	Martin R. Irani 16266 Dorilee Lane Encino, CA 91436														✓														
20	Elliot Klein Hupp31@aol.com	✓			✓			✓						✓						✓									
21	Craig Knizek 4050 Stansbury Avenue Sherman Oaks							✓			✓	✓		✓											✓		✓		
22	Kathleen Laccinole 4041 Stansbury Avenue Sherman Oaks, CA 91423													✓															
23	Kathleen Laccinole 4041 Stansbury Avenue Sherman Oaks, CA 91423 (Sent as an Attachment to Letter No. 22)				✓																		✓		✓				✓

Letter No.	SUMMARY OF WRITTEN COMMENTS	Aesthetics	Air Quality	-- Health Risk	Alternatives	Biological Resources	CEQA	Construction	Cultural Resources	Cumulative Impacts	CUP Conditions	-- Special Events	Fire Protection	General Opposition	General Support	Geology	Hazards and Hazardous Materials	Hydrology	Land Use	Noise	Other Environmental Considerations	Project Description	Property Values	Quality of Life	Transportation and Circulation	-- Emergency Access	-- TDM	Water	Other
24	Paul Layton paul@tssla.com										✓			✓															
25	Henry Lipson 4112 Stansbury Ave. Sherman Oaks, CA 91423		✓	✓	✓																								
26	Maria Pavlou 4737 Burnet Ave. Sherman Oaks, CA 91403														✓										✓	✓			✓
27	Charles Perez, Owner Paul Davril, Inc. 5401 S. Soto Street Los Angeles, CA 90058														✓														
28	Paul Roman 4230 Stansbury Avenue #304 Sherman Oaks, CA 91423														✓														
29	The Randy Simon Family SIMONRANDY@aol.com				✓			✓			✓								✓	✓					✓				✓
30	Laurel Baker Tew, Director of Admission and Chad Tew Viewpoint School 23620 Mulholland Highway Calabasas, California 91302														✓														
31	Philip & Alyce de Toledo 3611 Longridge Avenue Sherman Oaks, California 91423														✓														

Letter No.	SUMMARY OF WRITTEN COMMENTS	Aesthetics	Air Quality	-- Health Risk	Alternatives	Biological Resources	CEQA	Construction	Cultural Resources	Cumulative Impacts	CUP Conditions	-- Special Events	Fire Protection	General Opposition	General Support	Geology	Hazards and Hazardous Materials	Hydrology	Land Use	Noise	Other Environmental Considerations	Project Description	Property Values	Quality of Life	Transportation and Circulation	-- Emergency Access	-- TDM	Water	Other
32	Cathy Walsh 14473 Glorietta Dr. Sherman Oaks, CA 91423 ctfunw@aol.com				✓			✓						✓										✓	✓	✓			✓
33	Dennis Weiss 13866 Valley Vista Blvd. Sherman Oaks, CA 91423														✓														
34	Steve and Kelly Weiss 4055 Stansbury Avenue Sherman Oaks, CA 91423	✓						✓			✓								✓						✓				
35	Mark Wolfson Reel Entertainment, LLC 11684 Ventura Blvd., Suite 134 Studio City, CA 91604														✓														
36	Peter Wright Sherman Oaks pkwright@pkwright.com														✓														
37	Arlene Wszalek 15649 Woodfield Place Sherman Oaks, CA 91403														✓														
38	John T. Wulfmeyer, A.I.A. John Wulfmeyer Architect 3920 Stansbury Ave Sherman Oaks, CA 91423		✓					✓			✓														✓		✓		✓

LETTER NO. 1

Terry Roberts, Director
State Clearinghouse and Planning Unit
1400 Tenth Street
P.O. Box 3044
Sacramento, California 95812-3044

COMMENT NO. 1-1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 18, 2006, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

RESPONSE NO. 1-1

This comment acknowledges receipt of the Draft EIR by the State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, and review of the Draft EIR by those State agencies with jurisdiction over the project, in accordance with CEQA. Attached to this letter is a letter from the State Native American Heritage Commission, which is presented as Comment Letter 2 of this Final EIR.

COMMENT NO. 1-2

***SCH#* 2005011055**

Project Title The Buckley School Campus Enhancement Plan

Lead Agency Los Angeles City Planning Department

Type EIR Draft EIR

Description The proposed Buckley School Campus Enhancement Plan is intended to address the needs of existing and future school programs, including the provision of adequate teaching space for all educational levels, specialty teaching spaces, and multipurpose spaces for educational gatherings that cannot occur in a standard classroom. The project also provides for the modernization of existing facilities, improved disabled access, and energy efficiency upgrades. Included within the Campus Enhancement Plan are vehicular circulations and queuing improvements. increased parking within a new enclosed parking facility, the demolition of six buildings, construction of five new/replacement buildings. a central plant. and addition to and/or renovation of several existing buildings.

Lead Agency Contact

Name Jimmy C. Liao

Agency Los Angeles City Planning Department

Phone (213) 978-1331 ***Fax***

email

Address 200 No. Spring Street. Room 750

City Los Angeles ***State*** CA ***Zip*** 90012

Project Location

County Los Angeles

City Los Angeles, City of

Region

Cross Streets Ventura Boulevard and Beverly Glen Boulevard

Parcel No.

Township ***Range*** ***Section*** ***Base***

Proximity to:

Highways 101

Airports

Railways

Waterways

Schools

Land Use Educational Facility/ RE-40-1 -H / Minimum Density Residential and Very Low Density Residential

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Cumulative Effects; Drainage/Absorption; Geologic/Seismic; Landuse; Noise; Soil Erosion/Compaction/Grading; Toxic/Hazardous: Traffic/Circulation; Water Quality; Wetland/Riparian; Wildlife

Reviewing Resources Agency; Regional Water Quality Control Board, Region 4; Department

Agencies of Parks and Recreation: Native American Heritage Commission; Integrated Waste Management Board; Office of Historic Preservation; Department of Health Services; Department of Fish and Game, Region 5; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Department of Toxic Substances Control

Date Received 11/02/2006 ***Start of Review*** 11/02/2006 ***End of Review*** 12/18/2006

RESPONSE NO. 1-2

This comment acknowledges receipt and review of the Draft EIR and provides a brief description of the project.

LETTER NO. 2

Dave Singleton
Program Analyst
Native American Heritage Commission
915 Capitol Mall, Room 364
Sacramento, CA 95814

COMMENT NO. 2-1

The Native American Heritage Commission has examined the Draft Environmental Impact Report on the above-referenced project. It has no comments in addition to those presented to you in our letter of February 8, 2005 after the review by Rob Wood of the NAHC staff, attached.

Thank you for the opportunity to review the document again. If you have any questions, please do not hesitate to contact me.

RESPONSE NO. 2-1

This comment acknowledges NAHC review of the Draft EIR, which was provided in accordance with CEQA requirements.

LETTER NO. 3

Dave Singleton
Program Analyst
Native American Heritage Commission
915 Capitol Mall, Room 364
Sacramento, CA 95814

COMMENT NO. 3-1

I know in a previous letter we stated that we had no further comments on this project; however, we will take the opportunity to comment on the above-referenced document. The Native American Heritage Commission is the state's Trustee Agency for Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect.

RESPONSE NO. 3-1

This comment explains the Native American Heritage Commission's jurisdiction to review and comment on the Draft EIR in accordance with CEQA. As required by CEQA Guidelines §15064.5 (b)(c), a Draft EIR for the Buckley School Campus Enhancement Plan was prepared and included an assessment of potential adverse effects on historical and archaeological resources within the "Area of Potential Effect" (APE). A detailed discussion is included in Section IV.D, Cultural Resources, of the Draft EIR. Where applicable, mitigation measures have been included to mitigate the potential affects on the APE from the proposed project.

COMMENT NO. 3-2

To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

✓ Contact the appropriate California Historic Resources Information Center (CHRIS). The record search will determine:

- If a part or the entire APE has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present

RESPONSE NO. 3-2

A cultural resource records search was conducted for the project through the California Historic Resources Information System South Central Coastal Information Center at California State University, Fullerton, in September 2003. Results of the record search indicate that no archaeological sites have been recorded within the project site or a within a half-mile radius of the project site. Prior to development of the site as the Buckley School, the site hosted the Glen Aire County Club, which included a golf course. Development of the golf course included extensive grading and addition of fill. Because of this history of development and soil movement, the remaining archaeological sensitivity of the project site is evaluated as low.

COMMENT NO. 3-3

✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- The final report containing site forms, site significance, and mitigation measurers [sic] should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure.

- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

RESPONSE NO. 3-3

The surface of the areas proposed for development has already been disturbed. As no previously undisturbed ground surface will be disturbed by the footprint of the proposed project, a surface inventory was not warranted for this project.

COMMENT NO. 3-4

✓ Contact the Native American Heritage Commission (NAHC) for:

* A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity who may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: USGS 7.5-minute quadrangle citation with name, township, range and section;

- The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact, particularly the contacts of the on the [sic] list.

RESPONSE NO. 3-4

A Sacred Lands file search was conducted for the project through the Native American Heritage Commission (NAHC) on April 26, 2005. As per recommended NAHC procedure, follow-up letters were sent to all Native American individuals and groups identified by the NAHC as having an affiliation with the project vicinity. The letters requested that contacted individuals or groups share any information they might have about Native American cultural resources that might be affected by the proposed project. To date, no additional Native American concerns regarding the proposed project have been received.

COMMENT NO. 3-5

✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.

- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

RESPONSE NO. 3-5

The project site has been developed since before the 1960s. Development has included leveling and filling for the Glen Aire Country Club golf course that occupied the project site prior to its development. The record search results do not indicate any known archaeological sites within the project site or within a half mile radius. For this reason, the archaeological sensitivity of the project site is estimated to be low, and monitoring of ground-disturbing activities is not recommended. In addition, as discussed in the Initial Study appended to the Draft EIR, any accidental discovery of archaeological resources would result in a ceasing of work in the area and deposits would be treated in accordance with Federal, State, and local guidelines including those set forth in California Public Resources Code Section 21083.2.

COMMENT NO. 3-6

✓ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

* CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

RESPONSE NO. 3-6

The results of the project-specific cultural resource record search and Native American Sacred Lands file search did not indicate any sensitivity for Native American human remains within the project site. Furthermore, if such resources are unexpectedly encountered during construction excavation and/or grading activities, all work shall cease in that area. Any accidental discovery of human remains will be treated in accordance with Section 5097.98 of the Public Resources Code (PRC) and Section 7050.5 of the Health and Safety Code. Implementation of these regulatory requirements would ensure that potential impacts associated with the disturbance of human remains would be less than significant.

COMMENT NO. 3-7

✓ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

RESPONSE NO. 3-7

As indicated in Response to Comment No. 3-6, above, any accidental discovery of human remains will be treated in accordance with Section 5097.98 of the Public Resources Code (PRC) and Section 7050.5 of the Health and Safety Code.

COMMENT NO. 3-8

✓ Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

Please feel free to contact me at (916) 653-6251 if you have any questions.

RESPONSE NO. 3-8

As discussed in the Initial Study, there are no known cultural resources within the project vicinity that have been discovered during the course of project planning. Thus, avoidance of cultural resources as part of the planning process is not necessary. As indicated above, should archaeological resources or human remains be discovered during project construction, regulatory requirements regarding accidental discovery would be implemented.

COMMENT NO. 3-9

Native American Contacts
Los Angeles County
November 8, 2006

Fernandeno Tataviam Band of Mission Indians
Randy Guzman-Folkes,
Dir. Cultural and Environmental Department
601 South Brand Boulevard, Suite 102 — Fernandeno
San Fernando, CA 91340 — Tataviam
ced@tataviam.org
(818) 837-0794 Office
(818) 581-9294 Cell
(818) 837-0796 Fax

LA City/County Native American Indian Comm
Ron Andrade,
Director
3175 West 6th Street, Rm. 403
Los Angeles, CA 90020

(213) 351-5324

(213) 386-3995 FAX

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Adminstrator
4712 Admiralty Way, Suite 172 — Gabrielino Tongva
Marina Del Rey, CA 90292

310-570-6567

San Fernando Band of Mission Indians
John Valenzuela, Chairperson
P.O. Box 221838 — Fernandeno
Newhall, CA 91322 — Tataviam
tsen2u@msn.com — Serrano
(661) 753-9833 Office — Vanyume
(760) 949-1604 Fax — Kitanemuk

Gabrieleno/Tongva Tribal Council
Anthony Morales, Chairperson
PO Box 693 — Gabrielino Tongva
San Gabriel, CA 91778
(626) 286-1632
(626) 286-1758 – Home
(626) 286-1262 Fax

Richard Angulo
1222 Potter Avenue — Chumash
Thousand Oaks, CA 91360
(805) 493-2863 (Work)

(805) 493-2163 Fax

Gabrielino Tongva Indians of California Tribal Council
Mercedes Dorame, Tribal Administrator
20990 Las Flores Mesa Drive — Gabrielino Tongva
Malibu, CA 90265
Pluto05@hotmail.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibilitiey [sic] as defined in Sec. 7050,5 of the Health & Safety Code, Sec. 5097.94 of the Public Resources Code and Sec. 5097.98 of the Publi [sic] Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2005011055; CEQA Notice of Completion; draft Environmental Impact Report (EIR); Spicifc [sic] Plan Exception for Buckly [sic] School Campus Enhancement Plan; City Planning Department; City of Los Angeles; Los Angeles County, California.

RESPONSE NO. 3-9

Contact letters were sent to all Native American groups and individuals identified by the Native American Heritage Commission (NAHC) as having affiliation with the project vicinity in the NAHC Sacred Lands file results letter of April 26, 2005. The letters included a brief project description, location, and requested that contacted individuals or groups share any information they might have about Native American cultural resources that might be affected by the proposed project. To date, no additional Native American concerns regarding the proposed project have been received.

LETTER NO. 4

Luis Nuno
Engineer of East Valley District Water Distribution Engineering
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

COMMENT NO. 4-1

The Los Angeles Department of Water and Power (LADWP) is hereby providing comments to the above-referenced Draft EIR, as requested in your letter dated November 2, 2006.

We are providing information for consideration and incorporation into the planning, design, and development efforts for the proposed project. Regarding water needs for the proposed project, this letter does not constitute a response to a water supply assessment due to recent state legislative activity (i.e., SB 901, SB 610, and SB 221) for development projects to determine the availability of long-term water supply. Our understanding is that a water supply assessment by the water supply agency needs to be requested and completed prior to issuing a draft Negative Declaration of [sic] draft EIR.

Before investing resources in preparation of a water supply assessment, we recommend that you contact LADWP, Mr. Alvin Bautista, (213) 367-0800 or by e-mail at alvin.bautista@water.ladwp.com, and provide specific project details as requested to help staff make a determination on whether or not the proposed project meets the criteria for compliance with this legislation.

If proposed project parameters (e.g., development details such as type, square footage, anticipated water demand by 2020, population increase, etc.) are such that they are subject to state law requiring a water availability assessment, a separate request must be made in writing to:

Mr. James B. McDaniel
Chief Operating Officer - Water System
Los Angeles Department of Water and Power
111 North Hope Street, Room 1455
Los Angeles, CA 90012

RESPONSE NO. 4-1

As indicated in the January 2006 Initial Study for the Buckley School Campus Enhancement Plan (provided as Appendix B of the Draft EIR), the project falls below any of the

thresholds contained in the recently enacted water supply legislation (specifically SB 610 and SB 221). Therefore, requirements relating to completion of a formal water supply assessment would not be triggered. LADWP's most recent Urban Water Management Plan indicates that a sufficient water supply is expected to be available to serve projects such as that proposed. In addition, since the population of the project falls within the population projections for the Sherman Oaks-Studio City-Toluca Lake - Cahuenga Pass Community Plan area, project-related water consumption would not adversely affect regional water supplies which are considered to be adequate through the year 2010.[82]

COMMENT NO. 4-2

The following are our preliminary comments on the proposed project.

Water Needs

The Los Angeles Department of Water and Power (LADWP) owns, maintains, and operates an 8-inch water main in Camino De La Cumbre, an 8-inch/6-inch water main in Stansbury Avenue, and an 8-inch water main in an easement within the Buckley School Campus. There are several water services and public fire hydrants serving the Buckley School from aforementioned water mains.

The Water Distribution System can adequately supply water for domestic use. Available fire flow for private on-site fire protection can be determined by filing a Service Advisory Request(s) from our New Business Office at (213) 367-2130. Public fire hydrant requirements, including fire flow, are set by the Los Angeles Fire Department (LAFD). Public fire flow can be analyzed at the request of the LAFD.

As the project proceeds further in the design phase, we recommend the project applicant or designated Project Management Engineer contact Mr Hugo Torres at (213) 367-1178 or by email at hugo.torres@water.ladwp.com to make arrangements for water supply service needs.

RESPONSE NO. 4-2

This comment indicates that the water distribution system can adequately supply water for domestic use, consistent with the findings of the Initial Study included as Appendix B to the Draft EIR.[83] As indicated in the Initial Study, the new buildings would include fire sprinklers,

[82] *Los Angeles Citywide General Plan Framework Draft EIR, January, 1995.*

[83] *Project plans and an associated LAFD permit application were signed, stamped and approved by Joseph Johnson, Inspector, Los Angeles Fire Department, on February 27, 2007.*

fire alarm devices, and all other approved fire safety technologies in compliance with local and State code requirements for proposed occupancies. In addition, the project would also meet all fire flow requirements set forth by the LAFD.

COMMENT NO. 4-3

Water Conservation

LADWP has a number of energy efficiency and water conservation programs. Since the proposed project is in the planning and design phase, it may be an opportunity to incorporate some of these measures in the design and operations of the proposed facilities.

LADWP is always looking for means to assist its customers to use water resources more efficiently and welcomes the opportunity to work with new developments to identify water conservation opportunities. Some water conservation measures are enclosed. Mr. Thomas Gackstetter is the Water Conservation Program Manager and can be reached at (213) 367-0936 or by e-mail at thomas.gackstetter@water.ladwp.com.

Please note that this letter pertains to the Water System only. Issues related to power needs can be addressed to Mr. Wayne Hinkson at (818) 771-4059 or by e-mail at wayne.hinkson@ladwp.com. Issues related to energy efficiency and "Trees for a Green LA" can be addressed to Mr. Stephan Matsuda at (213) 367-4947 or by e-mail at steve.matsuda@ladwp.com. Issues related to green power and electric transportation can be addressed to Mr. William Glauz at (213) 367-0410 or by e-mail at william.glauz@ladwp.com. Issues related to solar energy can be addressed to Ms. Josephine Gonzalez at (213) 367-0414 or by e-mail at josephine.gonzalez@ladwp.com.

Please include LADWP in your mailing list and address it to:

Mr. Charles C. Holloway
Supervisor of Environmental Assessment
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

If there are any additional questions, please contact me at (213) 367-1235 or by e-mail at luis.nuno@water.ladwp.com.

Luis Nuno
Engineer of East Valley District
Water Distribution Engineering

RESPONSE NO. 4-3

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As discussed in the Initial Study, the project would comply with water conservation measures required by Titles 20 and 24 of the California Administrative Code to reduce the projected water demand. The project would also include landscaping consisting of native, drought-tolerant vegetation such as trees and plants permitted under the Mulholland Scenic Parkway Specific Plan. In addition, the project would potentially introduce artificial turf in the athletic field which would require less maintenance than natural grass. As discussed in Section II, Project Description, the project would include energy efficiency upgrades with the introduction of a Central Plant, as well as energy-efficient illumination sources with low intensity to minimize off-site visibility. Furthermore, the School is also evaluating the feasibility of solar roofing materials which would be integrated with the building design to provide a clean, renewable source of solar electric power.

COMMENT NO. 4-4

IMPACT OF THE PROPOSED PROJECT ON THE
WATER SYSTEM AND METHODS OF CONSERVING WATER
DEPARTMENT OF WATER AND POWER

IMPACT ON THE WATER SYSTEM

If the estimated water requirements for the proposed project can be served by existing water mains in the adjacent street (s), water service will be provided routinely in accordance with the Department's Rules and Regulations. If the estimated water requirements are greater than the available capacity of the existing distribution facilities, special arrangements must be made with the Department to enlarge the supply line(s). Supply main enlargement will cause short-term impacts on the environment due to construction activities.

In terms of the City's overall water supply condition, the water requirement for any project which is consistent with the City's General Plan has been taken into account in the planned growth of the Water System. Together with local groundwater sources, the City operates the Los Angeles--Owens River Aqueduct and is a member of the Metropolitan Water District of Southern California (MWD). These three sources will supply the City's water needs for many years to come.

Statewide drought conditions in 1987 through 1991 dramatically illustrated the need for water conservation in periods of water shortage. However, water should be conserved in Southern California even in years of normal climate because electrical energy is required to deliver supplemental MWD water supplies to the City and the rest of Southern California. Conserving water will minimize purchases from MWD and contribute to the national need for energy conservation.

RESPONSE NO. 4-4

This comment confirms that the water supply requirements of the project can be accommodated by the existing water distribution system. As discussed above, the project would comply with water conservation measures such as those required by Titles 20 and 24 of the California Administrative Code. Furthermore, the project would include water conservation features such as landscaping consisting of native, drought-tolerant vegetation and the potential use of artificial turf for the athletic field. The project would also include energy efficiency upgrades with the introduction of a Central Plant, integrate energy saving features such as low-intensity lighting, and potentially introduce solar energy rooftops. As such, the project would conserve water and electrical energy, minimizing purchases from MWD and contributing to the national need for energy conservation.

COMMENT NO. 4-5

WATER CONSERVATION

The Water System will assist residential, commercial and industrial customers in their efforts to conserve water. Recommendations listed below are examples of steps which would conserve water in both new and old construction.

1. Automatic sprinkler systems should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

2. Reclaimed water should be investigated as a source to irrigate large landscaped areas.

3. Selection of drought-tolerant, low water consuming plant varieties should be used to reduce irrigation water consumption.

4. Recirculating hot water systems could reduce water waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet.

5. Ultra-Low-Flush toilets and water, saving showerheads must be installed in new construction and when remodeling.

6. Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.

In addition, the provisions contained in the Water Conservation Ordinance of April 1988 must be adhered to.

More detailed information regarding these and other water conservation measures can be obtained from the Department's Conservation Center by calling (800) 827-5397.

RESPONSE NO. 4-5

As indicated in Response to Comment Nos. 4-1 and 4-3, above, the project would comply with required water conservation measures and include water and energy conservation features.

LETTER NO. 5

Vivian Gumbiner, Chair
Ellen Vukovich, Member, Board of Directors
Sherman Oaks Homeowners Association
Post Office Box 5223
Sherman Oaks, CA 91413

COMMENT NO. 5-1

We are writing you on behalf of Sherman Oaks Homeowners Association, in our organized capacity as representatives of the Concerned Neighbors of Buckley Committee, with our concerns and issues about Buckley School's Expansion Plan.

Size of project: The sheer size of the project is too large for the neighborhood. The school is located at the end on a cul-de-sac on an entirely residential street and partially surrounded by property of the Santa Monica Mountains Conservancy. Although the school declares their students have less square footage per student than other private schools, that is misleading considering commercial streets or much larger streets border the other schools. Consider that the Plans call for additional square footage equivalent to building a large supermarket into a (our!) residential neighborhood. The School claims that it has not added space in 40 years. However, when the Buckley School eliminated its Nursery School several years ago, they gained additional classroom space for their older students. The additional square footage therefore enables them increase [sic] their enrollment which will create more traffic, and pollution to nearby homes as well as add to Ventura Boulevard's serious traffic congestion.

RESPONSE NO. 5-1

As discussed in Section II, Project Description, of the Draft EIR, the additional square footage proposed would allow the School to update many of its existing aging and inadequate facilities. From a regulatory perspective, various campus buildings require improvements to meet current Americans with Disabilities Act (ADA) regulations, Fire Code requirements, and California Energy Code standards. In general, many of the existing buildings and classrooms are functionally outdated and inefficient. Standards for modern classroom sizes have changed since construction of the existing campus in late 1960s due to the additional space required for computers and other interactive instructional areas. Furthermore, the number of students that can be accommodated in some courses is limited by the physical size of each classroom, rather than being dictated by the educational needs of the student population. College preparatory curriculum has also changed over time, requiring advanced honors, and college advanced placement sections, which occur at the same time as regular classes. As a result, more classrooms are needed to provide for these additional sections. Furthermore, the passage of Title IX of the U.S. Code, which requires schools to offer equal and sufficient athletic opportunities to

both girls and boys, combined with Buckley's "no cut" policy for Middle School athletic teams has created the need for additional athletic facilities space.

While it is true, as noted in the comment above, that closure of the nursery school in 2003 yielded additional classroom area for The Buckley School, that space has since been used for Lower School students and activities.[84] The project, however, focuses primarily on additional instructional space for the Middle and Upper Schools, which remain inadequate relative to modern day educational and regulatory standards. The existing campus buildings were constructed in the late 1960s through the late 1970s.

The compatibility of the project, in terms of land use, design and School operations, with the surrounding neighborhood is evaluated in Section IV.H, Land Use, of the Draft EIR. As discussed therein, the existing Buckley School campus has been developed for use as a private school since the late 1960s. Educational uses have therefore been part of the land use relationships within the local residential area for over two generations. Schools are often sited in residential neighborhoods because their purpose is to educate a subset of the residential population. Public school properties are, for the most part, located throughout the City of Los Angeles in residential neighborhoods, though most public school sites are zoned "Public Facility" due to public ownership. Private schools, while also generally located in residential areas, are typically permitted as a conditional use subject to issuance of a CUP in which conditions are specified to ensure compatibility with nearby residential uses. Therefore, schools are a necessary and appropriate use in residential areas. Project consistency with the site's existing and proposed land use and zoning designations further supports the suitability of proposed development at the project site. Additionally, the floor area ratio (FAR) of The Buckley School campus following project development would be approximately 0.21:1, substantially less than the 3:1 FAR permitted within the RE40-1-H (Height District 1) zone.

As demonstrated in the EIR analysis, project development would not alter the overall character of the surrounding neighborhood. While the project would allow for an increase in floor area and a modest increase in the number of students, none of the operational characteristics of the project would result in a significant environmental impact. Despite an increase in the intensity of development on-site, the overall massing and scale of the site would be similar to existing conditions due to project sensitivity relative to building siting, building heights that are generally consistent with existing building heights, and the use of an enclosed parking facility. Additionally, the project includes a Transportation Demand Management (TDM) Plan to minimize vehicle trips to the site (discussed in Section IV.J, Transportation and Circulation, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final

[84] *The preschool was phased out one year at a time, with the last class finishing in June 2003.*

EIR). Specifically, Mitigation Measure J-4, as revised within this Final EIR, requires that the TDM Plan, which will be refined in consultation with the Los Angeles Department of Transportation (LADOT), achieve a reduction of at least 75 project-related trips during the A.M. peak hour, resulting in no increase to the existing A.M. peak-hour trip generation level, and a reduction of at least 4 project trips during the School P.M. peak hour. In addition, although not required as mitigation, the School has volunteered to reduce the project-related daily trip generation of 278 vehicle trips by at least 40 percent (i.e., a reduction of at least 111 trips). The Applicant also volunteers to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan.[85] Additionally, Mitigation Measure J-8, as revised within this Final EIR, requires the Applicant to submit a Traffic Monitoring Compliance Report to LADOT during the fall of each year to ensure compliance with the trip cap and imposes penalties if that trip cap is exceeded. Furthermore, the operational impacts of the project on traffic conditions would be less than significant with implementation of TDM measures and other mitigation measures, including Mitigation Measures J-5 and J-6, which require implementation of physical improvements to the surrounding street network. In addition, as discussed in Section IV.B, Air Quality, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, air quality impacts associated with operation of the project would be less than significant.

COMMENT NO. 5-2

Further, the Sherman Oaks community is about to undergo a series of major land development projects which will also compound our neighborhood's traffic problems.

RESPONSE NO. 5-2

Section 15130 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) requires that Environmental Impact Reports (EIRs) analyze cumulative impacts of a project. The analysis of cumulative impacts need not be as in-depth as what is provided relative to the proposed project, but rather is to "be guided by the standards of practicality and reasonableness." According to CEQA Guidelines Section 15130(b)(1), reasonably foreseeable growth may be based on either of the following:

- A list of past, present, and probable future projects producing related or cumulative impacts including, if appropriate, those projects outside the control of the agency; or

[85] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the TDM Plan.*

- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact.

In accordance with the CEQA requirements outlined above, cumulative impacts were assessed for each environmental issue throughout the Draft EIR. Specifically, as indicated in Section IV.J, Transportation and Circulation, Subsection 3, Cumulative Impacts, of the Draft EIR, the traffic analysis incorporated forecasted traffic increases due to ambient growth and related projects through the future study year (2014), when project buildout would occur.[86] Ambient growth levels were based on an analysis of trends in traffic growth within the project area of San Fernando Valley over the last several years. Upon discussion with Los Angeles Department of Transportation (LADOT), an annual traffic growth of two percent was utilized to account for increases in traffic resulting from minor projects, projects not yet proposed, and projects outside of the study area. This growth factor was applied to the existing (2006) traffic volumes to develop an estimate of future (2014) baseline volumes. In addition to the use of an annual growth rate, a related projects list was obtained from LADOT and the City of Los Angeles Planning Department. As shown in Table 10, Related Projects Descriptions and Trip Generations in Appendix L of the Draft EIR, potential related projects within an approximate 2.5 mile radius of the project site were evaluated for future traffic volume. These volumes were then combined with the growth-factor induced traffic volumes to provide a conservative "benchmark" estimate of future traffic conditions.

A Congestion Management Plan (CMP) analysis was also conducted to evaluate traffic impacts on a larger, regional scale. As such, cumulative impacts on intersections, residential neighborhoods, and on the regional transportation system have been analyzed. Impacts pertaining to site access/queuing are localized, and no other related projects are located within the immediate project vicinity. Therefore, as demonstrated in the Draft EIR, the project would not contribute to cumulative impacts related to issues of traffic.

COMMENT NO. 5-3

Number of Students: The school is asking for 80 more students with a 15-year cap on enrollment. The additional 80 students will require more staff and all of these people will need to travel through the City and residential streets to reach their school and place of employment. We find that this creates an undue burden on the residential community. Buckley is, after all, a

[86] *Also refer to Section II, Corrections and Additions, of this Final EIR for discussion of operational impacts associated with a project buildout year of 2012; since the project's potential operational impacts are linked to the proposed student enrollment increase, an operational buildout year of 2012 would result if the alternative construction schedule is implemented.*

business operating in a unique environment. Needless to say, the traffic is bad during the peak hours now, and the EIR says the traffic will worsen with the construction. In fact, as reported in the EIR on pages 347 and 348, the Buckley School already has a higher trip generation values than the reported national ITE trip-generation values at other private schools. Clearly, that must be addressed by the City.

RESPONSE NO. 5-3

As discussed in Section IV.J, Transportation and Circulation, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, with implementation of mitigation measures, no significant impacts associated with operation of the proposed project, including the introduction of 80 students over a specified timeframe, would occur.[87] In addition, a comprehensive analysis of project construction traffic was also conducted. It was determined that short-term and intermittent significant impacts due to construction-related traffic would occur on Stansbury Avenue south of Valley Vista Boulevard. No feasible physical measures are available to mitigate the construction traffic impacts to below a level of significance. The only option would be to reduce the amount of daily construction traffic generated, which would extend the construction time frame so that many fewer workers and construction vehicles are involved at any given time. However, such a measure would be greatly inefficient, more costly, and more disruptive over the long term to School operations, student activities, and the surrounding residential neighborhood. As outlined on page 375 of the Draft EIR, the School will implement Mitigation Measures J-1 through J-3 during construction to minimize construction-related traffic impacts and to address neighborhood concerns.

The commentor is correct with regard to the trip generation rates used for the analysis. The weekday A.M., School P.M., and Commuter P.M. peak-hour trip generation rates for the proposed project were determined using empirical data collected for the existing School. As previously described, these data, collected in October 2004, counted the number of vehicles observed to enter/exit all access points for the School as well as the off-site parking lot during the peak hours. These empirical trip generation rates for the daily, morning, and afternoon peak hours exceeded those of the standard ITE rates. Therefore, these empirical generation rates were used to calculate project trip generation levels and provide a more conservative analysis of project traffic. The use of the empirical rates was also approved by LADOT.

However, as described in Section II, Corrections and Additions (Subsection G), of this Final EIR, the empirical daily trip generation rate for the School has been revised and is now a

[87] *Furthermore, the School has volunteered a condition that it would not request another enrollment increase for a period of 20 years from the issuance of a Certificate of Occupancy for the Middle and Upper School Main Academic Center. Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for further discussion.*

lower daily rate.[88] Use of this revised daily rate, which has been approved by LADOT, results in no significant project daily traffic impact on Stansbury Avenue south of Valley Vista Boulevard. The significant peak-hour project impacts as previously analyzed and identified would not change. Mitigation Measure J-4, as revised within this Final EIR, requires that the TDM Plan achieve a reduction of at least 75 project trips during the A.M. peak hour, resulting in no increase to the existing A.M. peak-hour trip generation level, and a reduction of at least 4 project trips during the School P.M. peak hour. In addition, although not required as mitigation, the School has volunteered to reduce the project-related daily generation of 278 vehicle trips by at least 40 percent (i.e., a reduction of at least 111 trips). The Applicant also volunteers to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan.[89] With this revised measure, together with the previously required physical mitigation measures, significant project impacts would be reduced to a less than significant level.

Please refer to Response to Comment No. 5-1 regarding the compatibility of the project with the surrounding neighborhood. It is noted that The Buckley School is not a commercial business, but rather a not for profit educational/institutional use.

COMMENT NO. 5-4

Traffic Study Inconsistency: We question the validity of the numbers included in the EIR. On December 14, 2006 from 7:15 a.m. to 8:45 a.m., Vivian Gumbiner, a member of our Committee, counted the cars that crossed Valley Vista and Stansbury and headed south onto the Buckley School as well as the cars that turned onto Stansbury and headed south onto the Buckley campus. A hand held counter was used to count the trips, the same method, we believe, that the counters used in the study quoted in the EIR. During that time period, Ms. Gumbiner counted 910 trips in bound and outbound for the Buckley School. This number is adjusted for the number of cars that remained on the campus using the same percentage adjustment that was used in the reports issued by Crain & Associates (see page 361 of the DEIR). The figures in the DEIR in of [sic] 686 and 702 INCLUDED the trips generated at the 100 space-parking site leased by the Buckley School off-campus at Fashion Square (Riverside and Woodman Avenues). The Concerned

[88] *Following publication of the Draft EIR, it was determined that a mechanical error occurred at the Stansbury Avenue driveway counter between 4:30 P.M. and 4:45 P.M. on Wednesday, October 27, 2004, yielding an anomaly within the count data. This error resulted in an overstated vehicular trip count, which in turn caused an overestimation of existing daily trips, an overprojection of future project-related trips, and an overstatement of residential street segment impacts. By correcting this error within this Final EIR, the project would be subject to a lower trip cap against which the City would measure the School's compliance with its voluntary 40 percent daily project trip reduction specified in Mitigation Measure IV.J-4. Further, correction of this error would not result in the provision of any lesser level of mitigation than previously provided in the Draft EIR. Refer to Section II, Corrections and Additions (Subsection G), of this Final EIR for further discussion.*

[89] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the TDM Plan.*

Neighbors of Buckley study count of 910 DID NOT include any trips made into the Fashion Square lot. Therefore, the traffic numbers in the DEIR are grossly inaccurate. This then raises an important question that must be addressed by the City. Why would the school rely upon lower traffic counts? Could it be that they didn't want them to be higher than the other private schools shown in the DEIR? If the figures for the morning traffic were inaccurate, than [sic] one can only wonder about the commuter peak and afternoon peak figures given in the DEIR. In any event, we believe that the traffic conclusions made in the DEIR are based on inaccurate figures/counts, thus requiring the need for new traffic studies.

RESPONSE NO. 5-4

For the traffic study, automated 24-hour traffic counts were collected at the two existing driveway locations on Stansbury Avenue and Camino de la Cumbre during normal school operating. A manual count was also conducted at each School driveway during the peak hours. A concurrent count of student-operated vehicles utilizing off-site parking at the Sherman Oaks Fashion Square parking lot leased by the School was also conducted. (Since the vehicle trips at the Fashion Square lot are generated by existing School students, it is appropriate to include these trips in the determination of the total existing School traffic and empirical trip rates.) As with the study intersections, data collection at the two existing driveways (on-site) and Fashion Square lot (off-site) occurred on typical school days and were used to determine the peak-hour volumes for the School. These traffic count data sheets are included in Appendix E of the traffic study provided as Appendix L to the Draft EIR.

As described in Section II, Corrections and Additions (Subsection G), of this Final EIR, the empirical daily trip generation rate for the School has been revised and is now a lower daily rate.[90] The peak-hour trip generation rates were not revised because they were based on manual traffic counts conducted at the Stansbury Avenue and Camino de la Cumbre driveways and the off-site Fashion Square Lot on Monday, October 25, 2004 and were therefore not affected by the daily count error at the Stansbury Avenue driveway. As indicated in Section II, Corrections and Additions (Subsection G), the existing peak-hour traffic volumes for the School, as shown in Appendix L (Sub-Appendix C) of the Draft EIR, were accurate. These volumes show 702 vehicles (393 inbound, 309 outbound) during the A.M. Peak Hour, 443 vehicles (206 inbound, 237 outbound) during the School P.M. Peak Hour, and 230 vehicles (82 inbound,

[90] *Following publication of the Draft EIR, it was determined that a mechanical error occurred at the Stansbury Avenue driveway counter between 4:30 P.M. and 4:45 P.M. on Wednesday, October 27, 2004, yielding an anomaly within the count data. This error resulted in an overstated vehicular trip count, which in turn caused an overestimation of existing daily trips, an overprojection of future project-related trips, and an overstatement of residential street segment impacts. By correcting this error within this Final EIR, the project would be subject to a lower trip cap against which the City would measure the School's compliance with its voluntary 40 percent daily project trip reduction specified in Mitigation Measure IV.J-4. Further, correction of this error would not result in the provision of any lesser level of mitigation than previously provided in the Draft EIR. Refer to Section II, Corrections and Additions (Subsection G), of this Final EIR for further discussion.*

148 outbound) during the Commuter P.M. Peak Hour (4:15 P.M. – 5:15 P.M.). This count includes the inbound and outbound vehicles observed at the off-site Fashion Square lot.

The commentor references a total of 686 vehicle trips at the School driveways. This count does not include the students observed to utilize the off-site Fashion Square lot. These students were excluded from the driveway volumes used for the average vehicle ridership (AVR) calculation since the focus of the AVR calculation is the campus driveway activity. This exclusion yielded a more conservative AVR calculation. Student usage of the off-site lot was included in the empirical data used to determine the weekday A.M., School P.M. and Commuter P.M. Peak Hour trip generation rates for the project.

In addition, the time period of the commentor's referenced count, 7:15 – 8:45 A.M., is 90 minutes, which is 30 minutes longer than the 60 minutes in the traffic study's A.M. peak hour. If the referenced count of 910 trips is divided by 1.5 hours (i.e., 90 minutes), the result is 607 trips per hour, which is less than the 686 existing A.M. peak-hour trips counted at the Stansbury driveway and used in the traffic study. Therefore, the trip generation numbers in the traffic study are not understated and reflect the School's typical morning peak-hour trip generation.

COMMENT NO. 5-5

Building Height: Why do these buildings need to be so high? Why can't architectural changes be made so they do not need to exceed current building limits? Can the ceilings be lowered inside the buildings so the building height can also be lowered? The height limits are made into law for a reason, and we cannot understand why the proposed buildings need to be taller than most buildings on the busy commercial street of Ventura Boulevard. The approval of the exceptions for building height will serve as a precedent that will have a major impact on hillside and residential neighborhoods. These buildings will be visible from the view shed of Fossil Ridge Park. Although the DEIR says that the park is not useful because of overgrown brush and a lack of paths, just as Buckley is seeking to improve its facilities, we hope that one day the park will receive the funding it deserves to become a more viable park. When that happens, it would be a shame if the view shed were already ruined by large, looming buildings below.

RESPONSE NO. 5-5

The project request for a Specific Plan Exception and Modification of height regulations to allow building heights up to a maximum of 55 feet is addressed in Section IV.H, Land Use, of the Draft EIR. The potential aesthetic and view impacts associated with the proposed building heights are described in Section IV.A, Aesthetics. The School is currently subject to a 40-foot maximum height limit applicable to development within the Mulholland Scenic Parkway Specific Plan (MSPSP) Outer Corridor, as well as a more restrictive 36-foot maximum height limit pursuant to LAMC §12.21A 17(c) due to its location within a residential hillside zone. As

discussed in the Draft EIR, one existing structure and two of the proposed buildings would exceed the permitted maximum height.[91] The proposed 55-foot height maximum for the Middle and Upper School Main Academic Center and associated changes in the surrounding finished grade would be necessary to accommodate the project's excavated soils on-site, which would serve to nearly eliminate the need for soil export or import.[92] In essence, the lower parking level of the proposed parking facility would be constructed at roughly current grade (approximately 776 feet (asl)), with the upper parking level and the Main Academic Center above, and the areas immediately east of the parking levels would be filled in with soil materials graded or excavated throughout the project site.[93] The design of this building, as currently proposed, reflects major changes to the project that were implemented in response to community input, as well as the desire of the School to both limit expansion of the campus from its existing building footprint and to minimize the amount of soil materials requiring export from the site. Soil export was voiced as a serious issue of concern to residents surrounding the School, as evidenced by public comments received on an earlier project proposal (which is now analyzed as Alternative E, Previous Project Alternative, within Section V, Alternatives, of the Draft EIR). While the height of the Main Academic Center could be reduced by lowering the building and the surrounding grade, such a change in design would necessitate substantially more excavation and ultimately increased soil export from the campus.[94] Furthermore, lowering the Main Academic Center would place first-story classrooms at a semi-subterranean or subterranean level, and windows would be substantially reduced in size or eliminated entirely from the classrooms.[95]

For comparison, it is noted that Alternative C, Single Level Parking Facility Alternative, which would eliminate one level of the project's enclosed parking facility, would involve maximum building heights of 45 feet from existing grade, which would still exceed applicable height limits. Similarly, Alternative D, No Parking Facility Alternative, which would eliminate

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[91] *It is noted that two existing buildings (one of which would be removed as part of the project) have legally non-conforming building heights that exceed the maximum 36-foot height limit for a residential hillside zone set forth by LAMC §12.21A 17(c).*

[92] *The proposed building heights referenced throughout this document each include a two-foot mansard roof and thus reflect the highest point of the roof, per LAMC §12.03. On each of the proposed buildings, rooftop mechanical equipment will extend approximately seven feet above the high point of the roofline. Such rooftop equipment would not count towards building height, per LAMC §12.21.1 B 3.*

[93] *Additionally, soil materials excavated on-site would be used as fill to raise the level of the athletic field by approximately 10 inches.*

[94] *For example, excavation required for Alternative E, Previous Project Alternative, would involve an estimated 48,500 cubic yards of soil export associated with the subterranean parking facility proposed under that Alternative.*

[95] *As discussed in Section II, Project Description, of the Draft EIR, many of the existing buildings and classrooms are functionally outdated and inadequate; for example, there are six classrooms with no windows. The project has been designed to eliminate such deficiencies in School facilities and provide appropriate, modernized instructional space for school programs.*

entirely the project's enclosed parking facility, would also involve maximum building heights of 45 feet in order for the proposed classrooms to be above grade.

The commentor's suggestion to lower the proposed ceiling heights is not practicable. Schools typically have 10-foot ceilings, which includes space for fire protection devices and fluorescent lights. Additional space of up to four to five feet is necessary between floors for structural components, duct work, and additional acoustical requirements for certain rooms. The Main Academic Center building would have approximately 9-foot ceilings, with lower ceilings in some rooms as practicable and higher ceilings where necessary (e.g., the library and for performing arts).

It is also noted that the Middle and Upper School Main Academic Center would visually appear as 31.1 to 43.6 feet in height from most vantage points due to the sloping nature of the site's natural topography as well as the grade changes proposed in this area of the campus. The high point of the building would occur on the eastern façade, which would not be visible to neighboring residential properties. Similarly, the Academic Building West, which would have a formal height of 39 feet as measured from existing grade, would visually appear no greater than 32 feet as measured from finished grade. All other proposed building heights would fall within the 36-foot height limit specified by the LAMC hillside requirements. Additionally, no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.[96] Furthermore, as analyzed in Section IV.A, Aesthetics, the project would not create an inappropriate contrast between project elements and the area's valued aesthetic image, and existing views of and across the campus would not be noticeably altered despite any increase in building height.

Relative to Fossil Ridge Park, despite limited viewing locations within Fossil Ridge Park, an analysis of project impacts on views from the park is provided in Section IV.A, Aesthetics. As discussed, views of campus development would not change significantly, and the proposed structures would not substantially obstruct views of valued visual resources.

COMMENT NO. 5-6

Noise: The noise from the construction will be an annoyance and danger to neighbors. The school intends to do construction six days a week! The noise levels in the DEIR are termed unacceptable and we believe that those numbers are also not accurate. When a member of our

[96] *The Disney Pavilion is 38 feet in height. Given the sloping nature of the campus, the rooflines of all proposed buildings within the Main Academic Campus would fall below that of the Disney Pavilion, including those buildings with greater building heights which would be located at lower elevations. Due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights. Refer to Figure IV.4-7 in Section IV.A, Aesthetics, for an illustration of the proposed building elevations.*

committee spoke to a consultant from PCR Services Corporation about the placement of the sound meters, he admitted that the placement of one of the five sound meters was placed such that it did not accurately reflect the ambient sound levels. The sound levels will actually be much higher because it was not placed near the retaining wall that will amplify the noise at the area. They were supposed to place the meter near the wall, but never made the proper arrangements with the property owner. It is hard to imagine living with unacceptable sound levels for about 7 years. We find it interesting that the Buckley School told a neighborhood meeting audience that construction would be timed around the students' summer vacations. If they don't want their students affected by the excess noise, then why should the neighbors suffer with it?

RESPONSE NO. 5-6

The construction noise analysis assumes a worst case analysis, that is, the maximum amount of equipment located on-site would be operating simultaneously along the property line closest to sensitive receptors. Under real world conditions, this scenario would not take place on a regular daily basis. Maximum construction noise levels would occur during the preparatory work (e.g., site grading) and finishing work (e.g., paving operations and the application of architectural coatings such as paints and other building materials), which would last several months during each phase. During the preparatory and finish work, all equipment is not expected to be operating simultaneously on a daily basis.

Construction activities such as exterior finishing work will occur while school is in session. As discussed in Section IV.I, Noise, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, regarding on-site (i.e., The Buckley School campus) noise impacts, students and faculty members that are present on the project site during construction activities would also experience significant noise impacts during Phases 1, 2, and 3 of construction.

As a result of the noise impacts, mitigation measures have been provided in the Draft EIR to lessen the noise impact to sensitive receptors. Nevertheless, noise impacts during construction would exceed the 5 dBA significance criterion at multiple receptor locations intermittently during all project construction phases even with implementation of feasible mitigation measures. As such, construction-period noise impacts would be temporary, significant and unavoidable.

Ambient sound level measurements were made in accordance with Section 111.02 of the City of Los Angeles Ordinance which requires noise meters to be placed at least ten feet or more from the nearest reflective surface (retaining wall). Microphones were also placed four to five feet above the ground and calibrated immediately prior to sound level measurements. Placement of a noise meter away from reflective surfaces would more accurately quantify direct ambient noise levels.

In addition, sound reflection from hard surfaces such as retaining walls and building walls have been described and accounted for on page 304 of the Draft EIR. A site-specific sound reflection test has been performed for the project and demonstrates that at the mentioned location, reflective noise levels would be approximately 15 dBA less than the direct measured sound. The net result of the reflective sound would translate in a 1 dBA increase in the overall sound level.

Regarding the weekly construction schedule, the City of Los Angeles Noise Ordinance (LAMC Section 111.0) restricts the generation of construction noise to Monday through Friday from 7 A.M. to 9 P.M. and on Saturdays and national holidays from 8 A.M. to 6 P.M. The School has volunteered more restrictive construction hours for the project, such that construction could occur during most phases Monday through Friday from 7:00 A.M. to 5:00 P.M. and Saturdays from 8:00 A.M. to 5:00 P.M. During Phase 2, construction days and hours would be Monday through Friday, 7:00 A.M. to 5:00 P.M. each day from September 2nd to April 30th; Monday through Friday, 7:00 A.M. to 7:00 P.M. from May 1st to September 1st; and Saturday, 8:00 A.M. to 5:00 P.M. throughout the year.[97] These construction hours are still more restrictive than those permitted by the City.

COMMENT NO. 5-7

School Neighborhood Barrier: Currently the barrier between the Buckley School and the residences on Camino de la Cumbre consists of a rusted chain-link fence topped by three rows of barbed-wire, also rusted. This fence, along with being an eyesore, exceeds the municipal code height of 6 feet in several areas and in fact, is at least 7 feet in many areas. Mind you, the direction the barbed-wire is facing is designed to keep their students in, not strangers out. It is not fair to neighbors to have to look at this horrible view daily. Certainly they do not have any building or fencing directly visible by students or staff on their campus that looks so bad. In the DEIR, the school states that the fence is `grandfathered" in and they have no plans to change it. For years the neighbors have asked the school to make the fence more appropriate for the neighborhood, and they have declined to do so. A visual survey done by the Concerned Neighbors of Buckley has found several other private schools that blend into their neighborhoods. The fencing needs to replaced so the school blends into the neighborhood and is not an eyesore.

[97] *Once a building is fully enclosed, interior construction activities occurring between May 1st and September 1st of Phase 2 may continue until the hours permitted by the City. Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for further details.*

RESPONSE NO. 5-7

As discussed in Section IV.A, Aesthetics, of the Draft EIR, the existing chain link and barbed wire fencing along the campus perimeter on Camino de la Cumbre was installed prior to approval of the Mulholland Scenic Parkway Specific Plan (MSPSP) and the associated MSPSP Design and Preservation Guidelines, and therefore is considered a legal, non-conforming structure.[98] Nonetheless, the School plans to remove the barbed wire as part of the project.[99] As also part of the project, a landscape plan would be implemented and a substantial amount of existing perimeter landscaping would be retained to provide privacy for neighbors and visual screening for the School. In addition, separate from the project, the School has recently begun to augment the landscaping along Camino de la Cumbre.[100] This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 5-8

The School likes to tout that they have been responsive to neighbors' requests, and this is a perfect example of a request that has been declined. Instead, they want to install a 10 foot fence at the Camino de la Cumbre gate, to which we are opposed. Again, this would be completely out of character in this residential neighborhood and they should not be granted this exemption in fence height.

RESPONSE NO. 5-8

The Buckley School Campus Enhancement Plan has evolved from a planning and design process dating back to 1997 that has included community input, as detailed in Section II, Project Description, of the Draft EIR. The project has undergone numerous revisions over the years and the School has continued to work with the community to address their concerns while accommodating the School's educational needs. Most recently, a previous plan (described in the November 2004 EAF/Draft Initial Study and the NOP dated January 12, 2005) was revised to reflect the current proposal in response to community concerns regarding construction impacts and soil export.

A new wrought iron gate is proposed at the Stansbury Avenue entrance to the campus, and as discussed in Section IV.H, Land Use, project development would not alter the overall character of the campus or the surrounding neighborhood. The project requests a Modification

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[98] *It is noted that black or dark green chain link is permitted per the MSPSP.*

[99] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR, for further discussion.*

[100] *Planting activities were temporarily halted due to frost in early 2007. Once the remaining plants have recovered, additional planting will occur along the length of the campus fencing and damaged plants will be replaced.*

of the height regulations, pursuant to LAMC §12.24F, to allow landscaping, hedges and fences/gates/walls up to 10 feet in height within the required yards at the Stansbury Avenue and Camino de la Cumbre driveways.[101] The additional height is requested for security purposes. This Modification is subject to City review and approval.

In a good faith effort to work with the surrounding community, the School has made several concessions to address neighbors' concerns. As examples, as discussed throughout this Response to Comments section as well as in Section II, Subsection G, Corrections and Additions, of this Final EIR, the School plans to remove the barb wire along the fencing on Camino de la Cumbre, would not request another enrollment increase for a period of 20 years from the issuance of a Certificate of Occupancy for the Middle and Upper School Main Academic Center, and would implement a Neighborhood Traffic Protection Plan designed to create a formal mechanism for addressing issues of community concern that may arise during the construction and operation of the School. The commentor's suggestion that the approval be denied is noted for the record and will be forwarded to the decision-makers for consideration.

COMMENT NO. 5-9

Duration of Construction: Although the City has no mandate to require when construction is to commence and conclude on a project, we respectfully request that you consider when finalizing your findings that the consequences of your decisions will impact a community (and our neighborhood) for an extended period of time (5 to 7 years). Clearly, this points to the underlying point about this Expansion Proposal - it is excessive; it asks a large residential neighborhood to endure an exceedingly long construction period in order to farther its ambitious expansion plans; it exposes children to a protracted, and potentially dangerous environment during construction, it creates an unprecedented six-day a week construction nightmare in a quiet residential neighborhood; and it raises the ultimate question: will traffic, congestion, pollution be mitigated or not - especially if the City relies on faulty and questionable data as explained in this letter?

Thank you for your consideration.

RESPONSE NO. 5-9

As indicated in Section II, Project Description, of the Draft EIR, the three general phases of construction would occur over the course of approximately five years, spread out over an approximate six and a half year timeframe.[102] As planned, each construction phase would begin

[101] *The existing entrance gates are also greater than 6 feet, with the front gate measuring approximately 9.5 feet and the rear gate measuring 7 feet.*

[102] *Refer to Section II, Corrections and Additions, of this Final EIR, for a correction to the duration of construction originally presented in the Draft EIR.*

with an approximate two month period of preparatory work, with more intensive construction activities beginning in approximately May of each phase, to coincide with the end of each school year. The proposed construction plan has been designed to minimize disruption to School operations as well as the surrounding community to the extent feasible. Similarly, the alternative construction phasing schedule, described in Section II, Corrections and Additions, of this Final EIR, if implemented, would be designed to minimize disruptions while allowing the School to most efficiently address its project objectives and respond to community concerns, in light of available resources at the commencement of construction. A reduction in the number of days per week on which construction occurs would serve to prolong the duration of the overall construction period. The City of Los Angeles effectively permits construction to occur six days a week during designated daytime hours, per its Noise Regulation (LAMC Section 111.0), which expressly prohibits construction noise during early morning and evening hours Monday through Saturday and entirely on Sunday (refer to Response to Comment No. 5-6 for further discussion).

Construction of the project would require implementation of mitigation measures such as temporary "truck crossing" warning signs that shall be placed in each direction in advance of the intersection of Stansbury Avenue and Valley Vista Boulevard. In addition, a flag person or persons shall be positioned near the project site to assist truck operators in entering and exiting the project area, and to help minimize conflicts with pedestrians and motorists. To the greatest extent possible, the arrival and departure of construction trucks shall be minimized during peak student arrival, departure periods, and peak commuter periods. Furthermore, traffic congestion would be mitigated by a TDM Plan that would improve carpooling, bus ridership, and other alternative modes of transportation for students. With implementation of the TDM Plan, the School shall achieve a reduction of at least 75 project trips during the A.M. peak hour, resulting in no increase to the existing A.M. peak-hour trip generation level, and a reduction of at least 4 project trips during the School P.M. peak hour. In addition, although not required as mitigation, the School has volunteered to reduce the project daily generation of 278 vehicle trips by at least 40 percent (i.e., a reduction of at least 111 trips). The Applicant also volunteers to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan.[103] As discussed in Section IV.J, Transportation and Circulation, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, temporary construction-related traffic impacts would remain significant even after the implementation of mitigation measures. There are no feasible mitigation measures which could reduce construction traffic impacts to levels that are less than significant. The only reasonable alternative mitigation would be to extend the construction timeframe so that there would be fewer construction personnel and vehicles on-site at any give time. However, such a measure would be inefficient as well as costly, would prolong construction, and would disrupt School operations and the surrounding neighborhood for a longer period of time. Nevertheless, the

[103] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR, for updated information regarding the TDM Plan.*

proposed mitigation measures would help to minimize construction impacts to the extent possible. In addition, implementation of mitigation would reduce operational traffic impacts to less than significant levels.

Regarding pollution, as discussed in Section IV.B, Air Quality, of the Draft EIR and amended within this Final EIR, implementation of the proposed mitigation measures would reduce construction emissions for all pollutants. However, the project would exceed the SCAQMD regional significance threshold for NO_x during the most intense construction periods, as well as the SCAQMD Localized Significance Threshold (LST) screening threshold value for PM_{10} during Phase 2 construction. As such, project construction would continue to result in significant impacts even with incorporation of all feasible mitigation measures. Operation of the project following construction would not have any significant and unavoidable impacts on air quality.

LETTER NO. 6

Wil Von Der Ahe
14140 Investments, Inc.
VDA Management Services
16217 Kittridge Street
Van Nuys, California 91406

COMMENT NO. 6-1

As a member of the Sherman Oaks business community, 14140 Investments, Inc. would like to add its support to The Buckley School's proposed Campus Enhancement Plan.

The Buckley School and the members of its community support local businesses and contribute to the community on many levels. They participate in community service projects. The school is a large employer and many of its employees and students live locally. In addition, we believe that strong schools in our community are important to its overall economic health and are an important element of its social network.

We support Buckley's plan and goal to maintain its status as an outstanding school and as an important part of the fabric of Sherman Oaks.

RESPONSE NO. 6-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 7 (Includes two email/written correspondences)

Madeline Bailey
13914 Valley Vista Blvd.
Sherman Oaks 91423

COMMENT NO. 7-1

My husband and I live on Valley Vista Blvd., .3 mile east of the Buckley School. We object to Buckley's expansion plans for so many reasons:

1. This is a residential area. The mansionization going on in our neighborhood is bad enough. We don't wish to have school buildings towering over our homes.

RESPONSE NO. 7-1

Please refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project, as well as the compatibility of the project with the surrounding neighborhood. Please also refer to Response to Comment No. 5-5 regarding the proposed building heights. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 7-2

2. I commute to Century City for work. The longest leg of my 9-mile commute is the .8-mile from my house to Beverly Glen Blvd., primarily because of the difficulty in crossing Stansbury due to the traffic generated by the school. The proposed addition of 100 students and requisite staff will make the traffic even worse.

RESPONSE NO. 7-2

As shown in Table IV.J-3 of the Draft EIR, under existing conditions, the intersection of Valley Vista Boulevard and Stansbury Avenue operates at LOS E during the A.M. peak hour and LOS A during the School P.M. and Commuter P.M. peak hours. LOS A to C are defined as intersections which operate quite well. LOS E represents volumes at or near capacity of the intersection which might result in stoppages of momentary duration and fairly unstable flow.

For future traffic conditions, as presented in Table IV.J-7 of the Draft EIR, prior to the addition of project traffic, the intersection of Valley Vista Boulevard and Stansbury Avenue is forecast to operate at LOS F during the A.M. peak hour and LOS A during the School P.M. and Commuter P.M. peak hours. With the addition of project traffic, this intersection is expected to operate at LOS F during the A.M. peak hour, LOS B during the School P.M. peak hour, and LOS

A during the Commuter P.M. peak hour, as shown in Table IV.J-7 of the Draft EIR.[104] As shown in Table IV.J-7, with implementation of mitigation measures, operation of the project would not result in significant impacts at this or any other intersection.

In addition, in order to eliminate the off-site vehicular queuing that typically occurs on Stansbury Avenue, the existing front parking lot at the northeastern portion of the site would be redesigned to provide adequate site access and circulation for the visitor parking lot, the new two-level enclosed parking facility, and the new arrival plaza. The project's proposed new configuration of circulation space would require all vehicles entering the Stansbury Avenue gate to proceed to the new arrival plaza, visitor parking area, or enter the enclosed parking facility. The new parking facility will provide a queuing capacity for approximately 40 vehicles on the lower level and approximately 29 vehicles on the upper level, for a total of at least 69 vehicles. Vehicles in queue for peak drop-off or pick-up activities would enter the campus via Stansbury Avenue and either continue straight to enter the upper level of the parking facility or turn left to enter the lower level of the parking facility. Both levels would feature a single queuing lane, with supervised loading/unloading activities occurring toward the head of the lane. After completing the pick-up or drop-off activities, vehicles would exit the parking facility.

The total queuing capacity of at least 69 vehicles would be more than adequate to accommodate the School's anticipated typical queuing demand of 46 vehicles, as well as most increases that may sometimes arise due to fluctuations in demand.[105] This queuing capacity, in conjunction with the proposed TDM Plan, would also accommodate the proposed 80-student enrollment increase and the proportionate increase in faculty/staff members. In addition, the new arrival plaza would serve to maximize the vehicle queuing capacity of the campus by enabling nine buses to stage on-site for student loading and unloading outside of the main vehicular circulation and queuing areas. The buses, once loaded, would have priority egress from the site and the bus staging area would be opened to passenger vehicle use during the off-peak period. Furthermore, parking attendants and security personnel would continue to direct traffic flow and student drop-off/pick-up activities in order to maximize the efficiency of the planned loading area and to eliminate the vehicle queues on Stansbury Avenue.

[104] *Refer to Section II, Corrections and Additions, of this Final EIR for discussion of operational impacts associated with a project buildout year of 2012; since the project's potential operational impacts are linked to the proposed student enrollment increase, an operational buildout year of 2012 would result if the alternative construction schedule is implemented.*

[105] *Refer to Appendix L, Traffic Impact Study for Proposed Buckley School Campus Enhancement Plan, prepared by Crain & Associates, March 2006, as amended in Section II, Corrections and Additions, of this Final EIR for an analysis of typical queuing demand.*

COMMENT NO. 7-3

3. The quality of life in the neighborhood will suffer because of the anticipated seven years of construction required for the expansion to be completed.

RESPONSE NO. 7-3

This comment refers to a previous site plan which included a larger construction timeframe and which differs from the currently proposed project. This previous plan has since been evaluated as Alternative E to the project in Section V, Alternatives, Subsection E, Previous Project Alternative, of the Draft EIR. Under the currently proposed project, construction would occur over the course of approximately five years, spread out over an approximate six and a half year timeframe.[106] Please refer to Response to Comment No. 5-9 regarding the proposed construction timeframe and associated mitigation measures. Please also refer to Response to Comment No. 5-1 regarding the compatibility of the project in terms of land use, design, and School operations, with the surrounding neighborhood.

Regarding quality of life issues, CEQA Guidelines Section 15131(a) states that social effects shall not be considered as significant impacts on the environment, except insofar as they may cause physical changes to the environment related to the project. As such, quality of life issues are beyond the scope of this EIR.

COMMENT NO. 7-4

4. The Buckley school [sic] already conducts several weekend functions, which are disruptive to us and our neighbors. We do not want to be inconvenienced further due to the requests that Buckley is making to their Conditional Use Permit.

RESPONSE NO. 7-4

As discussed in greater detail in Response to Comment No. 5-1 above, the compatibility of the project, in terms of land use, design and School operations, with the surrounding neighborhood is evaluated in Section IV.H, Land Use, of the Draft EIR. Private schools are typically permitted as a conditional use subject to issuance of a CUP in which conditions are specified to ensure compatibility with nearby residential uses. As demonstrated in the EIR analysis, project development would not alter the overall character of the campus or the surrounding neighborhood. While the project would allow for an increase in the number of weekend activities, none of the operational characteristics of the project would result in a

[106] *Refer to Section II, Corrections and Additions, of this Final EIR, for a correction to the duration of construction originally presented in the Draft EIR.*

significant environmental impact; specifically, no operational noise, traffic or parking impacts would occur. Since the commentor does not describe the specific nature of the concern and the Draft EIR concluded that no significant environmental operational impacts would occur, the comment is noted for the record and will be forwarded to the decision-makers for consideration.

COMMENT NO. 7-5

We support improving the quality of education for our community's youth. The Buckley School is a for profit institution. We believe that the benefit that Buckley students will achieve from the school's expansion comes at the expense of the Sherman Oaks residents.

Please consider the Sherman Oaks residents' concerns when making your decisions regarding the Buckley School.

RESPONSE NO. 7-5

This comment does not raise new environmental information specific to the project, but is acknowledged and will be forwarded to the decision-makers for review and consideration. Please refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project. It is noted that The Buckley School is not a for-profit business, but rather a not for profit educational/institutional use.

COMMENT NO. 7-6

I attended a meeting on 12/4 where Buckley's expansion plans were discussed in greater detail. My concerns are shared by every Sherman Oaks resident who attended this meeting:

1. The residents on Stansbury and neighboring streets are imprisoned daily because of the traffic generated by the Buckley School. While Buckley isn't responsible for all the traffic in the area, it certainly contributes to the daily gridlock at Stansbury and Valley Vista. Increasing enrollment, eliminating what offsite parking they currently have, and years of construction required for Buckley to expand will surely worsen a situation that is currently unacceptable.

RESPONSE NO. 7-6

As discussed in Response to Comment No. 5-3, above, with implementation of the proposed mitigation measures, operation of the project with the increase in students would not result in significant impacts at any of the studied intersections, including the intersection of Stansbury Avenue and Valley Vista Boulevard. In addition, based on the revised empirical daily trip generation rate described above in Response to Comment Nos. 5-3 and 5-4, the project

would not significantly impact the residential street segment of Stansbury Avenue north or south of Valley Vista Boulevard (see Section II, Corrections and Additions, for additional discussion). Furthermore, although not required as mitigation, the School has volunteered to reduce the project daily generation of 278 vehicle trips by at least 40 percent (i.e., a reduction of at least 111 trips). The Applicant also volunteers to reduce existing School-related trip generation by five percent during the A.M. peak hour, as well as the School P.M. peak hour as part of the TDM Plan.[107] In addition, as discussed in the Draft EIR and summarized in Response to Comment No. 7-2, an arrival plaza would be developed in conjunction with the proposed parking facility to provide sufficient on-site queuing for student pick-up/drop-off, thus eliminating vehicular queuing from the school along Stansbury Avenue.

In addition, it was determined that short-term and intermittent significant impacts due to construction-related traffic would occur on Stansbury Avenue south of Valley Vista Boulevard. No feasible physical measures are available to mitigate the construction traffic impacts. The only option would be to reduce the amount of daily construction traffic generated, which would extend the construction time frame so that many fewer workers and construction vehicles are involved at any given time. However, such a measure would be greatly inefficient, more costly, and more disruptive over the long term to School operations, student activities and the surrounding residential neighborhood. In addition, as outlined on page 375 of the Draft EIR, the School will implement Mitigation Measures J-1 through J-3 during construction to minimize construction-related traffic impacts and to address neighborhood concerns.

COMMENT NO. 7-7

2 Excessive noise and dirt levels expected for the next 7 years due to required construction that may legally begin at 6:30 AM six days a week.

RESPONSE NO. 7-7

As discussed in Response to Comment 7-3 above, the three general phases of construction would occur over the course of approximately five years, spread out over an approximate six and a half year timeframe.[108] Construction would not occur continuously for a seven-year duration as indicated by the comment. In addition, construction noise would be limited to between the hours of 7:00 A.M. and 5:00 P.M. on weekdays during most construction phases and 8:00 A.M. to 5:00 P.M. on Saturdays. During Phase 2, construction noise would be limited to between the hours of 7:00 A.M. and 5:00 P.M. on weekdays during the regular school

[107] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the TDM Plan.*

[108] *Refer to Section II, Corrections and Additions, of this Final EIR for a correction to the duration of construction originally presented in the Draft EIR.*

year; 7:00 A.M. and 7:00 P.M. on weekdays during the summer months; and 8:00 A.M. to 5:00 P.M. on Saturdays, which is more restrictive than the requirements of the City's Noise Ordinance (refer to Response to Comment No. 5-6 for further discussion).[109] Thus, construction would not begin at 6:30 A.M. on any day of the week, as indicated by the comment. As discussed above, based on community input, the project currently proposed reflects a reduction in grading and export and also represents a reduction in the duration of construction when compared with the plan previously proposed for the project site. Refer to Section IV.I, Noise, and Section IV.B, Air Quality, of the Draft EIR as well as revisions provided in Section II, Corrections and Additions of this Final EIR for detailed analyses regarding noise and air quality during construction.

COMMENT NO. 7-8

3. The approximately 20 foot building height variance Buckley is requesting to build a FIVE STORY building in our RESIDENTIAL neighborhood. By the way, Sherman Oaks residents represent only 20% of Buckley's student enrollment.

RESPONSE NO. 7-8

As discussed in Response to Comment No. 5-5 above, two of the proposed buildings would exceed the currently permitted maximum height for the project site. The proposed 55-foot height maximum for the four level Middle and Upper School Main Academic Center and associated changes in the surrounding finished grade would be necessary to accommodate the project's excavated soils on-site, which would serve to nearly eliminate the need for soil export or import. In addition, it is noted that the Middle and Upper School Main Academic Center would visually appear as 31.1 to 43.6 feet in height from most vantage points due to the sloping nature of the site's natural topography as well as the grade changes proposed in this area of the campus. Additionally, no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.

Per School records, student enrollment for the current 2006–2007 school year includes 131 students who live in Sherman Oaks, or approximately 17.5 percent of the student body. These students represent an estimated 20 percent of student households (some students are associated with two households in Sherman Oaks due to divorced families). By virtue of being a private, not for profit educational/institutional use, The Buckley School is not limited to a student body from the immediately surrounding community (as are most public schools), but rather accepts students from throughout the City and region, including Sherman Oaks.

[109] *Once a building is fully enclosed, interior construction activities may continue until the hours permitted by the City. Refer to Section II, Corrections and Additions, of this Final EIR for clarification regarding the construction hours originally presented in the Draft EIR.*

COMMENT NO. 7-9

4. Buckley currently holds two events that restricts parking in front of our homes. Buckley wants to increase the number of evening and weekend events to as many as 24.

RESPONSE NO. 7-9

Currently, the two largest events (the Annual Fair and Commencement activities) held at the School result in the posting of "No Parking" signs on neighborhood streets, and local residents are informed by mail that the restrictions do not apply to them and their guests. As stated on page 374 of the Draft EIR, the School has proposed to maintain this parking restriction for the Annual Fair and Commencement events, which will continue to be the only two events that require off-site parking. These parking restrictions would prohibit general public parking on the posted streets, except for area residents and their guests. It is not anticipated that other School events, including those occurring on weekends, would require off-site parking. Therefore, the project's on-site parking supply, together with off-site parking for these two events, would be sufficient to meet parking demand, and parking impacts would be less than significant.

COMMENT NO. 7-10

5. SAFETY. Buckley has consistently refused to address the potential problem of emergency evacuation. In case of earthquake or fire, residents on Stansbury, Camino de la Cumbre, et al, are at risk because access out is limited to only three streets and two of them have only one lane.

RESPONSE NO. 7-10

Emergency access to the School would continue to be provided via Stansbury Avenue and Camino de la Cumbre. The City of Los Angeles Fire Department has determined that adequate emergency access to the site is available.[110] In addition, emergency access within the site would be provided through the central portion of the site via the project's proposed pedestrian walkway, which would be maintained as an access route for the Fire Department per City standards. In the event that evacuation of the entire campus is required, emergency evacuation procedures would be undertaken by the School. Specifically, School faculty and staff would escort students on foot to the off-campus evacuation site at Van Nuys-Sherman Oaks Park on Huston Street.[111] An alternate evacuation area has also been designated at the surface parking

[110] *Project plans and an associated LAFD permit application were signed, stamped and approved by Joseph Johnson, Inspector, Los Angeles Fire Department, on February 27, 2007.*

[111] *The designation of Van Nuys-Sherman Oaks Park as the primary off-site evacuation site was determined in conjunction with LAFD.*

lot on Hazeltine and Ventura Boulevard. As a part of these procedures, only emergency vehicles would be allowed on/off campus and parents would pick up their students at the off-campus evacuation site. Under these circumstances a disaster situation broadcast system would be used to notify parents of evacuation procedures. Specifically, the School contracts with an out-of-state emergency broadcast system that if activated sends out a message about evacuation details and the designated off-site meeting location. To initiate this system, phone contact is made by the School (by cell phone or a land line with battery back up power) to record an emergency message, then the message is sent by the provider to all home, work, and cell phone numbers listed with the School for parents, faculty, and staff. As discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the School's emergency evacuation plan would be subject to LAFD review and approval, and the plan shall be included in the Department of City Planning file for the project and distributed to the City Council Office, the local homeowners' associations, and to a list of neighbors mutually agreed upon with the Sherman Oaks Homeowners Association (SOHA), including all homes on Stansbury Avenue south of Ventura Boulevard.

The LAFD has indicated that evacuation may not always be optimal depending on the nature of an emergency. Under certain circumstances "secure in place" methods may be implemented such that students, faculty and administrators are kept on the campus in a secure location. Under this scenario the School's emergency broadcast system would be activated to notify families and communicate appropriate action. Further, in other emergency instances the School may be asked to provide shelter for the community.

COMMENT NO. 7-11

6. Buckley has earned the reputation for not honoring its Conditional Use Permit. Residents have no reason to believe that they will honor the new one being requested.

RESPONSE NO. 7-11

This comment does not raise specific environmental information related to the project, but is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 7-12

My husband and I and all the other Sherman Oaks residents who attended Monday's meeting, support improving the quality of education for our community's youth. Although Buckley is a non-profit institution, it can not be ignored that it is first, and foremost, a BUSINESS. Buckley's growth comes at the expense of its neighbors, the Sherman Oaks residents.

Please consider our concerns when making your decisions regarding the Buckley School.

RESPONSE NO. 7-12

This comment does not raise specific environmental information related to the project, but is acknowledged and will be forwarded to the decision-makers for review and consideration. To clarify, the Buckley School is not a commercial business, but rather a not for profit educational/institutional use. Educational uses are permitted on-site by the CUP pursuant to the City's Zoning Code.

LETTER NO. 8

Kenneth R. Ballard, Esq.
14090 Roblar Road
Sherman Oaks, CA 91423

COMMENT NO. 8-1

As a resident of Sherman Oaks, residing just .5 mile north of The Buckley School just off of Stansbury Avenue, I would like to add my support to The Buckley School's proposed Campus Enhancement Plan.

The Buckley School is a valuable asset to our community offering excellent education. I do not have children at The Buckley School; however I support schools. It is in the interest of good city planning to maintain schools in residential neighborhoods as well as allowing modernization and expansion. The School's request to add 80 students is reasonable given the growth of Sherman Oaks and the need for educational facilities.

Although there will be some short-term inconvenience to the neighbors during construction, I believe the long-term benefit will be much greater: The Buckley School has been part of the community for over 40 years and should be allowed to update.

We support Buckley's plan and goal to maintain its status as an outstanding school and as an important part of Sherman Oaks.

RESPONSE NO. 8-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 9

Jennifer Berman
4184 Stansbury Avenue
Sherman Oaks, CA 91423
jenniferberman@xlxrx.com

COMMENT NO. 9-1

I attended a community meeting last night in regards to the expansion of the Buckley School. I stated that many people understood that the Buckley School needed to modernize buildings, the neighborhoods concern was over the large scope of the project, and the need to improve existing traffic conditions (traffic is already bad, and their construction would increase traffic by 20%). I said that surely they must have some compromises in place. The attorney's representing the Buckley School then stated that there were no compromises.

Based on that stance, I object strongly to the expansion of the Buckley School.

RESPONSE NO. 9-1

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The commentor is referred specifically to Section IV.J, Transportation and Circulation, of the Draft EIR, as well as Section II, Corrections and Additions, of this Final EIR, for a thorough discussion of traffic. Please also refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project.

A construction traffic impact analysis was conducted for 17 study segments in the residential neighborhoods proximate to the site. The analysis was prepared for weekday and Saturday conditions during each month of construction activity. Construction-related traffic would significantly impact only one of these segments, Stansbury Avenue south of Valley Vista Boulevard. At most, construction-related trips would increase future daily traffic volumes on this street segment by approximately 14.7 percent, which would be during Phase 3B of construction.

LETTER NO. 10

Geoff Case
3852 Camino de Solana
Sherman Oaks, CA 91423

COMMENT NO. 10-1

I am writing to you to express my strong opposition to the current Buckley School plan for expansion as described in their Draft EIR submittal, CASE# [sic] ENV-2004-7171-EIR. I wish to have you consider two points.

RESPONSE NO. 10-1

This comment does not raise specific information related to the project, but is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 10-2

The size and scope of the proposed new work is completely out of scale with the surroundings and will have a long lasting and very negative effect on the surrounding community. Conditional Use Permits applications by definition should reflect some compatibility with the surrounding community. Page 256 of the report, Section H, Land use, states that the "environmental setting" consists of “low density, single family residential uses” and the "undeveloped Fossil Ridge Park". Into this setting the applicant is asking to construct two large new buildings in excess of 55 feet in height. The current zoning code for RE-40 limits the height of any building to 36 feet. What is the justification for this request to get permission to build 19 to 20 feet over the height limit? There is none. The school as currently configured consists of low slung, primarily single story structures which are in fact compatible with the surrounding community, and it should remain so. The request to expand so massively is driven be [sic] the school's request to add 80 new students plus additional support staff and 100 additional parking spaces. This request should be denied or scaled down significantly. Others have commented to you I’m sure about the extremely negative traffic ramifications of this proposed increase in student and staff population.

RESPONSE NO. 10-2

As discussed in Section II, Project Description, of the Draft EIR, and summarized in Response to Comment 5-1, above, the additional square footage proposed would allow the School to update many of its existing aging and inadequate facilities. In addition, as discussed in Section IV.H, Land Use, of the Draft EIR, the existing Buckley School campus has been developed for use as a private school since the late 1960s. Educational uses have therefore been

part of the land use relationships within the local residential area for over two generations. As demonstrated in the EIR analysis, project development would not alter the overall character of the campus or the surrounding neighborhood. While the project would allow for an increase in floor area and a modest increase in the number of students, none of the operational characteristics of the project would result in a significant environmental impact. Despite an increase in the intensity of development on-site, the overall massing and scale of the site would be similar to existing conditions due to project sensitivity relative to building siting, building heights that are generally consistent with existing building heights, and the use of an enclosed parking facility. Additionally, the project includes a TDM plan to minimize vehicle trips to the site (discussed in Section IV.J, Transportation and Circulation, of the Draft EIR, and amended in Section II, Corrections and Additions, of this Final EIR). Although not required as mitigation, to further reduce impacts the Applicant volunteers to reduce the project daily generation of 278 vehicle trips by at least 40 percent (i.e., a reduction of at least 111 trips). The Applicant also volunteers to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan.[112] Furthermore, the operational impacts of the project on traffic conditions would be less than significant with implementation of the traffic mitigation measures.

As discussed in Response to Comment No. 5-5 above, two of the proposed buildings would exceed the permitted maximum height for the project site. The proposed 55-foot height maximum for the Middle and Upper School Main Academic Center and associated changes in the surrounding finished grade would be necessary to accommodate the project's excavated soils on-site, which would serve to nearly eliminate the need for soil export or import. The design of this building reflects major changes to the project that were implemented in response to community concerns regarding the amount of soil materials requiring export from the site. While the height of the Main Academic Center could be reduced by lowering the building and the surrounding grade, such a change in design would necessitate substantially more excavation and ultimately increased soil export from the campus (refer to Comment No. 5-5 for further discussion). In addition, it is noted that the Middle and Upper School Main Academic Center would visually appear as 31.1 to 43.6 feet in height from most vantage points due to the sloping nature of the site's natural topography as well as the grade changes proposed in this area of the campus. Furthermore, no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.

The proposed building heights referenced throughout this document each include a two-foot mansard roof and thus reflect the highest point of the roof, per LAMC §12.03. LAMC §12.03 defines building height as "the vertical distance above grade measured to the highest point of the roof, structure, or the parapet wall, whichever is highest. Retaining walls shall not

[112] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the TDM Plan.*

be used for the purpose of raising the effective elevation of the finished grade for purposes of measuring the height of a building or structure." Also per LAMC §12.03, grade or adjacent ground level is defined as "the lowest point of elevation of the finished surface of the ground, paving or sidewalk within the area between the building and the property line, or when the property line is more than 5 feet from the building, between the building and a line 5 feet from the building." On each of the proposed buildings, rooftop mechanical equipment will extend approximately seven feet above the high point of the roofline. Such rooftop equipment would not count towards building height, per LAMC §12.21.1 B 3.

COMMENT NO. 10-3

The second serious concern I have relates to the discussion on pages 35 through 38, Item #9, Noise. The report states that "construction period noise impacts would be temporary, SIGNIFICANT, and unavoidable". The canyon in which the school site acts like a giant sound amplifier. From where our home sits on Camino de la Cumbre we can easily hear sounds from blocks away. The fact that heavy construction will be continuing on the campus 6 days a week for 5 or 6 years is a serious problem. I ask that whatever is ultimately approved have the most restrictive sound control requirements attached to the approval and, more critically, that the school be required to condense it's overall calendar of development to 24 months. I think that is all this community can be reasonably asked to accommodate.

RESPONSE NO. 10-3

The construction noise analysis assumes a worst case analysis, that is, the maximum amount of equipment located on-site would be operating simultaneously along the property line closest to sensitive receptors. Under real world conditions, this scenario would not take place on a daily basis. Maximum construction noise levels would occur during the preparatory work (e.g., site grading) and finishing work (e.g., paving operations and the application of architectural coatings such as paints and other building materials), which would last several months during each phase. During the preparatory and finishing work, all equipment is not expected to be operating simultaneously on a daily basis. While mitigation measures have been provided in the Draft EIR to reduce noise impacts to sensitive receptors, noise impacts during construction would continue to exceed the 5 dBA significance criterion at multiple receptor locations intermittently during all major project construction phases (i.e., Phases 1, 2 and 3). In addition, the possibility of canyon noise effects was addressed in Section IV.I, Noise, of the Draft EIR. Results of the analysis show a maximum noise increase of 2 dBA as a result of noise reflection from the canyon.

Reducing the construction duration to 24 months would not be feasible due to the increased intensity of activity, equipment and personnel that would be required to be on-site on a given day and the ability to continually operate the school. In addition, this increased construction intensity would increase noise levels on worst case days.

COMMENT NO. 10-4

Keep in mind that less than one in five Buckley students comes from the surrounding community so this level of intrusion does not pay off for the community at large to any significant degree, but primarily inflicts hardship on the neighborhood.

Thank you very much for your consideration to this matter.

RESPONSE NO. 10-4

This comment does not raise new environmental information relevant to the Draft EIR, but is acknowledged and will be forwarded to the decision-makers for review and consideration. As discussed in Response to Comment No. 5-1, the proposed project improvements are intended to address the needs of existing and future school programs, including the provision of adequate teaching space for all educational levels, specialty teaching spaces, and multipurpose spaces for educational gatherings that cannot occur in a standard classroom. The project also provides for the modernization of existing facilities, improved disabled access, and energy efficiency upgrades. As discussed in Response to Comment No. 7-2, above, included within the project are increased parking and vehicular circulation and queuing improvements, which would directly benefit the surrounding neighborhood. Additionally, the School has volunteered a condition of approval allowing for public use of the campus (except for the swimming pool) by neighbors located within the boundaries of the Sherman Oaks area, which would benefit the surrounding community. It is noted that since the EIR concludes that significant unavoidable impacts would occur, the decision-makers will be required to adopt a statement of overriding considerations in accordance with CEQA in order to approve the project.

LETTER NO. 11

Barbara Case
bdourmash@aol.com

COMMENT NO. 11-1

I have attached a document which I have previously sent to you but which now reflects my serious concerns related to the most current Buckley expansion proposal. It covers a wide range of very serious concerns which many of us in the neighborhood have. Among those concerns are the size and height of the proposed expansion, the seriously negative noise and traffic impact, and many other issues. I would very much appreciate your review of the attached document as you consider the proposed massive expansion of the school.

Thank you for your consideration of this matter.

RESPONSE NO. 11-1

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Each of the environmental issues mentioned in the comment have been addressed in the Draft EIR and supporting appendices. The commentor is referred specifically to the Sections IV.A, Aesthetics; IV.H, Land Use; IV.I, Noise; and IV.J, Transportation and Circulation, of the Draft EIR, for a thorough discussion of each of these issues, as well as to Section II, Corrections and Additions, of this Final EIR, for additional discussion and analysis. Please also refer to the responses provided in Letter No. 12 for more specific discussions regarding the concerns expressed by the commentor.

LETTER NO. 12 (Sent as an Attachment to Letter No. 11)

Concerned Neighbors of Buckley
Sherman Oaks Homeowners Association
Buckley School Executive Committee

Barbara Case
Geoffrey Case
Sent as an Attachment to Letter No. 11

COMMENT NO. 12-1

This letter contains notice of Sherman Oaks Homeowners Association's Buckley School Committee's objections to the proposed expansion of the Buckley School Campus for the reasons set forth below.

Sherman Oaks Homeowners Association is organized pursuant to the general nonprofit corporation law of the State of California. Its' specific purposes are to preserve and protect its members and the Sherman Oaks community's quality of life.

We request that the Environmental Review Section of the Department of City Planning include the environmental issues that are outlined in this letter in their Environmental Impact Report of the proposed Buckley School expansion.

Section 1. Outline of Checklist

A summary of the Environmental Land issues presented in this letter that demand review include, but are not limited to, the following:

1. Land Use Consistency

2. Traffic Impact-on Neighboring Street and Greater Sherman Oaks

3. Visual Resources/Aesthetics/Size of Construction /Views /Night Time Illumination

4. Grading of Hillsides adjacent to Single-Family Homes

5. Noise (During Construction and After)

6. Drainage of the Canyon Surrounding Buckley and Hydrology (Excavation in near proximity to sub-surface water streams.)

7. On sight Oak Tree Removal

8. Building height-view from adjoining single-family homes, Danger of rezoning Buckley to be outside of the Mulholland Corridor.

9. Air Pollution from proposed 1000,000 + SF semi-subterranean Parking structure.

10. Hazards & Hazardous Materials/Emission of Friable Asbestos During Demolition

11. Building Contiguous to Fossil Ridge Park

12. Paleontological Resources/Excavation/Grading in General and adjacent to Fossil Ridge State Park

13. Geology and soils

14. Effect on Wildlife

15. Fire and Earthquake Evacuation

16. Unsafe Second Egress

17. Life Safety

18. Haul-Route (Export of 51,000+ Cubic yards of Dirt)

19. Quality of Life

20. Buckley's Violation of its' [sic] current Conditional Use Permit

RESPONSE NO. 12-1

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The environmental issues set forth in items 1 through 18 of this comment have been addressed in the Draft EIR and supporting appendices. Each of these issues are also discussed in more detail below

Regarding quality of life issues, CEQA Guidelines Section 15131(a) states that social effects shall not be considered as significant impacts on the environment, except insofar as they may cause physical changes to the environment related to the project. As such, quality of life issues are beyond the scope of this EIR. Additionally, the comment related to compliance with the School's current CUP conditions does not raise specific environmental information related to the project, but is acknowledged and will be forwarded to the decision-makers for review and consideration

COMMENT NO. 12-2

Section 2. Specifics of Issues

1. LAND USE CONSISTENCY:

According to the General plan and the Mulholland Scenic Parkway Specific Plan, the proposed Buckley School ("Buckley") expansion conflicts with the General Plan Zoning and Plan Designation as established by the City of Los Angeles. The Buckley proposal also conflicts with applicable environmental plans or policies adopted by agencies with jurisdiction over its' site.

Simply put, Buckley School should not be granted any exceptions to this Specific Plan or any discretionary zone changes. A zone change would result in buildings that would detract from the existing style or image of the area due to an increase in density, height, bulk, and signage (See item #3, Aesthetics, for specifics). Moreover, it would create a dangerous precedent by enabling other projects to receive exceptions to this vital Specific Plan and zone changes along the Mulholland Scenic Parkway.

RESPONSE NO. 12-2

This comment refers to a previous site plan which differs from the currently proposed project and has since been included in the Draft EIR and analyzed as Alternative E to the project. A discussion of that alternative is provided in Section V, Alternatives, Subsection E, Previous Project Alternative, of the Draft EIR. The proposed project no longer involves a change to the General Plan land use designation for the site, nor a Zone Change. While a number of discretionary actions (listed in Section II, Project Description, of the Draft EIR and amended in Section II, Corrections and Additions, of this Final EIR) are requested as part of the project approval, including Specific Plan Exceptions to allow the proposed expansion and operation of school facilities and to allow one new building to exceed the maximum 40-foot height limit allowed within the MSPSP Outer Corridor, with such approvals, the project would be considered consistent with applicable land use regulations. The land use analysis within the Draft EIR concludes that the project would otherwise be generally consistent with applicable land use polices and the land use designations and zoning for the project site. A detailed analysis of land

use consistency is provided in Section IV.H, Land Use. It is noted that the granting of a Specific Plan Exception, which is permitted pursuant to LAMC §11.5.7F and MSPSP Section 3C, would not inherently cause the project to detract from the existing style or image of the surrounding area. As demonstrated throughout the land use and aesthetics analyses in the EIR, the project has been designed such that new structures would be integrated into the existing topography of the site in areas that are generally already paved, landscaped, or developed with buildings, thus promoting the compatibility of new development with the scenic character of the community. Moreover, following project implementation the floor area ratio of the campus, at approximately 0.21:1, would be substantially less than the 3:1 permitted FAR. Please refer to Response to Comment No. 5-1 for further discussion of the compatibility of the project with the surrounding neighborhood. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 12-3

2. TRAFFIC IMPACT - NEIGHBORING STREETS AND SHERMAN OAKS:

The Sherman Oaks community is currently experiencing a series of major real estate developments each anticipated to contribute a significant share to pre-existing traffic, gridlock, noise, and congestion problems.

We view these projects, including the proposed Buckley School expansion as challenging the right to enjoy a decent quality of life -for our residents and businesses

Regrettably, this is due, to the City of Los Angeles' continuing failure to safeguard Sherman Oaks from the increase, in traffic and congestion.

Therefore, we no longer can view each project separately, i.e., as not having a cumulative impact on the region, when, in fact, the opposite is true.

Although the Buckley School Expansion, with issues particular to its unique physical location, must be considered - so should the cumulative development within the rest of the community.

A Neighborhood Intrusion Impacts

Buckley School is literally just blocks south of the following areas in development including a Best Buy "big box " [sic] store (Van Nuys and Milbank); Camino Real (182 Unit with ground floor retail) along with possible concurrent development of vacant land behind Jiffy Lube - both are located between Hazeltine and Calhoun Avenues, on/off Ventura Boulevard; planned

condominium development (98 units) at Sylmar and Moorpark) and approximately 600 residential units/mixed-use developments planned near Sepulveda and Ventura Boulevards.

Buckley School is situated at the southernmost end of Stansbury Avenue between two major access routes to and from, the San Fernando Valley - Beverly Glen Canyon and Coldwater Canyon. It is safe to assume that the expansion will contribute greatly to the traffic and gridlock in this already problematic area.

RESPONSE NO. 12-3

A detailed analysis of cumulative impacts associated with the project together with development of related projects is provided for each of the environmental issues addressed in the Draft EIR. The five related projects cited by the commentor, as well as 24 other related projects, were analyzed in the Draft EIR, including within the traffic study. The analysis of future (2014) traffic conditions, including traffic generated by the 29 related projects, determined that the project would have significant impacts at the intersections of Ventura Boulevard and Beverly Glen Boulevard/Tyrone Avenue, Valley Vista Boulevard (south) and Beverly Glen Boulevard, and Valley Vista Boulevard and Stansbury Avenue.[113] However, as discussed in Section II, Corrections and Additions (Subsection G), of this Final EIR, the project's impact on the residential street segment of Stansbury Avenue south of Valley Vista Boulevard would no longer be significant. (Refer to Response to Comment Nos. 5-3 and 5-4 for discussion of associated revisions to the project's trip generation rate.) With implementation of Mitigation Measure J-4, as revised within this Final EIR, and Mitigation Measures J-5 and J-6, the project traffic impacts would be mitigated to a less than significant level.

It is assumed that the commentor's reference to Beverly Glen Canyon is intended to mean Beverly Glen Boulevard. The intersections of Ventura Boulevard and Beverly Glen Boulevard/Tyrone Avenue, Valley Vista Boulevard/Roblar Place and Beverly Glen Boulevard, and Valley Vista Boulevard (south) and Beverly Glen Boulevard were all included as study intersections. Traffic impacts attributable to the project at these locations were identified, as shown in Table IV.J-7 of the Draft EIR. As previously mentioned, Mitigation Measure J-4, as revised within this Final EIR, and Mitigation Measures J-5 and J-6 would reduce impacts at these intersections to a less than significant level.

[113] *Also refer to Section II, Corrections and Additions, of this Final EIR for discussion of any operational impacts associated with a project buildout year of 2012; since the project's potential operational impacts are linked to the proposed student enrollment increase, an operational buildout year of 2012 would result if the alternative construction schedule is implemented.*

COMMENT NO. 12-4

Further, there [sic] specific traffic issues impacting the residential street leading up to the Buckley School, Stansbury Avenue.

1. The continual impact during rush hour from traffic on Beverly Glen created by the large number of trips by Buckley parents dropping off and picking up their children, who reside on the West side of Los Angeles.

2. The congestion on Ventura Blvd created by vehicles cars making left turns on to Stansbury in order to travel to Buckley School or take a short-cut to Beverly Glen Boulevard.

RESPONSE NO. 12-4

As discussed on page 348 of the Draft EIR, a residential street impact analysis was conducted to evaluate the potential impacts of project traffic on residential streets near the project site. Stansbury Avenue north of Valley Vista Boulevard and Stansbury Avenue south of Valley Vista Boulevard were included as study residential street segments. However, as discussed in Section II, Corrections and Additions (Subsection G), of this Final EIR, project traffic is not expected to significantly impact any of the eight residential street segments, including Stansbury Avenue south of Valley Vista, the segment which directly accesses the School's main entrance.. (Also refer to Response to Comment Nos. 5-3 and 5-4 for discussion of associated revisions to the project's trip generation rate.) Nevertheless, the School will implement an enhanced Transportation Demand Management (TDM) Plan to reduce daily project traffic on the surrounding residential street segments, including on Stansbury Avenue south of Valley Vista Boulevard.[114] In addition, the new arrival plaza and enclosed parking facility, together with the drop-off/pick-up queuing plan, would ensure that vehicular queuing and on-street parking attributable to the School do not occur on Stansbury Avenue and other residential streets in the neighborhood. Please refer to Response to Comment No. 12-3 regarding impacts on Beverly Glen Boulevard. It is noted that vehicles traveling west on Ventura Boulevard that turn left on Stansbury Avenue in order to cut over to Beverly Glen Boulevard for access to the south typically consist of local commuters, not Buckley students and their families who instead continue directly south on Stansbury Avenue to the Buckley campus. Further, vehicles traveling on local streets after school instruction has begun each morning generally consist of commuters and other local residents.

As shown in Table IV.J-7 of the Draft EIR, project traffic is expected to significantly impact the intersection of Ventura Boulevard and Stansbury Avenue during the A.M. and School

[114] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the TDM Plan.*

P.M. peak hours, prior to the implementation of mitigation measures. However, implementation of Mitigation Measure J-5 would adequately reduce this impact to a less than significant level. As demonstrated by the Traffic Study, with implementation of mitigation measures, no significant impacts would result from operation of the project at any of the analyzed intersections.

COMMENT NO. 12-5

B. Street intersection and street section capacity

According to Department of Transportation vehicular counts conducted during consideration of Buckley's CUP revocation proceedings in 1987, DOT concluded that Buckley added "substantial traffic volumes on Stansbury Avenue and Valley Vista and local streets which traverse residential neighborhoods … approximately 1,500 trips per day are added to City streets by the school's operations." Accordingly, new traffic surveys and counts must be conducted by DOT and appropriate mitigations be placed on Buckley School.

RESPONSE NO. 12-5

New traffic counts were conducted for the project in October 2004. These counts were updated by a two percent annual growth rate to conservatively reflect year 2006 conditions, as approved by LADOT. In addition, appropriate mitigation measures have been proposed and are included on page 377 of the Draft EIR, as amended within this Final EIR. Please refer to Response to Comment Nos. 7-2, 12-3, and 12-4 regarding the traffic analysis and project mitigation. Also refer to Section II, Corrections and Additions (Subsection G), of this Final EIR for an updated discussion of the traffic trip counts.

COMMENT NO. 12-6

C. Construction impacts on Traffic

Any expansion by the school would only compound the existing traffic and congestion as construction is anticipated to take up to ten years. Accordingly, Buckley must be required to mitigate this impact.

RESPONSE NO. 12-6

The commentor incorrectly states that construction is anticipated to take up to ten years. As discussed in Section II, Project Description of the Draft EIR, construction for the project

would be completed in three phases totaling approximately five years.[115] In order to keep the School in operation during construction, the three phases would be spread out over an approximate six and a half year timeframe.

As described on page 358 of the Draft EIR, a comprehensive analysis of project construction traffic was conducted. It was determined that short-term and intermittent significant impacts due to construction-related traffic would occur on Stansbury Avenue south of Valley Vista Boulevard. No feasible physical measures are available to mitigate the construction traffic impacts. The only alternative would be to reduce the amount of daily construction traffic generated, which would extend the construction time frame so that many fewer workers and construction vehicles are involved at any given time. However, such a measure would be greatly inefficient, more costly, and more disruptive over the long term to School operations, student activities and the surrounding residential neighborhood. As outlined on page 375 of the Draft EIR, the School will implement Mitigation Measures J-1 through J-3 during construction to minimize construction-related traffic impacts and to address neighborhood concerns.

COMMENT NO. 12-7

D. Parking

The additional parking spaces that Buckley is creating will insure that more cars will be able to enter the campus and park, thus creating more traffic in the neighborhood.

RESPONSE NO. 12-7

As LADOT requires that parking be provided either on-site or within 750 feet of a site, The Buckley School is required to provide project parking on-campus in the absence of an off-site covenant for parking within 750 feet or a variance to allow more distant parking. Furthermore, no off-site parking lots exist within 750 feet of the School. Per Mitigation Measure J-4, as revised within this Final EIR, the School will implement a TDM Plan that is expected to achieve a reduction of at least 75 project trips during the A.M. peak hour, resulting in no increase to the existing A.M. peak-hour trip generation level, and a reduction of at least 4 project trips during the School P.M. peak hour. In addition, although not required as mitigation, the School has volunteered to reduce the project daily generation of 278 vehicle trips by at least 40 percent (i.e., a reduction of at least 111 trips). Of this voluntary daily reduction, at least 75 trips would occur during the School A.M. peak hour due to the required reduction, and the remaining reduction of 36 trips (i.e., 111 – 75 = 36) may be achieved during any time of the School day. Although not required as mitigation, to further reduce impacts the Applicant also volunteers to

[115] *Refer to Section II, Corrections and Additions, of this Final EIR for a correction to the duration of construction originally presented in the Draft EIR.*

reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan.[116] Based on a voluntary five percent reduction in existing peak hour trip levels, the reduction of 75 project-related trips during the A.M. peak hour would serve to maintain the School's future A.M. peak-hour trip generation of 667 trips while the future School P.M. peak hour trips generation would be maintained at 421 trips.

COMMENT NO. 12-8

E. Project Access/Neighborhood intrusion impacts

Finding #8 of City Plan Case no. 17967 stated: "A Traffic and Parking Management Plan is needed to provide for the long term, orderly movement of people and goods to the school site. This will reinforce the viable function of the school and reduce the environmental impacts on residential neighborhoods."

Buckley's new expansion plan does not make provision for an orderly movement of people and goods to the school site.

While there should be many components to such a plan, it is important to consider at this time that the main connecting street, Stansbury is a narrow cul de sac street, located south and intersecting with Ventura Boulevard and Valley Vista.

Since the creation of the school in l965, Stansbury residents have been unable to enter and exit their homes before and after school hours. Thus is due to the fact that parents are queuing in lines that that block Stansbury and its' residential driveways. Further, Stansbury is not wide enough for a third lane. This, obviously, creates a safety hazard for the residents, the vehicles in line and the school, in case of an emergency requiring evacuation of the school and/or the neighborhood.

The only other street accessible to the campus is Camino de la Cumbre, which is a substandard street located just one block west of Stansbury Avenue. It is currently used as the back entrance to the school. The street is very narrow and windy with blind curves that are hazardous to pedestrian and vehicular traffic. Presently, the school uses Camino de Cumbre for access on weekends and evenings when its' front gate is closed.

[116] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the TDM Plan.*

Another issue regarding Camino de la Cumbre is that Buckley parents use it as a shortcut route from the West side of Los Angeles. (40 % of Buckley students are from the Westside). This additional traffic creates more congestion on this dangerous substandard road.

Naturally, additional students and expansion of the school will mean more vehicular traffic on Stansbury and Camino de la Cumbre (again, a substandard street). Therefore, Sherman Oaks Homeowners Association respectfully requests that the creation of a neighborhood traffic mitigation plan be required and funded by the Buckley school to improve the following transportation impacts:

A Neighborhood intrusion impacts

B Intersection Capacity/ Street segment capacity

C. Construction Impacts on Traffic

D. Parking

E. Project access

RESPONSE NO. 12-8

Refer to Response to Comment Nos. 12-3 through 12-6, above. Mitigation Measures J-4 and J-8, as revised within this Final EIR, and Mitigation Measures J-5 through J-7, J-9, and J-10 on pages 377 and 378 in Section IV.J, Transportation and Circulation, of the Draft EIR address traffic, access, parking and circulation concerns near the School. In particular, Mitigation Measure J-4, as revised, requires implementation of a Transportation Demand Management Plan that increases the use of carpooling, public transportation, bicycling, and privately operated bus and shuttle services. The TDM Plan shall achieve a reduction of at least 75 project trips during the A.M. peak hour, resulting in no increase to the existing A.M. peak-hour trip generation level, and a reduction of at least 4 project trips during the School P.M. peak hour. In addition, although not required as mitigation, the School has volunteered to reduce the project daily generation of 278 vehicle trips by at least 40 percent (i.e., a reduction of at least 111 trips). To further reduce impacts, the Applicant also volunteers to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan.[117] In addition, the project incorporates features designed to minimize traffic and parking impacts associated with campus operations; refer to Section II, Corrections and Additions, of this

[117] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the TDM Plan.*

Final EIR for a list of such features. With implementation of the proposed mitigation measures, the operational traffic impacts of the project would be reduced to a less than significant level.

However, as discussed above in Response to Comment Nos. 5-9 and 12-6, short-term and intermittent significant impacts due to construction-related traffic would occur on Stansbury Avenue south of Valley Vista Boulevard. Mitigation measures addressing construction-related traffic are also included in the Draft EIR (Mitigation Measures J-1 through J-3, listed on pages 375 and 376). In addition, various construction-related project features are proposed as part of the project, as detailed on pages 355 through 357 of the Draft EIR, and include a Temporary Parking Plan, designation of a construction relations officer, and the preclusion of construction-related vehicles on Camino de la Cumbre, except in cases of emergency.

Please refer to Response to Comment No. 7-2 regarding project improvements to increase queuing capacity on-site and remove vehicular queuing activities from Stansbury Avenue. Stansbury Avenue is a local street south of Valley Vista Boulevard and is 36 feet wide curb-to-curb. This width is consistent with the standard local street roadway width of 36 feet. In addition, Mitigation Measure J-5 would provide for the widening of a portion of Stansbury Avenue just south of Ventura Boulevard in order to accommodate exclusive left- and right-turn lanes. The Los Angeles Fire Department has further indicated that Stansbury Avenue is adequate for emergency access.[118] Please refer to Response to Comment No. 7-10 for further discussion of emergency access.

Camino de la Cumbre is a circuitous, winding, narrow road. Therefore, it is little used by Buckley parents and/or students to access the School. The School recognizes the shortcomings of Camino de la Cumbre and proposes extended use of the Stansbury driveway for access to the campus, and more limited use of Camino de la Cumbre (i.e., for service vehicles, deliveries, some employees, athletic field access, and emergency access). It is noted that during the 2006-2007 school year, an estimated 256 students or approximately 34 percent of the student body is from the Westside communities of Belair, Beverly Hills, Brentwood, Santa Monica, Pacific Palisades, and Westwood. There are a number of non-freeway alternative routes between these communities and The Buckley School that are more likely to be used by students traveling to campus given the conditions along Camino de la Cumbre.

As part of the project, the Buckley School has proposed a Neighborhood Protection Plan and Fund, designed to create a formal mechanism for addressing issues of community concern that may arise during the construction and operation of the School. The Plan may include traffic, landscaping and buffering, as well as other improvements of possible concern to the neighbors and community that may be brought to the attention of the Planning Department, LADOT, the

[118] *Project plans and an associated LAFD permit application were signed, stamped and approved by Joseph Johnson, Inspector, Los Angeles Fire Department, on February 27, 2007.*

applicable Council District Office(s), the School, or a Neighborhood Traffic Plan Committee established as part of the Plan.

COMMENT NO. 12-9

3. VISUAL RESOURCE AESTHETICS/ SIZE OF CONSTRUCTION/VIEWS/ NIGHTIME ILLUMINATION

A. Evaluation of conflicts with Mulholland Scenic Parkway Specific Plan

(Note: all statements below, in quotes and boldface type, are from the Mulholland Scenic Parkway Plan).

The Buckley School project includes a zone change and variance application that is requesting an increase in density, height, and bulk requirements in areas where **"there is a consistent theme, style, or building height"** requirements.

Further, Buckley should not be allowed to expand in an area **"where sensitive development is assured by a specific plan which integrates the transportation, land use and recreation aspects of the scenic parkway to make available to all people spectacular mountain, ocean and city view, and scenic and recreational opportunities."**

The existing Buckley School campus is presently overbuilt, and its' institutional buildings do not fit in with the residential character of the adjacent residential neighborhood (consisting of one and story [sic] homes). Therefore, any increase in new institutional buildings violates the spirit and intent of the Specific Plan, which among other provisions, requires projects to:

l. "To assure the design and placement of buildings and other improvements preserve, compliment and/or enhance view from Mulholland Drive;"

2. "To preserve the existing residential character of areas along and adjoining the right-of-way."

RESPONSE NO. 12-9

The comment above refers to a previous site plan which differs from the currently proposed project and has since been included an analyzed in the Draft EIR as Alternative E to the project. A discussion of that alternative is provided in Section V, Alternatives, Subsection E, Previous Project Alternative, of the Draft EIR. The proposed project no longer involves a change to the General Plan land use designation for the site, nor a Zone Change.

A thorough analysis of project consistency with the Mulholland Scenic Parkway Specific Plan, as well as the MSPSP Design and Preservation Guidelines, is provided in Sections IV.A, Aesthetics, and IV.H, Land Use, of the Draft EIR. As demonstrated, the project would be in accord with MSPSP requirements and environmental protection measures that address prominent ridges, streams, projects located near parklands, oak trees, archaeological and paleontological resources, and grading, and the necessary Environmental Findings may be made. Table IV.H-2 in Section IV.H, Land Use, of the Draft EIR addresses project consistency with the associated Environmental Protection Measures and demonstrates that the required findings can be made by the Director of City Planning. With approval of the requested Specific Plan Exception to allow one new building to exceed the maximum 40-foot height limit allowed within the MSPSP Outer Corridor, the project would also be consistent with MSPSP requirements regarding building heights. Please refer to Response to Comment No. 5-1 for further discussion of the compatibility of the project with the surrounding neighborhood.

Section IV.A, Aesthetics, also evaluates project impacts on views, including views from the Mulholland Drive scenic corridor. Included therein are pre-development photos and post-development visual simulations illustrating the potential change in views. As shown, proposed development would have similar building heights (in terms of rooflines), building scale, and architectural elements as existing structures, and valued views would not be obstructed Furthermore, given the distance of the site from Mulholland Drive, views of the campus would not appear noticeably altered. As such, the project would in fact preserve views from Mulholland Drive as well as the existing residential character of the area, and the project would be consistent with applicable provisions of the MSPSP.

COMMENT NO. 12-10

Nighttime illumination from the campus is intruding and excessive; in fact it illuminates the entire canyon. With the addition of more buildings, the existing problem will be compounded and not in concert with the Specific Plans, which states, in part:

3. "To reduce the visual intrusion cause [sic] by excessive lighting."

Therefore, Buckley should be required to low height, low illumination safety lighting of a color similar to incandescent light, which is shielded and directed onto the Buckley property and not into the residential neighborhood

RESPONSE NO. 12-10

Light impacts associated with the project are addressed in Section IV.A, Aesthetics, of the Draft EIR. As discussed, project-related lighting would generally consist of low-level point light sources, and nighttime exterior lighting would consist primarily of visibility and security

light fixtures for pedestrian and vehicular circulation and parking. Such fixtures would be directed inwards and downward with shielding as appropriate, in order to minimize light spillover. Existing and proposed landscaping on-site would also serve to limit the visibility of campus lighting from off-site. In addition, nighttime lighting for the athletic fields, outdoor play courts, and the Aquatic Center would be prohibited except as required for low-level security and exiting purposes. As proposed, project lighting would be consistent with MSPSP requirements. It is also noted that the pole-mounted, backlit, changeable message sign located near the campus exit, which was a source of nighttime illumination, was removed in July 2006. Removal of the sign was planned as part of the project, but was expedited in response to neighborhood concerns.

COMMENT NO. 12-11

According to the proposed plans, the erection of the new building designated as "Building 14, will be placed on a hill, between the football field and north of the rest of the school;" consequently it will be an "eyesore" and not consistent with the following provision:

4. "construction, building and structure visible from Mulholland Drive not be constructed on the top of a prominent ridge. Buildings and structure visible from Mulholland Drive shall not be constructed with 50 vertical feet of the top of a prominent ridge without prior written approval of the Director pursuant to Section 11."

RESPONSE NO. 12-11

Prominent ridges, as designated in the MSPSP, are illustrated in Figure IV.H-4 in Section IV.H, Land Use, of the Draft EIR. As shown, no prominent ridges are located within the Buckley School campus, and the nearest ridge lies to the southeast within Fossil Ridge Park. The aesthetics and views analysis within Section IV.A, Aesthetics, addresses impacts to prominent ridges, which are protected pursuant to the MSPSP; as evaluated, no proposed structures, including the above-referenced structure (the Aquatic Center), would interrupt prominent ridgelines. As also discussed in Section IV.H, Land Use, project grading also would not affect prominent ridges.

COMMENT NO. 12-12

Buckley's plans are not meeting the following requirements:

5. "Projects Near Parklands. No project shall be erected and no earth shall be graded with 200 feet of the boundaries of any public parkland without the prior written approval of the Director pursuant to Section 11. The Director may approve the construction of a project or grading with 200 feet of public parkland after making the following findings:"

a." The project preserves the residential character along the right-of-way."

b "The project preserves the natural vegetation and the existing ecological balance"

Buckley does not preserve the residential character of the neighborhood arid. Buckley intends to remove Oaks trees, which are protected, by law. At this time, the exact number has not been disclosed. Thus, it should not be allowed to grade with 200 feet of the boundary of Fossil Ridge. It should not be allowed to annex State Park Land to avoid this conflict.

RESPONSE NO. 12-12

Pursuant to MSPSP Sections 6B and 5B, the project would require that certain Environmental Findings be made since grading would occur within 200 feet of parklands, as defined by the MSPSP, and oak trees would be removed. Table IV.H-2 in Section IV.H, Land Use, of the Draft EIR addresses project consistency with the associated Environmental Protection Measures and demonstrates that the required findings can be made by the Director of City Planning. As discussed, the project would enhance the visual character of the campus and be aesthetically compatible with the surrounding residential setting (as further analyzed in Section IV.A, Aesthetics), and since a limited amount of native vegetation exists within the portions of the project site to be affected, impacts to biological resources would be less than significant (refer to Section IV.C, Biological Resources for further discussion).

Regarding oak tree removal, project implementation would necessitate the removal of approximately 80 trees, including 28 native trees (eight coast live oak and 20 southern California black walnut).[119] In accordance with the MSPSP, written approval for oak tree removal would be sought from the City Planning Department. Additionally, in compliance with the City's Protected Tree Ordinance, all regulated trees to be removed would be replaced on at least a two-to-one basis. As such, protected tree removal and replacement would occur at a minimum in accordance with applicable regulations. The proposed project actually includes the planting of over 90 new native trees (of both protected and non-protected varieties), thus exceeding the required two-to-one replacement basis with a ratio of three-to-one new trees, as shown in Figure IV.A-9, Conceptual Landscape Plan, within the Draft EIR.

To clarify, the School does not propose to annex State parkland. As discussed in the land use analysis, the proposed Aquatic Center is planned to be built entirely on the existing Buckley campus. However, as an alternative option, it may be built in the location of the current outdoor basketball and weight facility located at the northeast corner of the athletic field, nestled into the

[119] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the existing tree inventory and project-related tree impacts.*

adjacent hillside and utilizing a portion of land currently owned by the SMMC, subject to future discussions with SMMC.

COMMENT NO. 12-13

6. "Oak trees. No oak tree (quercus agrifolia, lobata, q.virginia) shall be removed, cut down or moved without the removal cutting down or moving an oak tree after making the following findings:)"

a. "The removal, cutting down or moving of an oak tree will not result in undesirable, irreversible oil [sic] erosion through diversion or increased flow of surface water."

It is important to note that erosion and slides are prevalent in the hills surrounding Buckley and Buckley has experience slides on [sic] mud flowing into its property in the last month. In order to remove Oak Trees Buckley is filing to create two new lots so that one can reside in the outer corridor f [sic] the Mulholland Scenic Drive. It should not be allowed to do this for it will damage the scenic character of the zone.

b. "The oak tree is not located with reference to other trees or monuments in such a way as to acquire a distinctive significance at said location."

Lastly, by allowing the removal of any oak trees (or other vegetation and trees) on any hill will remove the only (green) buffer between the school and the neighbor hood [sic].

RESPONSE NO. 12-13

As indicated in Section IV.E, Geology, of the Draft EIR, portions of the project site lie within an area identified by the City of Los Angeles as having a cluster of small shallow surficial landslides. However, the project site itself has had no evidence or record of landslides. Heavy rains in early 2005 caused mudslides above Camino de la Cumbre (immediately west of and upslope from the campus), that crossed the roadway to the fence along the School's property boundary. These slides were a result of erosion caused by surface water runoff from the undeveloped hillside above Camino de la Cumbre, where sheet flows down the slope in an uncontrolled (i.e., unimproved manner).

As discussed in Section IV.A, Aesthetics, project implementation would result in a visually unified campus that harmonizes structures and landscaping with the natural landforms of the canyon. The project includes a landscape plan, illustrated in Figure IV.A-9 on page 108 of the Draft EIR, designed to buffer campus development from the surrounding residences and promote a green campus complementary to the canyon. The landscape plan provides for coast live oak, California sycamore, crape myrtle, sweetgum, toyon, Arbutus 'Marina' and other native

shrubs and vines throughout the campus. As demonstrated in the EIR analysis, impacts on the aesthetic character of the campus and surrounding area as well as on scenic views throughout the canyon would be less than significant. Furthermore, the proposed project would be consistent with standards pertaining to site appearance as implemented through the Mulholland Scenic Parkway Specific Plan, including requirements regarding oak tree removal and ridge protection.

As also discussed in Section IV.H, Land Use, as part of the project, approval of a Parcel Map would be sought pursuant to LAMC §17.53 to create two legal lots at the campus, one primarily encompassing those portions of the campus beyond the boundary of the Outer Corridor (Parcel 1, approximately 10.6 acres in size), and the other primarily encompassing those portions of the campus within the Outer Corridor, plus additional area to create a legal lot (Parcel 2, approximately 7.7 acres in size). This action would not affect project development relative to the Specific Plan approvals currently sought, but would guide future development at the campus.

The proposed removal of on-site trees (both protected and not protected) is limited primarily to trees in close proximity to the existing structures and parking areas on-site. A substantial reduction or thinning in the existing (green) buffer between the school and surrounding residences is not anticipated. As indicated above, trees removed that are protected by the City of Los Angeles Protected Tree Ordinance would be replaced with at least two trees of a protected variety including valley and coast live oak or any other tree of the quercus genus (excluding scrub oak), California Walnut, California sycamore, and California bay. Refer to Response to Comment No. 12-12 for further discussion of oak tree removal and replacement.

COMMENT NO. 12-14

7. "The Specific Plan protects the view shed from Mulholland Drive."

Additional large institutional buildings as planned will ruin the view shed from Mulholland as well as Camino de la Cumbre, Coy Drive, Glorietta Pl. and Beverly Ridge, and Fossil Ridge State Park.

RESPONSE NO. 12-14

An extensive analysis of project effects on views is provided in Section IV.A, Aesthetics, of the Draft EIR; included therein are pre-development photos and post-development visual simulations illustrating the potential change in views of the site from various locations throughout the canyon. As shown, the vast majority of proposed development would occur within the existing developed portions of the campus (northern part of campus), and additional buildings would not be introduced within the central, open, undeveloped areas of the athletic field. Proposed development would have similar building heights (in terms of rooflines), building scale, and architectural elements as existing structures, and as such, the project would

generally blend into the existing campus setting. Furthermore, given the distance of the site from Mulholland Drive and most of the other local roadways cited, views of the campus would not appear noticeably altered. No structures would abut or rise above the Mulholland Drive scenic corridor, interrupt prominent ridgelines, or block views of other valued visual resources such as the San Fernando Valley and Santa Susana Mountains to the more distant north. While views of campus development from nearby locations on Camino de la Cumbre and Camino de Solana would be altered, the general site layout would remain intact, few open or natural areas of the site would be developed with new facilities, and the views of building rooftops would be essentially the same as under existing conditions. Additionally, a substantial amount of perimeter landscaping would be retained to provide privacy for neighbors and visual screening for the School, and the edges of construction would be replanted to blend with the adjacent landscape, with landscaped courtyards, walkways, and/or patios introduced around the perimeter of most buildings. As also discussed in Section IV.A, Aesthetics, of the Draft EIR, there are few accessible locations within Fossil Ridge Park that permit unobstructed views of the campus. Few project structures, other than the proposed Aquatic Center and temporary classroom bungalows, would be located near the park, and views of campus development, where available, would not change significantly. In summary, the nature and quality of views from Mulholland Drive, local residential streets, and Fossil Ridge State Park would not change substantially as a result of project implementation.

COMMENT NO. 12-15

8." Buckley is applying to create a lot split so that a portion of the campus will reside outside of the Mulholland Corridor."

Presently Buckley would not be allowed to be built because it is in the Mulholland corridor which protects residents by not allowing commercial use or Commercial businesses like Buckley.

RESPONSE NO. 12-15

Approximately 3.28 acres of the southern portion of the Buckley campus lie within the MSPSP Outer Corridor, defined as the area extending 0.5 mile from the Mulholland Drive right-of-way, excluding the Inner Corridor (the Inner Corridor extends 500 feet from the right-of-way along both sides of Mulholland Drive). The MSPSP's Outer Corridor regulations apply to project sites, such as the Buckley campus, when all or a portion of the lot to be developed is located within the Outer Corridor. Although the Specific Plan does not provide for school uses within the Outer Corridor, The Buckley School has been at its current location since the 1960s, prior to the adoption of the Specific Plan, and therefore is considered a legal non-conforming use under the Specific Plan and the City's Zoning Code. As discussed in Section IV.H, Land Use, as part of the project, the School would seek a Specific Plan Exception for relief from MSPSP Section 6A to allow the proposed expansion and operation of school facilities for an existing

legal non-conforming school (institutional) use within the Outer Corridor, pursuant to LAMC §11.5.7F and Mulholland Scenic Parkway Specific Plan Section 3C. Additionally, approval of a Parcel Map would be sought pursuant to LAMC §17.53 to create two legal lots at the campus, one primarily encompassing those portions of the campus beyond the boundary of the Outer Corridor (Parcel 1, approximately 10.6 acres in size), and the other primarily encompassing those portions of the campus within the Outer Corridor, plus additional area to create a legal lot (Parcel 2, approximately 7.7 acres in size). This action would not affect project development relative to the Specific Plan approvals currently sought. Regardless of the Parcel Map, with the necessary approvals, the proposed development is permitted on the project site.

To clarify, The Buckley School is not a commercial business, but rather a not for profit educational/institutional use. Educational uses are permitted in residential zones by the CUP pursuant to the City's Zoning Code.

COMMENT NO. 12-16

9. "Institutional Use Corridor; An area parallel to and 500 feet northerly and 500 feet southerly of the Mulholland Drive right-of-way, designated on maps 3A and 4A with a dashed black line and labeled as MPiU, beginning on the west at the intersection of Mulholland Drive and the Center line of Corda Drive. And terminating on the east at the west line of the San Diego Freeway beginning on the west at the east line of the San Diego Freeway and terminating on the east at a line that is parallel to and 4000 feet westerly of the centerline of Roscomare Road."

Buckley is not within the designated Institutional Use Corridor which is an area for Schools, churches and accessory buildings thereto.

RESPONSE NO. 12-16

As discussed in Section IV.H, Land Use, the Mulholland Scenic Parkway Specific Plan, adopted in 1992, designates an Institutional Use Corridor (within the Inner Corridor), which provides for uses such as schools, churches, and accessory buildings. As cited above, the Institutional Use Corridor extends from the centerline of Corda Drive on the west to the centerline of Roscomare Road on the east, excluding the San Diego Freeway. The Buckley School is located outside of the Institutional Use Corridor, though as discussed in Response to Comment No. 12-15, the southern portion of the campus falls within the MSPSP Outer Corridor. Refer to the discussion therein regarding the project approvals sought that related to the School's location within the Outer Corridor.

COMMENT NO. 12-17

10. Additional current violations to the Mulholland Scenic Plan

a. Buckley's rooftops are unaesthetic and are not appropriate for a residential zone or the Mulholland Specific Plan.

b. Buckley has installed a neon sign which is visible from Camino de la Cumbre, Camino de Solana and Beverly Ridge. It is not allowed in the Mulholland Specific Plan

c. Buckley has a barbwire fence that is not in character with the surrounding neighborhood (which borders Camino de la Cumbre). Such fencing material is not permitted in the Mulholland Specific Plan.

RESPONSE NO. 12-17

Most of the existing rooftops are flat in the center of each building, with gently sloping mansard roofs extending up from the eave lines and covered with Spanish-style tiles. As described in Section IV.A, Aesthetics, of the Draft EIR, the proposed buildings would have two-foot high mansard roofs and earth-tone roof tiles matching the existing Spanish-style tiles. The School is also evaluating the feasibility of including solar roofing materials on the roofs of some of the buildings within the campus.[120] In addition, any mechanical structures on the roof, such as air conditioning units and other equipment, would be screened from view of any abutting properties with single family dwellings, to the extent feasible, with materials compatible with the design of the building. Please refer to Table IV.A-1 in Section IV.A, Aesthetics, for an analysis of project consistency with the MSPSP Design and Preservation Guidelines specific to roof design. As demonstrated, project roofs would be generally consistent with the non-binding guidelines, and views of building rooftops would be essentially the same as under existing conditions.

As also discussed in Section IV.A, Aesthetics, the pole-mounted, backlit, changeable message sign located near the campus exit was planned for removal as part of the project. However, in response to neighborhood concerns, the sign was removed in July 2006. Please refer to Response to Comment No. 5-7 regarding the perimeter fencing along Camino de la

[120] *The MSPSP specifically allows rooftop solar energy devices within the Inner Corridor, including on roofs visible from Mulholland Drive. There are no restrictions on visible rooftop equipment within the Outer Corridor, in which a portion of the project site is located.*

Cumbre. As discussed therein, the School plans to remove the barbed wire as part of the project.[121]

COMMENT NO. 12-18

B. Evaluation of conflicts with a Residential zone

Buckley has been granted the right to reside partially in the Mulholland Corridor and a Residential Neighborhood because of its' Conditional Use Permit. Buckley's' institutional buildings and the density of those buildings are in contrast to the surrounding neighborhood which is considered an upscale neighborhood of aesthetic views, scenery, landscaping, and homes.

RESPONSE NO. 12-18

Please refer to Response to Comment No. 5-1 regarding the appropriateness of schools in residential neighborhoods, as well as the compatibility of the project, in terms of land use, design and School operations, with the surrounding neighborhood. As discussed, private schools such as The Buckley School are typically permitted in residential zones as a conditional use subject to issuance of a CUP in which conditions are specified to ensure compatibility with nearby residential uses. A detailed analysis of land use compatibility is provided in Section IV.H, Land Use, of the Draft EIR. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 12-19

C. Screening Criteria for a [sic] conflicts with the General Plan (material from the Threshold guideline is in quotes): C. Screening Criteria for conflicts with the General Plan (material from the Threshold guideline is in quotes):

1. "Does the project include a proposed zone change or variance that would increase density, height, and bulk in areas where there is a consistent theme, style building height and setbacks?"

Yes. The Buckley campus consists of low slung one story structures. The proposed expansion calls for two story buildings, thus resulting in an increase in density in an already over-developed site.

[121] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for further discussion.*

RESPONSE NO. 12-19

As discussed in Response to Comment No. 12-2, the proposed project does not involve a change to the General Plan land use designation for the site, nor a Zone Change. A portion of this comment repeats information provided previously in Comment No. 12-9; therefore, please refer to Response to Comment No. 12-9. Please also refer to Response to Comment No. 5-5 regarding proposed building heights. To clarify, the existing campus buildings are one to two stories in height (approximately 13 to 38 feet high); the proposed buildings would similarly consist of one to two stories. Additionally, the floor area ratio (FAR) of The Buckley School campus following project development would be approximately 0.21:1, substantially less than the 3:1 permitted FAR.

COMMENT NO. 12-20

2. "Would the project result in the removal of one or more features that contribute to the valued aesthetic character or image of the neighborhood, community, or localized area?"

Yes. A number of oak trees will be removed. Further, the hill between the football fields will be developed and retaining walls will be installed on the hill next to Camino de la Cumbre. That area provides the remaining green buffer zone separating the school from the residential neighborhood.

RESPONSE NO. 12-20

The above stated CEQA Thresholds Guideline is similar to one of the significance thresholds utilized in the analysis of project impacts in Section IV.A, Aesthetics, of the Draft EIR: a project would have a significant impact on aesthetics if existing features or elements (such as structures, public plazas, art or gardens) that substantially contribute to the valued visual character or image of an area are removed or altered in significant part by the project. As evaluated, the notable developed features that contribute positively to the character of the campus are the Bell Tower at the Lower School and the turtle pond; the former would remain in place and the latter would likely be recreated near its current location as part of the project. Please refer to Response to Comment No. 12-12 regarding oak tree removal. Refer to Response to Comment No. 12-14 regarding perimeter landscaping. As also discussed therein, new buildings would not be introduced within the central, open, undeveloped areas of the athletic field. Based on the aesthetics analysis presented within the Draft EIR, project design would not conflict with or exceed the significance thresholds specified for aesthetic impacts. As such, the impact of the project itself (i.e., post-project conditions) on aesthetics would be less than significant.

COMMENT NO. 12-21

3. "Would the project introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting with important aesthetic elements or the quality of the area (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines?"

Yes. It conflicts with theme, style and density. ....it does introduce features that detract from the valued aesthetic quality of the area, as this is a neighborhood of homes valued well in excess of One Million Dollars, and that a prolonged construction schedule could impact the worth and marketability of these homes; that owners seeking to refinance their properties might be denied on the basis that the value of the property could drop due to the ongoing construction and traffic problems from Buckley, the architectural design of the school featuring institutional buildings conflicts with the adjacent residential neighborhood theme of expansive setbacks featuring one and two story traditionally designed homes; that the location of the school borders three state parks as well as a residential neighborhood, and, as such conflicts with the area because it is commercial business operating during business hours, after-hours and weekends, which are not permitted in residential areas; and is not consistent with the Mulholland Specific Plan whose goal is to preserve and protect this corridor from over-development.

"A yes response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required."

RESPONSE NO. 12-21

The above stated CEQA Thresholds Guideline is similar to the significance thresholds utilized in the analysis of project impacts in Section IV.A, Aesthetics, of the Draft EIR, and such issues have been evaluated therein. Please refer to Response to Comment No. 5-1 for a discussion of the compatibility of the project with the surrounding neighborhood. Please refer to Response to Comment No. 5-5 regarding the proposed building heights, and Response to Comment No. 12-19 regarding the number of stories proposed and project building density. Also refer to Response to Comment No. 12-9 regarding project consistency with the Mulholland Scenic Parkway Specific Plan.

To clarify, the Buckley School is not a commercial business, but rather a not for profit educational/institutional use. Educational uses are permitted on-site by the CUP pursuant to the City's Zoning Code.

Regarding property values, CEQA Guidelines Section 15131(a) states that economic effects shall not be considered as significant impacts on the environment, except insofar as they

may cause physical changes to the environment related to the project. CEQA Guidelines Section 15145 further prohibits speculative analysis, which any analysis of effects on future property values would be considered. As such, the effect of project development on off-site property values is beyond the scope of this EIR.

COMMENT NO. 12-22

D. CONCLUDING COMMENTS:

We would like to call attention to the following: the issues discussed in this section illustrate just how Buckley School is not in conformance with Mulholland Scenic Parkway Specific Plan and the Los Angeles General Plan. Buckley should be required to be brought into conformance with these Plans through an Environmental Impact Report.

Lastly, if a developer attempted to construct a school on Buckley's site today, the application would be denied on the basis that it is not in conformance with the Specific Plan and the General Plate. We imagine it would also be quite difficult for a developer to attempt to receive approval to construct fifteen new Homes (averaging 3,500 square feet)in addition to the already numerous existing buildings on Buckley's site. The point is: If Buckley would not be permitted to build a school “today," why should it be allowed to expand?

RESPONSE NO. 12-22

The Buckley School has been at its current location since the 1960s, prior to the adoption of the Specific Plan, and therefore is considered a legal non-conforming use under the Specific Plan and the City’s Zoning Code. Please refer to Response to Comment No. 12-16 for further discussion of this issue. Also refer to Response to Comment No. 5-1 regarding the appropriateness of schools in residential neighborhoods. The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan expressly supports the expansion of schools, stating in Policy 6-1.5 that “expansion of existing schools should be preferred over acquisition of new sites.” Furthermore, educational uses are permitted in residential zones by the CUP pursuant to the City’s Zoning Code. Refer to Response to Comment No. 12-9 regarding project consistency with the Mulholland Scenic Parkway Specific Plan.

Section V, Alternatives, of the Draft EIR, evaluates several alternative development scenarios, including an entirely residential alternative, that are technically permitted within the project site. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 12-23

This raises another question: how much space does Buckley actually need? It is proposing to add 79,000 square feet to the existing 99,000 square feet; an increase of over fifty percent.

Buckley is not changing the size of its gym and administrative offices. The plans in question call for the construction of a dramatic increase in the present amount of classroom space. Buckley is now proposing to increase the student enrollment by 80 students (750 are now permitted). How many students could the expansion of 79,000 square feet of primarily classroom space accommodate down the road, beyond the proposed 80 additional students? Another 200 students, 400 students, or many more in the long run? Again, this raises the question how much space does Buckley really need to accommodate its' current needs?

In an informal survey conducted by this Association, it was determined that Buckley has enough classrooms. Apparently, Buckley lacks open space. Gym classes are held indoors because there is not enough open space for all 12 grades, which have to share the football field and small asphalt yards behind the elementary and middle school buildings. Public schools have to have a minimum of open space on their campus for the amount of students enrolled. What impact will increasing buildings on the campus have with so little flat, open space?

RESPONSE NO. 12-23

This comment refers to a previous site plan which differs from the currently proposed project and has since been selected as Alternative E to the project. A discussion of that alternative is provided in Section V, Alternatives, Subsection E, Previous Project Alternative, of the Draft EIR. To clarify, the project as currently proposed involves a net addition of approximately 69,500 square feet of building area, resulting in a total of 168,650 square feet of educational facilities within the project site. Please refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project proposal. Specific inadequacies in the School's existing facilities are detailed therein, as well as in Section II, Project Description, of the Draft EIR.

As discussed in the Project Description, the School also has a need for additional dedicated athletic facilities space, including indoor practice spaces, an additional basketball court for athletic classes and practices, and associated storage space, all of which would be separate from spaces used for other non-athletic purposes. As such, the project as currently proposed would provide for a new Aquatic Center (including an outdoor swimming pool, lockers, restrooms, a training room and office, and storage), a new basketball court, and a multi-purpose room. It is noted that there will be little change in the amount of open space provided on-site, as project development would be generally limited to the existing paved and/or developed areas of the campus. The existing soccer field and baseball diamond would be maintained.

The proposed additional educational space would allow The Buckley School to better serve its existing student population and accommodate a modest increase in enrollment without substantial expansion of the campus from its existing building footprint. The proposed student increase would enhance the School's curriculum flexibility and maximize operational efficiencies. Specifically, the increase would allow the school to offer more electives/courses, field stronger athletic teams, and increase the critical mass of the students in the Middle and Upper Schools to allow for greater social interaction. The total increase of 80 students represents a modest 10.7 percent increase above the current permitted enrollment of 750 students. Additionally, The Buckley School would continue to have a smaller student enrollment than other comparable 13-grade private schools in the area (e.g., Campbell Hall Episcopal, Chadwick School, St. Monica Elementary & High School, and Viewpoint School). Furthermore, the School has volunteered a condition that it would not request another enrollment increase for a period of 20 years.

COMMENT NO. 12-24

Buckley could have had a second Campus. St Michael's was available. Perhaps a divided campus with one site on the west side would be a good solution. Then Buckley would have two campus's with two fields for recreation and sports.

RESPONSE NO. 12-24

The Buckley School has considered splitting the campus between two sites, and numerous sites have been investigated over the past 15 years, as discussed in Section V, Alternatives, of the Draft EIR. Of the existing available facilities considered for relocating school activities, some were too small to accommodate any of the academic divisions, and some were considered impractical due to deficiencies such as a lack of indoor space for physical activity or lack of a common lunch area. Other properties considered by Buckley for lease or purchase either never proceeded beyond initial negotiations or were not ultimately sold.

Throughout these efforts, what has emerged is a strong desire and need to maintain a single campus, consistent with the vision of the School's founder. Development of a split campus would undermine the intention of Dr. Isabelle Buckley, who purchased the existing school site in the 1960s in order to unify the Lower, Middle, and Upper Schools, which had previously operated on four separate campuses (there was also a preschool at the time). The rationale for consolidating the campuses nearly 40 years ago holds true today: it allows the School to physically function on one campus to offer a comprehensive and articulated K through 12 program and to build an all-inclusive "family" community within a City that by its very size and character does not naturally lend itself to fostering an intimate sense of community. It also allows the School to employ faculty and staff who teach or work for all divisions, thus minimizing administrative costs. Additionally, since a number of school facilities, such as the athletic facilities and performance spaces, are shared between the different grades in order to

maximize efficiency in school operations, splitting the campus would preclude optimal use of such facilities to the same degree. Furthermore, development of a second campus would conflict with Objective 6-1.5 of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, which states that the expansion of existing schools is considered preferable to the acquisition of new school sites in the City. Please refer to Section V, Alternatives, for additional discussion.

COMMENT NO. 12-25

In summary, the, Sherman Oaks Homeowners Association Buckley School Committee requests that the City of Los Angeles conduct applicable studies regarding all of the issues put forth in this section (VISUAL RESOURCES (AETHIETICS [sic], VIEW, NIGHTINE [sic] ILLUMINATION,SIGNAGE) as set forth in the City of Los Angeles Threshold Guide.

RESPONSE NO. 12-25

A Draft EIR has been prepared at the direction and under the supervision of the City of Los Angeles Department of City Planning, the lead agency for the proposed project, in accordance with CEQA and the CEQA Guidelines, as amended.[122,123] Included in the Draft EIR analyses of aesthetics, views, and light and glare which can be found in Section IV.A, Aesthetics, Views and Light and Glare, of the Draft EIR. As indicated therein in Subsection B, Environmental Impacts, the methodology used to determine impacts regarding these issues were based on a list of threshold factors set forth by the City of Los Angeles Threshold Guide. As such, the Draft EIR conducted its aesthetics analysis using thresholds requested by the Commentor.

COMMENT NO. 12-26

4. GRADING OF HILLSIDE ADJACENT TO SINGE-FAMILY [sic] HOMES

We are concerned that this will have a negative effect neighboring properties.

RESPONSE NO. 12-26

This comment refers to a previous site plan which differs from the currently proposed project and has since been selected as Alternative E to the project. A discussion of this alternative is provided in Section V, Alternatives, Subsection E, Previous Project Alternative, of the Draft EIR. Under this Alternative, a semi-subterranean parking facility would be developed

[122] *Public Resources Code Sections 21000-21178.*

[123] *California Code of Regulations Title 14, Chapter 3, Sections 15000-15387.*

beneath the existing Lower School, near the base of a slope. In contrast to the proposed project, the Previous Project Alternative would involve substantial grading, excavation, and soil export in association with the parking facility. Nonetheless, it was determined that landform impacts associated with the Alternative would be less than significant.

The project as currently proposed would not involve substantial grading or excavation adjacent to the slopes that line the canyon. As discussed in Section IV.E, Geology, all grading activities would comply with applicable City of Los Angeles grading requirements. Remedial grading and recompaction of previously used uncompacted fill soils would also be performed in some areas of the site in order to improve site conditions. The project would also adhere to specific geotechnical recommendations assigned in Appendix F, Geology and Geotechnical Report, of the Draft EIR regarding grading specifications and fill placement. Activities associated with soil import/export would occur in accordance with City requirements, as specified in the LAMC and through the grading plan review and approval process. Furthermore, in contrast to the Previous Project Alternative, the project would involve nominal (i.e., less than 1000 cubic yards) soil import and/or export. As such, the project would not have a negative effect on neighboring properties with regard to grading or hillside alterations.

COMMENT NO. 12-27

5. NOISE DURING AND AFTER CONSTRUCTION

There will be noise echoing in the residential area and school compound in the "canyon" during the planned 10 year construction period. Additional students also mean more noise for neighbors. There is currently a continuous loud noise emitted from commercial fans and the air conditioning system in the gym. It is a loud hum like a freeway noise.

Because of the violation of CUP Condition #18, there is no provision for protecting neighbors from being impacted from noise, traffic, etc., during night games and other evening events:

Daytime noise, besides the sound of all of the traffic, etc., includes noise produced by installing carpets at 7 AM on a Sunday morning in order to be ready for Monday's classes.

We would like the noise impact studied since the school is operating in a residential neighborhood.

RESPONSE NO. 12-27

As discussed in Response to Comment 12-6, the commentor incorrectly states that construction is anticipated to take up to ten years. As discussed in Section II, Project Description of the Draft EIR, construction for the project would be completed in three phases totaling

approximately five years.[124] In order to keep the School in operation during construction, the three phases would be spread out over an approximate six and a half year timeframe.

The possibility of noise canyon effects was taken into consideration in the Draft EIR. An analysis was performed in the Draft EIR and is provided in Section IV.I, Noise. Results of the analysis show a maximum noise increase of 2 dBA as a result of noise reflection.

As part of the noise analysis, ambient noise levels were measured within the residential neighborhoods surrounding the project site. Measurement results demonstrate that existing ambient noise levels are dominated by existing traffic noise.

As mentioned in the Draft EIR, rooftop equipment such as air conditioning units and air handlers for the project will be designed to comply with LAMC noise criteria. To ensure that the rooftop mechanical will not exceed LAMC noise criteria, noise limits for the mechanical equipment have been specified in the Draft EIR. The design will also include noise control features such as sound attenuation enclosure and/or sound attenuation of air inlet/exhaust paths. Furthermore, the mechanical design will be reviewed by a qualified acoustical consultant to ensure the project mechanical will not exceed 50 dBA at the property line. For mechanical equipment required to operate between the hours of 10:00 P.M. to 7:00 A.M., such equipment will be designed to meet 40 dBA at the nearest residential receptor.

As discussed in the Draft EIR, the City of Los Angeles Noise Ordinance limits construction noise to between the hours of 7:00 A.M. and 9:00 P.M. on weekdays and 8:00 A.M. to 6:00 P.M. on Saturday. The School has volunteered more restrictive construction hours for the project, such that construction during most phases could occur Monday through Friday from 7:00 A.M. to 5:00 P.M. and Saturdays from 8:00 A.M. to 5:00 P.M. During Phase 2, construction days and hours would be Monday through Friday, 7:00 A.M. to 5:00 P.M. each day from September 2nd to April 30th; Monday through Friday, 7:00 A.M. to 7:00 P.M. from May 1st to September 1st; and Saturday, 8:00 A.M. to 5:00 P.M. throughout the year.[125] These construction hours are still more restrictive than those permitted by the City. The extended hours during portions of Phase 2 have been proposed in response to community concerns regarding the duration of the construction period and in an effort to ensure that the project is completed as expeditiously as possible. Specifically, the extended hours during the summer months of Phase 2 would allow for additional construction time, as needed, to complete specific tasks, allow additional time to address unforeseen issues, and maintain the integrity of the overall

[124] *Refer to Section II, Corrections and Additions, of this Final EIR for a correction to the duration of construction originally presented in the Draft EIR.*

[125] *Once a building is fully enclosed, interior construction activities occurring between May 1st and September 1st of Phase 2 may continue until the hours permitted by the City. Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for further details.*

construction schedule. This type of flexibility in the construction schedule would also permit construction crews to accomplish as much as possible during the summer months while school is not in session, which could in turn improve construction coordination and reduce traffic congestion when classes resume in the fall and a full student body is present on-site.

A comprehensive noise study has been performed for this project and is included in the Draft EIR, with revisions provided in Section II, Corrections and Additions, of this Final EIR. As disclosed, within the Draft EIR and this Final EIR, construction noise impacts would be significant and unavoidable with incorporation of all feasible mitigation measures. However, no significant impacts would occur as a result of operation of the project.

Condition 18 of the School's existing CUP establishes normal operating hours for the School and permitted hours for certain extracurricular activities. The Applicant has requested modifications to its operating hours and permitted hours and days for extracurricular activities as part of its request for a new CUP. The comment related to compliance with Condition 18 does not raise specific environmental information related to the project, but is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 12-28

6. DRAINAGE OF THE CANYON SURROUNDING BUCKLEY AND HYYDROLOGY (EXCAVATION IN NEAR PROXIMITY TO SUB-SURFACE WATER STREAMS.)

At present there is terrible drainage of the canyon. A 100,000 square [sic] two story parking lot is being proposed. We would like to have its effect on the drainage of the canyon and the underground streams examined. Presently no water is allowed to drain down into lowest part of the canyon where Buckley resides. It is essentially a wetland. A stream that flows south of Buckley is diverted to flow underneath the campus. That stream now has back-up which forms a pond which is a health hazard. It is in need as vector control. Buckley has had frequent flooding during storms. How will this affect their proposed semi-subterranean parking lot? There was a terrible landslide in this fragile canyon which blocked Camino de la Cumbre for two days and flowed directly into Buckley's back parking lot. Camino de la Cumbre becomes a storm drain during a storm because water is sand bagged and diverted from flowing into the lowest part of the canyon where Buckley resides.

RESPONSE NO. 12-28

This comment refers to a previous site plan which differs from the currently proposed project and has since been selected as Alternative E to the project. A discussion of this Alternative is provided in Section V, Alternatives, Subsection E, Previous Project Alternative, of the Draft EIR. Under this Alternative, a semi-subterranean parking facility (referenced above)

would be developed beneath the existing Lower School, near the base of a slope. As indicated in the analysis, the Alternative would not cause flooding during a 50-year storm event that would have the potential to harm people or damage property, and impacts on hydrology resulting from the Previous Project Alternative would be less than significant.

The proposed project's effects on the hydrological conditions of the site are evaluated in Section IV.G, Hydrology. As discussed therein, the local storm drain system has been designed such that runoff from most of the watershed sub-areas located adjacent to the campus drains directly to the drainage system without entering the project site as surface or sheet flow. As also discussed, flooding upstream of Camino de la Cumbre (specifically at the terminus of Camino de la Cumbre Place) was observed during heavy rains in early 2005. Based on data provided by the City and County of Los Angeles and calculations performed by KPFF (see Appendix I of the Draft EIR), the existing storm drain system is considered adequate to convey 50-year storm flows throughout the watershed, and lack of proper maintenance was most likely the cause of such off-site flooding in 2005. Please refer to Response to Comment No. 12-13 regarding the mudslide that occurred above Camino de la Cumbre in 2005. As discussed in section IV.E, Geology, the Geologic and Geotechnical Engineering Report recommends erosion control for those areas where concentrated off-site flows can carry mud and water onto the project site. As the School has no control with regard to maintaining adequate off-site drainage, off-site mudslides above Camino de la Cumbre could potentially reoccur. However, with the School's previous construction of the small berm and block wall, mudslide impacts to the project site itself would be less than significant. Note that the underground stream referenced in the comment is a misnomer and actually consists of a storm drain line that traverses the site. The project's central pedestrian walkway/fire access route has been proposed to generally align with the storm drain easement so as to protect the drain from impacts. As concluded in the Draft EIR, development of the project would not cause flooding during a 50-year storm event which would have the potential to harm people or damage property, and hydrology impacts would be less than significant.

COMMENT NO. 12-29

7. ON SIGHT [sic] OAK TREE REMOVAL

(SEE ITEM #3)

RESPONSE NO. 12-29

Project implementation would necessitate the removal of approximately 80 trees, including 28 native trees (eight coast live oak and 20 southern California black walnut).[126] In accordance with the MSPSP, written approval for oak tree removal would be sought from the City Planning Department. Additionally, in compliance with the City's Protected Tree Ordinance, all regulated trees to be removed would be replaced on at least a two-to-one basis. The proposed project actually includes the planting of over 90 new native trees, thus exceeding the required two-to-one replacement basis at a ratio of three-to-one new trees, as shown in Figure IV.A-9, Conceptual Landscape Plan, within the Draft EIR.

COMMENT NO. 12-30

8. BUILDING HEIGHT-VIEW FROM ADJOINING SINGLE -FAMILY [sic] HOMES, DANGER OF REZONING BUCKLEY TO BE OUTSIDE OF THE MULHOLLAND CORRIDOR

Buckley currently consists primarily of low slung one story structures. The proposed additional buildings will incorporate larger two scale structures, which are incompatible with the neighborhood architecture. Finding #2 from the City Plan Case no 17967 from July 9, 1987 stated the following "One of the objectives of the District Plan is "to encourage the preservation and enhancement of the varied and distinctive residential character of the District". The subject property is situated on RE15-1-H zoned land and is surrounded by "low" density single-family housing. We object to Buckley's proposal to modify height regulations to 40 feet in lieu of the 36.0 maximum, in a residential hillside zone pursuant to Lost Angeles Municipal Code Section 12.21A 17c. (The obvious intent is to protect residential neighborhoods from the construction of large institutional buildings).

Why should Buckley be granted a Specific Plan Exception to allow expansion of an existing school in the outer corridor of the Mulholland Scenic Parkway?

Currently because part of Buckley is within the Mulholland Corridor the whole parcel is treated as if it is within the Mulholland Corridor and has to abide by the restriction. If Buckley gets approval to be rezoned as two legal lots, they will be able to remove oak trees and build large institutional buildings.

[126] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the existing tree inventory and project-related tree impacts.*

RESPONSE NO. 12-30

To clarify, as discussed above, the project as currently proposed does not involve a Zone Change. Each of the issues addressed in this comment are evaluated in Section IV.H, Land Use, of the Draft EIR. Please refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project, as well as the compatibility of the project with the surrounding neighborhood. Please also refer to Response to Comment No. 5-5 regarding the proposed building heights and Response to Comment No. 12-19 regarding the number of stories proposed and project building density. In addition, refer to Response to Comment No. 12-2 regarding the requested Specific Plan Exceptions, Response to Comment No. 12-15 regarding the proposed Parcel Map, and Response to Comment No. 12-16 for a discussion of The Buckley School's institutional uses within the MSPSP Outer Corridor. It is noted that the granting of a Specific Plan Exception is permitted pursuant to LAMC §11.5.7F and MSPSP Section 3C. Furthermore, approval of the proposed Parcel Map would not inherently permit oak tree removal or "large institutional buildings," on that portion of the campus falling outside of the Outer Corridor, as the School would still be subject to applicable zoning regulations, including the City's hillside requirements, as well as the Protected Tree Ordinance (discussed in Section IV.C, Biological Resources). Refer to Response to Comment No. 12-12 for additional discussion of oak tree removal and replacement. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 12-31

9. AIR POLLUTION FROM PROPOSED 100,000 + SF SEMI-SUBTERRANEAN PARKING STRUCTURE.

The impact must be studied.

RESPONSE NO. 12-31

This comment refers to a previous site plan which differs from the currently proposed project and has since been selected as Alternative E to the project. A discussion of that alternative is provided in Section V, Alternatives, Subsection E, Previous Project Alternative, of the Draft EIR. As currently proposed, the new Parking Facility would include two levels of parking to replace the existing 214-space main surface parking lot within the northern portion of the campus. The Parking Facility would provide approximately 240 parking spaces. In addition, the project would improve on-site access and circulation, which would serve to reduce pollutant emissions. Furthermore, the parking structure would be built in accordance with Los Angeles Municipal Code requirements, and as such, adequate ventilation would be provided. As evaluated in Section IV.B, Air Quality, of the Draft EIR, as supplemented in Section II, Corrections and Additions, of this Final EIR, localized operational air quality impacts would be less than significant.

COMMENT NO. 12-32

10. EMISSION OF FRIABLE ASBESTOS DURING DEMOLITION

The impact must be studied.

RESPONSE NO. 12-32

As discussed in the Initial Study presented in Appendix B to the Draft EIR, in the event that ACM are encountered during demolition, an ACM survey would be required in accordance with SCAQMD Rule 1403. Any removal of these materials would be performed by a State-certified asbestos containment contractor. These materials would be disposed of in a Class 1 landfill, as outlined under City of Los Angeles rules and regulations. Mandatory compliance with applicable standards and procedures would reduce risks associated with ACM to acceptable levels. As such, no impacts associated with the removal of these materials during demolition would occur.

COMMENT NO. 12-33

11. BUILDING CONTINGUOUS TO FOSSIL RIDGE PARK

Buckley borders on Fossil Ridge State Park on its southern and eastern boundary and is an obvious facet in their view shed. The establishment of Fossil Ridge State Park and Oak Forest Canyon Park were keystone landmarks in habitat and paleontological resource preservation for the City of Los Angeles and State of California, for which ISPTR was proud to play a part. In 1998 Buckley's plan was soundly defeated after a widespread out cry from a diverse number of organizations and state officials that included the Sierra Club, The International Society for the Preservation of the Tropical Rainforest, the Ecology Science Center of Southern California, the Federation of Hillside and Canyon Associations, the San Fernando Valley Federation, SOHA, the Santa Monica Mountains Conservancy a state center and a councilman. If Buckley is allowed to change the zoning of Conservancy land (public land) to A-1 (private land restrictive to five acre lots) even with a convent agreement, it will be problematic for neighbors. The convent agreement which will prevent Buckley from building on the land that Buckley wants to acquire from the Conservancy around its football field, will only be enforceable if the neighbors bring a lawsuit. The city will not enforce a convent agreement.

RESPONSE NO. 12-33

This comment refers to a previous site plan which differs from the currently proposed project and has since been selected as Alternative E to the project. A discussion of that alternative is provided in Section V, Alternatives, Subsection E, Previous Project Alternative, of the Draft EIR. As discussed therein, the previous proposal involved changes to the zoning and

General Plan land use designations for the site, along with an exchange of land easements with SMMC. The project as currently proposed does not involve any of these actions. As discussed in Response to Comment No. 12-12 and evaluated in Section IV.H, Land Use, the proposed Aquatic Center is planned to be built entirely on the existing Buckley campus. However, as an alternative option, it may be built in the location of the current outdoor basketball and weight facility located at the northeast corner of the athletic field, nestled into the adjacent hillside and utilizing a portion of land currently owned by the SMMC, subject to future discussions with SMMC and upon receipt of necessary discretionary approvals from the City. Regardless of the option implemented, grading would occur within 200 feet of parklands, as defined by the MSPSP. Table IV.H-2 in Section IV.H, Land Use, addresses project consistency with the associated Environmental Protection Measures and demonstrates that the required findings can be made by the Director of City Planning to allow project development in proximity to Fossil Ridge Park. In addition, Section IV.D, Cultural Resources of the Draft EIR includes mitigation measures that would ensure that potentially significant impacts associated with the accidental discovery of paleontological resources would be less than significant.

COMMENT NO. 12-34

"A yes response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declarations or EIR may be required.

RESPONSE NO. 12-34

An Initial Study as well as a Draft EIR were prepared for the Buckley School Campus Enhancement Plan. The Initial Study is included in Appendices A and B of the Draft EIR.

COMMENT NO. 12-35

12. PALEONTOLOGICAL RESCOURCES EXCAVATION/GRADING IN GENERAL AND ADJACENT TO FOSSIL RIDGE STATE PARK)

(bold type face and quotes are used for material directly from the Threshold Guide)

A. "Paleontological resources occur throughout the City of Los Angeles." Fossil Ridge was given its' name because it is obviously a great source for fossils.

B. "Direct destruction of fossils within fossil-bearing rock units may result from grading or excavation with a project, particularly during the construction phase. Indirect destruction or loss of fossils exposed at the surface may result from increased erosion, human access, or other activity in a project area. Increased access could result from the opening of private or

otherwise closed lands, new access routes through sensitive areas, or through excavation or the removal of vegetation

C. Palenontological [sic] resources are protected by state and federal legislation. State regulations mandate protection of paleontological resources on public land and CEQA requires evaluation of impacts to paleontological sites. Paleontological resources are also subject to certain state regulation for *historical* resources. City Guidelines for the protection of paleontological resources are specified in Section VIII of the Conservation Element"

D."Screening criteria:

Could implementation of the project result in the disturbance of 'surface or subsurface fossils, either through site preparation, construction or operational activities, or through an increase in human activities at or near the fossil site?"

E. "yes response to the preceding question indicates further study in an expanded Initial Study. Negative Declaration, Mitigated Negative Declaration, or EIR may be required" (The answer in regard to the above concerning Buckley's expansion is a yes.)

RESPONSE NO. 12-35

The analysis of potential impacts to paleontological resources provided in Section IV,D, Cultural Resources of the Draft EIR indicates that deep excavations or any type of construction-related activities in the bedrock may result in a high probability of encountering remains of fossil marine vertebrates. Therefore, since excavation and construction in the bedrock may be required, implementation of the project does have the potential to result in significant adverse impacts associated with the permanent loss of, or loss of access to, a paleontological resource. However, with implementation of the proposed mitigation measures provided in the Draft EIR, potential impacts would be reduced to less than significant levels. Such measures (Mitigation Measures D-1 through D-8) include the hiring and involvement of a qualified paleontologist who must conduct a field survey prior to project construction; diversion of grading and excavation activities in the event a potential fossil is found; preparation and identification of any fossils found and donation of such to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County; and preparation of a report documenting the absence or discovery of fossil resources on-site.

COMMENT NO. 12-36

F. It appears that Buckley is creating paths on Fossil Ridge State Park without the permission of the Santa Monica Conservancy. Given this, what will the effect of it attaining State Park Land

around its football field be, with conditions of not building on it or creating illegal paths? Buckley is attempting to annex public land on Fossil Ridge through a land swap and own it privately. They then wish to excavate an Olympic size pool and build pool building. This will be done on land that has paleontological value to the public. What is the feasibility of any construction on the 12 acre+ parcel of land that Buckley is trying exchanging with the Conservancy? Is the 12 acre+ parcel unbuildable due to being swampland, having paleontologcial [sic] value, being continuous to a State Park, or due to its' access?

RESPONSE NO. 12-36

This comment refers to a previous site plan which differs from the currently proposed project and has since been selected as Alternative E to the project. A discussion of that alternative is provided in Section V, Alternatives, Subsection E, Previous Project Alternative, of the Draft EIR. To clarify, the School does not propose to annex State parkland. As discussed in the land use analysis, the proposed Aquatic Center is planned to be built entirely on the existing Buckley campus. However, as an alternative option, it may be built in the location of the current outdoor basketball and weight facility located at the northeast corner of the athletic field, nestled into the adjacent hillside and utilizing a portion of land currently owned by the SMMC, subject to future discussions with SMMC and upon receipt of necessary discretionary approvals from the City.

COMMENT NO. 12-37

13. GEOLOGY AND SOILS

City Planning Department files adequately document the instability of the hillside directly above Buckley School to the west. A significant part of the soil instability is a result of the following: Frank Reister, who at one point owned most of the property to the west of Camino de la Cumbre, and what is now Beverly Ridge, was the owner of all the property above Buckley School on its entire western boundary. During the 1950's the developers of Beverly Ridge development received permission from Frank Reister to grade the top of Beverly Ridge and spread the loose fill onto the hillside below, which at that time still belonged to Reister, thus saving them the cost of transporting the earth offsite.

The uncompacted fill covering the unstable diatonaceous [sic] shale buried the existing chaparral and the fill went uncompacted. You can readily see the difference in plant growth on Fossil Ridge to the east, Clothed completely in climax chaparral and below Beverly Ridge which remains today covered only by grasses, native tobacco, mustard (exotic species) and scattered black walnut trees, all secondary growth vegetation in transition. It is noteworthy that those steep slopes on Fossil Ridge suffered no slippage at all over the years. To the contrary, as a result of the fill overlay, each "hundred year" storm, which seems to occur about every ten years,

produces massive mud floods onto Camino de la Cumbre directly above the Buckley back gate (see photo of that that and other severe storm events enclosed), and narrowly missed taking people and cars with it. Theo Seeley, Geology Technical engineer for the city, while inspecting the slide, stated that "it was the largest mud slide he seen" during this severe storm. In 1988, mud floods completely requiring complete excavations both outside and in. In addition, subterranean streams in the proximity of the excavation for the parking structure would be impacted.

We appeal to your mandate to "cause no harm" and "err on the side of caution." A severe earthquake, which is well overdo [sic], says seismologists, could easily be perceived as an event which destabilizes the hillside and put at risk homes above and beside the parking structure.

RESPONSE NO. 12-37

This comment makes reference to a previous site plan which differs from the currently proposed project and has since been selected as Alternative E to the project. A discussion of this alternative is provided in Section V, Alternatives, Subsection E, Previous Project Alternative, of the Draft EIR. Under this Alternative, a semi-subterranean parking facility would be developed beneath the existing Lower School, near the base of a slope.

Information regarding recent off-site mudslides is provided in Sections IV.E, Geology, and IV.G, Hydrology, and summarized above in Response to Comment No. 12-13. The Geologic and Geotechnical Engineering Report provided as Appendix F to the Draft EIR recommends erosion control for those areas where concentrated off-site flows can carry mud and water onto the school site. As the School has no control with regard to maintaining adequate off-site drainage, off-site mudslides above Camino de la Cumbre could potentially reoccur. However, with the School's previous construction of a small berm and block wall, mudslide impacts to the project site itself would be less than significant.

As also indicated in Section IV.E, Geology, site conditions are grossly stable from a geologic standpoint. Specifically, the natural residual soil was determined to be superficially stable, and the natural slopes do not exhibit signs of slope failure. Furthermore, the project would implement site-specific geotechnical recommendations (provided in Appendix F), to ensure adequate slope stability. As such, the project would not cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Potential impacts associated with seismically induced landslides would be less than significant.

The "subterranean streams" referenced in the comment are a misnomer and actually consist of a storm drain line that traverses the site. The project's central pedestrian walkway/fire access route has been proposed to generally align with the storm drain easement so as to protect the drain from impacts.

COMMENT NO. 12-38

14. EFFECT ON WILDLIFE;

A petition with over 13,000 signatures supported the creation of Fossil Ridge Park. The canyon is appreciated by the immediate neighborhood and greater community. It is a preserve for a wide variety of wildlife including deer, raccoons, skunks, owls, hawks, rabbits, pheasants, coyotes, possums and also a wildcat. What would the effect be of additional buildings and excavation particularly on the greenbelt and what would the effect be on wildlife from the noise of a ten year construction period?

RESPONSE NO. 12-38

As discussed in Response to Comment 12-6, the commentor incorrectly states that construction is anticipated to take up to ten years. As discussed in Section II, Project Description of the Draft EIR, construction for the project would be completed in three phases totaling approximately five years, spread out over an approximate six and a half year timeframe.[127]

As discussed in Section IV.C, Biological Resources, as amended in Section II, Corrections and Additions, of this Final EIR, based on the review of relevant literature, the review of data on sensitive habitats and species in the region (e.g., CNDDB), the presence of a limited amount native vegetation within the area to be developed (0.6 acre of California walnut-coast live oak woodland, less than 0.1 acre of coast goldenbush grassland, and less than 0.1 acre of coyote brush scrub), the location of proposed development within currently developed areas, and the abundance of non-native ornamental landscaping, the project would not result in the loss of individuals, or the reduction of existing habitat, of a local, State or Federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern. In addition, given the general lack of sensitive species on the project site and the existing developed nature of the site, the proposed project would not interfere with habitat use (directly or indirectly) such that normal species' behaviors are disturbed to the degree that may diminish the chances for long-term survival of a sensitive species.

COMMENT NO. 12-39

15. FIRE AND EARTHQUAKE EVACUATION

[127] *Refer to Section II, Corrections and Additions, of this Final EIR for a correction to the duration of construction originally presented in the Draft EIR.*

Recently the people of Los Angeles witnessed terrible wildfires that took place in canyons and fire Zones of Southern California. Is it environmentally sound to expand the campus since it is in a fire zone?

If there was a fire or earthquake in our canyon, evacuation would be a very serious problem. Parents picking tip their students in cars as well as emergency vehicles would have a major problem trying to approach Buckley by way of Stansbury. Stansbury is often a traffic jam that extends for several blocks even without a fire. The neighborhood residents between the school and Mulholland Drive would all try to evacuate by driving down Camino de la Cumbre. There are over 300 homes on Coy, Glorietta Street, Glorietta Place, and Camino de Solana. Because many of the students from Buckley live on the west side, hundreds of Buckley parents could also clog Camino de la Cumbre in an attempt to reach the school.

In 2006 Camino de la Cumbre was closed twice. A landslide that went into Buckley's back gate kept the street closed for 4 days.

Another incident required fire trucks (see attachments). These blocked Camino de la Cumbre because it is a narrow substandard street. Buckley really only has one entrance that is adequate and a school is suppose to have to [sic] entrances. Because Camino de la Cumbre is substandard there is a potential disaster during a fire or earthquake.

RESPONSE NO. 12-39

As discussed in Response to Comment No. 7-10, above, emergency access to the School would continue to be provided via Stansbury Avenue and Camino de la Cumbre. The City of Los Angeles Fire Department has determined that adequate emergency access to the site is available.[128] In addition, emergency access within the site would be provided through the central portion of the site via the project's proposed pedestrian walkway, which would be maintained as an access route for the Fire Department per City standards. In the event that evacuation of the entire campus is required, emergency evacuation procedures would be undertaken by the School. Specifically, School faculty and staff would escort students on foot to the off-campus evacuation site at Van Nuys-Sherman Oaks Park on Huston Street. An alternate evacuation area has also been designated at the surface parking lot on Hazeltine and Ventura Boulevard. As a part of these procedures, only emergency vehicles would be allowed on/off campus and parents would pick up their students at the off-campus evacuation site. Additionally, under these circumstances a disaster situation broadcast system would be used to notify parents of evacuation procedures, as described in Response to Comment No. 7-10.

[128] *Project plans and an associated LAFD permit application were signed, stamped and approved by Joseph Johnson, Inspector, Los Angeles Fire Department, on February 27, 2007.*

The LAFD has indicated that evacuation may not always be optimal depending on the nature of an emergency. Under certain circumstances "secure in place" methods may be implemented such that students, faculty and administrators are kept on the campus in a secure location. Under this scenario the School's emergency broadcast system would be activated to notify families and communicate appropriate action. Further, in other emergency instances the School may be asked to provide shelter for the community.

COMMENT NO. 12-40

16. UNSAFE SECOND EGRESS

The back gate of Buckley exits on Camino de la Cumbre, a substandard street. Presently the exit is in a blind curve which needs to be studied and changed for safety. The street is unsafe for pedestrian traffic because Buckley's barbwire fence prevents a path from existing adjacent to its campus. A child was hit on Camino de la Cumbre and another resident's car was hit on the left side by a Buckley parent at the intersection of Camino de la Cumbre and Ventura Boulevard.

RESPONSE NO. 12-40

Refer to Responses to Comment Nos. 7-10, 12-8 and 12-39 regarding emergency access and use of Camino de la Cumbre.

COMMENT NO. 12-41

17. LIFE SAFETY. Because Stansbury becomes a narrow street between Valley Vista and Buckley there are times of each school day when it is impossible for an emergency vehicle to get through. One resident on this street had a stroke and another has had a heart attack and ambulance access was extremely difficult in both cases. Adding more students to the school will increase the traffic congestion during drop off and pick up hours. Doctors are unable to park near patients homes because of the traffic, which could also be dangerous in an emergency.

RESPONSE NO. 12-41

Refer to Responses to Comment Nos. 7-10, 12-8 and 12-39 regarding emergency access and use of Stansbury Avenue.

COMMENT NO. 12-42

18. HAUL-ROUTE (EXPORT OF 51,000+/ CUBIC YARDS OF DIRT

What would be the effect of massive amounts of dirt being exported from Buckley? Home [sic] many haul trips would there be?

RESPONSE NO. 12-42

This comment refers to a previous site plan which differs from the currently proposed project and has since been selected as Alternative E to the project. A discussion of this alternative is provided in Section V, Alternatives, Subsection E, Previous Project Alternative, of the Draft EIR. Under this Alternative, the semi-subterranean parking facility would require substantial earthwork, necessitating a total of approximately 66,700 cubic yards of cut, 15,250 cubic yards of fill, and approximately 51,450 cubic yards for export, including approximately 48,500 cubic yards of export associated with the parking facility itself. In comparison, under the proposed project, the parking facility would have minimal effects, requiring approximately 20,341 cubic yards of cut, approximately 19,503 cubic yards of fill, and nominal (less than 1,000 cubic yards) of soil import/export.[129] As described in Section II, Project Description, the lower parking level of the proposed parking facility would be constructed at roughly current grade (approximately 776 feet (asl)), with the upper parking level above it. The areas immediately east of the parking levels would be filled in with soil materials graded or excavated on-site. The remaining soils would be used to raise the campus driveway, arrival plaza, and athletic field. By raising the finished grade in this area of the campus, the project's excavated soils would be accommodated on-site, thereby nearly eliminating the need for soil export/import and minimizing associated truck trips.

As explained in Section IV.J, Transportation and Circulation, of the Draft EIR, haul, concrete, delivery and other heavy-duty construction truck trips were calculated and converted to passenger car equivalents (PCE) by using a multiplier factor. According to Circular Number 212 of the Transportation Research Board, truck trips are typically converted using a PCE multiplier of 2.0. However, to ensure a further conservative analysis and to account for the effect of the hillside terrain around the project site, a PCE factor of 2.5 was applied to medium duty or lighter delivery trucks, while a PCE factor of 3.0 was applied to heavy-duty delivery/hauling, concrete, bottom dump, and special use trucks. Additionally, all of the construction trips were based on the highest daily construction-related traffic generated per week each month, rather than an average of all of the weeks each month. These trips were also based on a conservative assumption that all construction-related vehicles would park on-site throughout the construction process. Utilizing these conservative assumptions, construction of the project would generate a range of approximately 84 to 416 daily haul trips, with an average of 176 daily trips. Based on the traffic analysis, the only street segment to be significantly affected by construction trips would be Stansbury Avenue south of Valley Vista Boulevard.

[129] *Refer to Section II, Corrections and Additions, of this Final EIR for a revision to the earthwork volumes originally presented in the Draft EIR.*

COMMENT NO. 12-43

19. QUALITY OF LIFE

Finding # 4 from the City Plan Case No 17967 stated "A substantial number of complaints have been received from residents of the neighborhood concerning the activities at the school and conduct of students and other who have visited the facility over the years including poor driving conduct, excess parking spilling into the adjacent neighborhood, and commercial activities upon the site which conflict with the peace and enjoyment of the neighborhood residents."

Finding #6 stated that there appears to be a correlation between the leasing of school facilities to other entities along with evening and weekend operation and environmental impacts associated with them."

Other issues in regard to the loss of quality of life include speeding on Stansbury and Camino de la Cumbre by Buckley students, littering along neighborhood streets, and students gathering south of the school where there is smoking of cigarettes and questionable substances in a fire zone.

RESPONSE NO. 12-43

Relative to parking and traffic issues, included within the project are increased parking and vehicular circulation and queuing improvements, which would directly benefit the surrounding neighborhood. Please refer to Section V.J, Transportation and Circulation, of the Draft EIR and Section II, Corrections and Additions, of this Final EIR for details. Also refer to Response to Comment Nos. 7-2 and 12-31 herein for further discussion.

Regarding quality of life issues, CEQA Guidelines Section 15131(a) states that social effects shall not be considered as significant impacts on the environment, except insofar as they may cause physical changes to the environment related to the project. As such, quality of life issues are beyond the scope of this EIR. Nonetheless, this comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 12-44

20. VIOLATIONS OF THEIR CURRENT CONDITIONAL USE PERMIT

The school has not shown itself to be a good neighbor through the years as evidenced by these findings before the City of Los Angeles:

Finding #13 of City Plan Case No. 17967 stated "There is sufficient evidence to suggest a pattern of conduct by the school which is inconsistent with Condition No 12 (adequate parking) and Condition No. 14 (due regard. for the adjacent residential area) which were previously imposed and, that to further safeguard against the disadvantageously affecting the surrounding residential community, the Commission is imposing Conditions Nos. 15 through 23..." Moreover,

Finding #14 "The additional Conditions of Approval (No 15-23) are necessary to protect the best interest of the surrounding property, to eliminate; operations are compatible with the surrounding properties and to insure an appropriate development in harmony with the General Plan.

Presently, Buckley continues to violate Conditions in its' [sic] current Conditional Use Permit. Therefore, the application for new Conditional Use Permit should be denied, based on the following reasons:

1. Buckley has "over-enrolled" in 5 of the last 8 years. Condition# 1 of the CUP limits the school to 750 students. Buckley has exceeded this limit 5 times since 1996. In fact, in 2004, it had 762 students enrolled-12 beyond the CUP limit!

2. Buckley's "traffic and management plan" drafted in 1988 per Condition #22 of their CUP has failed to solve the continued traffic congestion problem on Stansbury Ave. Buckley will never be able to alter the fact that Stansbury is a narrow Cul-de-sac and that Camino de la Cumbre is a substandard street. The Underground parking with its additional spaces will just mean more traffic servicing a larger school, to the detriment of the neighborhood.

3. Buckley continuously ignores Condition #23 of it [sic] CUP which requires notice to all residents within 600 feet of the school that its calendar of extracurricular activities and events is available at the Planning Commission, office of the Council member, and residents on Stansbury north of Valley Vista.

4. Buckley has refused to provide sufficient evidence for neighbors to determine if the school is in compliance with Condition 319 [sic] which places reasonable limits on extracurricular activities and events on weekends and evenings. In response to our most recent request for this information Buckley responded with an "attorney letter" from Latham and Watkins informing neighbors that "this requirement was limited to only three years beginning with the Fall 1987 semester." This is an example of why Buckley should not be given a new CUP with any additional loopholes that their law firm can use to their advantage to the detriment of the neighborhood.

5. Buckley has continuously failed to comply with Condition #15 of its CUP-the annual filing of its school census with the planning commission. This filing was only recently done after neighbors appealed to Councilman Jack Weiss for his assistance with Buckley's compliance.

Due to its history of CUP violations, Buckley should be denied approvals such as a Specific Plan Exception, a Community Plan (General Plan) Amendment, a Zone Change, and a Preliminary Parcel Map including Oak Tree removal and Haul Route approval.

RESPONSE NO. 12-44

As discussed in Section V.J, Transportation and Circulation, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, included within the project are increased parking and vehicular circulation and queuing improvements. These improvements would provide adequate parking for proposed uses as well as address queuing along Stansbury Avenue. Please refer to Response to Comment Nos. 7-2 and 12-31 herein for further discussion.

The comments related to compliance with conditions of approval of the School's existing CUP do not raise specific environmental information related to the project, but are acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 12-45

Section 3. Conclusion

The Buckley School is one of only a small handful of K-l2 independent schools in the City of Los Angeles located on just one campus. The others, Harvard Westlake, Oakwood, and Brentwood all have second campuses.

Buckley is likely the only single-campus K-12 situated at the terminus of a street zoned exclusively for single-family homes (RE-15) with a second exit on a sub-standard street.

Accordingly, we strongly urge the Environmental Review section to consider alternatives to Buckley's proposed expansion and urge the Review to reject Buckley's request for modifying their current CUP.

Over 700 signatures of surrounding neighbors in opposition to the expansion plans were collected by the Buckley Committee.

Said alternatives to the expansion include, (1) "splitting" the campus to two locations in lieu of expanding their existing location, (2) "shuttling" students and staff from an offsite location in

lieu of the proposed parking structure, and/or (3) maintaining the existing campus at its current size and population (the no project alternative).

RESPONSE NO. 12-45

An array of feasible project alternatives is evaluated in Section V, Alternatives, of the Draft EIR, including: Alternative A, No Project/No Build Alternative; Alternative B, Alternative Use (All Residential) Alternative; Alternative C, Single Level Parking Facility Alternative; Alternative D, No Parking Facility Alternative; and Alternative E, Previous Project Alternative. A discussion of those alternatives that were considered but rejected as infeasible is also provided and addresses an Alternative Site, a Split Campus Alternative, a Reduced Intensity Alternative, and Off-Site Parking. Please refer to that analysis, as well as Response to Comment No. 12-24 regarding a split campus.

To clarify, the project site is zoned RE40-1-H (Residential Estate, Height District 1, Hillside). Private schools are permitted within the RE zone by CUP, through which design and/or operational conditions of use may be imposed and enforced by the City.[130] The existing school uses are permitted and operated on the site pursuant to a CUP approved in 1965 and modified in 1987 by the City of Los Angeles Planning Commission. In the City of Los Angeles, numerous private schools are located on properties zoned for residential uses, reflecting the need for schools to be located in residential areas in order to serve a local population. As discussed in Section IV.H, Land Use, a limited sampling of the many private elementary, middle and high schools located in or adjacent to residential areas includes: Notre Dame High School in Sherman Oaks; The Archer School for Girls, Berkeley Hall, Brentwood School, Curtis School, Milken High School, Mirman School, St. Martin of Tours, and Westland School, all in Brentwood; John Thomas Dye, Marymount High School, Harvard-Westlake Middle School, and Stephen S. Wise Temple Elementary School, all in Bel Air; Campbell Hall Episcopal, and Harvard-Westlake Upper School, both in Studio City; The Wesley School and Oakwood Elementary and Secondary Schools in North Hollywood; and Crespi Carmelite High School and Our Lady of Grace in Encino. More specifically, area schools with challenging ingress/egress issues include the Center for Early Education, Brentwood School, Harvard-Westlake Middle School, and Crespi Carmelite High School.[131] Numerous other private schools are located in other residential communities throughout the City, and many of these schools have a single campus. In addition, many have recently modernized and/or expanded at their existing locations, and such improvements are consistent with the City's well-established policy of siting and maintaining

[130] *Los Angeles Municipal Code, Zoning Code, Section 12.24.U.24.*

[131] *Furthermore, within the City of Glendale, Glendale Adventist Academy is located on a cul-de-sac at the northerly terminus of Kimlin Drive, north of Chevy Chase Drive. The School's enrollment is currently estimated at 675 students (grades K-12). Additionally, Village Christian School in the City of Sun Valley is located on a cul-de-sac. The annual K-12 enrollment is approximately 1,950 students.*

schools in residential areas. Similarly, the proposed campus enhancements would support a City policy (Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Policy 6-1.5) that the improvement of existing school facilities, when properly conditioned through the discretionary review process, is preferred over the construction of entirely new school facilities within established residential areas.

LETTER NO. 13

Jack and Carolyn Cowles
jackncarolyn@adelphia.net

COMMENT NO. 13-1

I strongly urge you to decline Buckley School's plans to expand facilities, enrollment and campus activities. In an effort to be brief, I will restrict my argument to a simple phrase: THE SPIRIT OF THE ORIGINAL CONDITIONAL USE PERMIT.

In 1965, Buckley was given a CUP to build a school of limited size, limited enrollment, and limited activities. All of the reasons for the limits are obvious and well known. The site is located in an ecologically fragile canyon, with very poor access, and surrounded by an old established, quiet, residential neighborhood. In other words, the site itself was limited. The site would only support a small school.

Mr. Liao, nothing has changed since 1965 except Buckley's ambitions for a larger school. My wife and I have lived directly adjacent to Buckley on Camino de la Cumbre since 1978, so we can speak from a long history of Buckley's ambitions, their broken promises and their arrogance.

RESPONSE NO. 13-1

Please refer to Response to Comment No. 5-1 regarding the appropriateness of schools in residential neighborhoods, as well as the compatibility of the project in particular, in terms of land use, design and School operations, with the surrounding neighborhood. As discussed therein, the additional square footage proposed would allow the School to update many of its existing aging and inadequate facilities. More specifically, as discussed in to Comment No. 12-23, the proposed additional educational space would allow The Buckley School to better serve its existing student population and accommodate an increase in enrollment without substantial expansion of the campus from its existing building footprint. The total increase of 80 students represents a 10.7 percent increase above the current permitted enrollment of 750 students. The Buckley School has a smaller student enrollment than other comparable 13-grade private schools in the area. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 13-2

They have tried for decades to trade the promise of traffic abatement for our acquiescence to their expansion. They have promised traffic abatement since 1965, yet traffic still blocks Stansbury twice a day, every school day, morning and afternoon.

I invite you to drive by and take a look at that traffic. Then stop and ask the people who live on the street how many times Buckley has promised to do something about it. You can be the judge of Buckley's credibility.

Thank you for you time and consideration,

RESPONSE NO. 13-2

Mitigation Measure J-4, as revised within this Final EIR, and Mitigation Measures J-5 and J-6 are proposed to reduce project traffic impacts to a level that is less than significant. In addition, a new two-level parking structure and new arrival plaza will be constructed as a part of the project to provide adequate site access and circulation on-site in order to eliminate vehicular queuing on Stansbury Avenue. Also refer to Response to Comment Nos. 7-2 and 12-8 for further discussion.

LETTER NO. 14

Kathi and Tom Flood
3968 Camino de la Cumbre
kathi@kathiflood.com
818/986-7073

COMMENT NO. 14-1

Hello: Our observation is that the neighbors are very much opposed to the huge scope of this expansion plan. We are active in local environmental issues and we have had occasion to knock on doors, give out information and engage in discussions, participate in meetings, and keep in touch with the people that live surrounding the campus. Our personal conclusion is that this project will reduce the quality of life for all concerned and should be scaled back. Modernization of existing buildings should be done, but expansion should occur at another site.

RESPONSE NO. 14-1

This comment does not raise specific environmental information related to the project, but is acknowledged and will be forwarded to the decision-makers for review and consideration. It is noted that the City Planning Department has also received letters from local neighbors who support the proposed project, as included in this section of the Final EIR. Regarding quality of life issues, CEQA Guidelines Section 15131(a) states that social effects shall not be considered as significant impacts on the environment, except insofar as they may cause physical changes to the environment related to the project. As such, quality of life issues are beyond the scope of this EIR. Please refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project and Response to Comment No. 12-19 regarding project building density.

An array of feasible project alternatives is evaluated in Section V, Alternatives, of the Draft EIR. A discussion of those alternatives that were considered but rejected as infeasible is also provided and addresses an Alternative Site and a Split Campus Alternative, among others. Please refer to that analysis, as well as Response to Comment No. 12-24 regarding a split campus.

COMMENT NO. 14-2

After looking at the Report, many red flags appeared. Here are a few concerns:

- Page 460: "noise ... will exceed 5dBA during all construction phases"

Excessive noise for a number of years is too much for the neighborhood to bear, and if it exceeds government regulations, why is it to be allowed?

RESPONSE NO. 14-2

The construction noise analysis assumes that the maximum amount of equipment located on-site would be operating simultaneously along the property line closest to sensitive receptors. Under real world conditions, this scenario would not take place on a daily basis throughout the construction duration. Maximum construction noise levels would occur during the preparatory and finishing work which would last several months during each phase. Construction equipment also moves around the site during different phases. As the equipment moves away from the property line, noise levels at sensitive receptors would decrease. During the preparatory and finish work, all pieces of equipment are not expected to be operating simultaneously on a daily basis.

As a result of the noise impacts, mitigation measures have been provided in the Draft EIR to lessen the noise impact to sensitive receptors. However, noise impacts during construction would continue to exceed the 5 dBA significance criterion at multiple receptor locations intermittently during all project construction phases even with implementation of feasible mitigation measures. As such, construction-period noise impacts would be temporary, but would be significant and unavoidable.

COMMENT NO. 14-3

- Page 461 "C: Significant Irreversible Environmental Changes"

This statement defines the fact that our general quality of life in the neighborhood will be reduced for years.

RESPONSE NO. 14-3

Per CEQA Guidelines Section 15126.2(c), an EIR is required to assess the potential for significant irreversible environmental changes to occur as a result of a project. As discussed in Section 15126.2(c), irreversible impacts may include the use of nonrenewable resources, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Additionally, irreversible damages can result from environmental accidents associated with a project.

As discussed in Section VI, Other Environmental Considerations, subsection C, Significant Irreversible Environmental Changes, of the Draft EIR, the project would result in irreversible impacts related to construction and operation due to the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses during the life of the project. However, continued use of such resources would be of a relatively small scale and would be consistent with regional and local growth forecasts in the area. Furthermore, the loss

of such resources would not be highly accelerated as compared to existing conditions. In addition, project implementation would result in energy efficiency upgrades with the introduction of a central plant, as well as with the potential introduction of solar roofing materials on the roofs of some campus buildings, which would allow the School to generate a portion of its own electricity demand. As such, although some irreversible environmental changes would result from the project, such changes would not be considered significant. Development of the project represents the continuation of educational uses on land that is already committed to such uses. Such a commitment of resources would be justified, as educational uses are permitted in residential zones by the CUP pursuant to the City's Zoning Code.

COMMENT NO. 14-4

- Page 34: "emergency access is provided by Camino de la Cumbre".

Camino de la Cumbre is a substandard road with a hairpin turn, and some parts of the road are only 19 feet wide.

RESPONSE NO. 14-4

See Response to Comment Nos. 7-10 and 12-8 regarding the use of Camino de la Cumbre for emergency access.

COMMENT NO. 14-5

- Page 451: "in an emergency ... all would meet at VN-SO Park and only emergency vehicles would be allowed to enter."

And

Page 461: "The school is located in a 'Very High Fire Hazard Severity Zone'"

We wonder what would really happen in a serious emergency. Infractions of the CUP Agreement have previously occurred. Expansion of the student body would just make an earthquake or fire evacuation more dangerous than it already is in this delicate cul-de-sac When we asked the last headmaster what would occur in an emergency, he said, "People are going to do what they are going to do", indicating that the administration cannot be responsible for parents' actions.

RESPONSE NO. 14-5

As discussed in Response to Comment Nos. 7-10, 12-8 and 12-39, emergency access to the School would continue to be provided via Stansbury Avenue and Camino de la Cumbre. The City of Los Angeles Fire Department has determined that adequate emergency access is available to and from the site and that emergency access provided in connection with the proposed project also would remain adequate.[125] Emergency access within the campus would be provided through the central portion of the site via the project's proposed pedestrian walkway, which would be maintained as an access route for the Fire Department per City standards. In addition, as indicated in the Initial Study provided as Appendix B to the Draft EIR, the new buildings would include fire sprinklers, fire alarm devices, and all other approved fire safety technologies in compliance with local and State code requirements.

As indicated in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, in the event that evacuation of the entire campus is required, emergency evacuation procedures would be undertaken by the School. Specifically, all students, faculty, and staff would gather in fire drill lines for attendance in the school parking lot. School faculty would then escort students on foot to the campus evacuation site at Van Nuys-Sherman Oaks Park or to the alternate evacuation area on Hazeltine and Ventura Boulevard. As a part of these procedures, only emergency vehicles would be allowed on/off campus and parents would pick up their students at the off-campus evacuation site. Under these circumstances a disaster situation broadcast system would be used to notify parents of evacuation procedures, as described in Response to Comment No. 7-10. As also discussed in Section IV.F, Hazards and Hazardous Materials, the School's emergency evacuation plan would be subject to LAFD review and approval, and the plan shall be included in the Department of City Planning file for the project and distributed to the City Council Office, the local homeowners' associations, and to a list of neighbors mutually agreed upon with the Sherman Oaks Homeowners Association (SOHA), including all homes on Stansbury Avenue south of Ventura Boulevard.[126]

The LAFD has indicated that evacuation may not always be optimal depending on the nature of an emergency. Under certain circumstances "secure in place" methods may be implemented such that students, faculty and administrators are kept on the campus in a secure location. Under this scenario the School's emergency broadcast system would be activated to notify families and communicate appropriate action. Further, in other emergency instances the School may be asked to provide shelter for the community.

[125] *Project plans and an associated LAFD permit application were signed, stamped and approved by Joseph Johnson, Inspector, Los Angeles Fire Department, on February 27, 2007.*

[126] *Refer to Section II, Corrections and Additions, of this Final EIR for information regarding this project feature.*

In addition, as discussed in Section IV.J, Transportation and Circulation, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, vehicle access and queuing would be improved as a result of the project, thus reducing traffic impacts and improving emergency access on adjacent roadways. Refer to Response to Comment Nos. 7-2 and 12-8 for further discussion.

COMMENT NO. 14-6

- Page 459: "air quality exceeds SCAQMD regional significant thresholds for NOx even with mitigation measures"

Excessive air quality problems on a longterm basis are illegal, so like the noise problem, why is it to be allowed?

Thank you for your consideration. We welcome further inquiry into these and other concerns the neighbors are currently raising, and we appreciate Buckley's patience and attention to our ideas.

RESPONSE NO. 14-6

It is important to note that the significant NOx impacts identified in the Draft EIR and cited in this comment are associated with short-term construction regional emissions only. As demonstrated within Section IV.B, Air Quality, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, no significant local or regional air quality impacts would result from the long-term operation of the project.

An analysis of localized construction-related NOx emissions was also included in the Draft EIR, as is amended in Section II, Corrections and Additions, of this Final EIR. As indicated therein, localized impacts from construction related NOx emissions would be below the SCAQMD recommended incremental significance threshold for NOx, and as such, potential health related impacts on a localized basis would be less than significant.

LETTER NO. 15

Robert M. and Isabelle Fox
3929 Stansbury Ave.
Sherman Oaks, CA 91423

COMMENT NO. 15-1

As Buckley's next door neighbor, at 3929 Stansbury for 40 years; and as a long time supporter of private education, we call your attention to two problems which are easy to miss when reviewing the 500 page EIR;

1. Buckley, with its 750 students, plus 200 teachers and others, is already much too large to be situated in a 100% single family residential area.

RESPONSE NO. 15-1

The existing school uses are permitted and operated on the site pursuant to a CUP originally approved in 1965. Please refer to Response to Comment No. 5-1 regarding the appropriateness of schools in residential neighborhoods, as well as the compatibility of the project, in terms of land use, design and School operations, with the surrounding neighborhood. A detailed analysis of land use compatibility is provided in Section IV.H, Land Use, of the Draft EIR. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 15-2

It has been creating horrendous traffic volume on Stansbury twice each day for almost 40 years and this problem should not be escalated.

2. This continuing problem will be greatly aggravated if Buckley is allowed to add 80 students, plus 15-20 other personnel- teachers and others. And even more traffic will come from Buckley's decision to relinquish the 100 parking spaces now leased from Fashion Square, since the cars using these spaces must join the hundreds of vehicles now entering and leaving Buckley each day.

Remember that Buckley is situated at the southern dead end-cul-d-sac [sic] of Stansbury, which is a 35 foot street with parking on both sides. All of Buckley's present population - of almost 1,000 students and others - go in and out of this dead-end entrance twice a day. (The rear entrance onto 18 ft wide Camino de la Cumbre is unusable.)

RESPONSE NO. 15-2

Refer to Response to Comment Nos. 7-2, 12-4 and 12-7 with regard to impacts of the project associated with traffic and access.

COMMENT NO. 15-3

Also, Buckley is the only Los Angeles school of any size whose sole means of ingress and egress is at the dead-end of a residential street.

RESPONSE NO. 15-3

As described in Response to Comment Nos. 7-10 and 12-39, the LAFD has determined that adequate emergency access is available to the project site.[127] Secondary access to the site is permitted via Camino de la Cumbre, as discussed in Response to Comment No. 12-8. Please refer to Response to Comment No. 5-1 regarding the compatibility of the project with the surrounding neighborhood. Additionally, as discussed in Response to Comment No. 12-45, several area schools including the Center for Early Education, Brentwood School, Harvard-Westlake Middle School, and Crespi Carmelite High School have challenging ingress/egress issues.[128] Many have recently modernized and/or expanded at their existing locations, and such improvements are consistent with the City's policy of siting and maintaining schools in residential areas.

COMMENT NO. 15-4

For obvious reasons, we are very concerned about the consequences of a fire, earthquake or other emergency in such a confined residential area. It is hard to imagine the chaos as thousands of parents rush to retrieve their offspring.

RESPONSE NO. 15-4

Refer to Response to Comment Nos. 7-10, 12-8 and 12-39 regarding emergency evacuation procedures and the adequacy of emergency access to the site. As discussed, as a part of the School's evacuation procedures, only emergency vehicles would be allowed on/off campus and parents would pick up their students at the off-campus evacuation site. Under these

[127] *Project plans and an associated LAFD permit application were signed, stamped and approved by Joseph Johnson, Inspector, Los Angeles Fire Department, on February 27, 2007.*

[128] *Furthermore, within the City of Glendale, Glendale Adventist Academy is located on a cul-de-sac at the northerly terminus of Kimlin Drive, north of Chevy Chase Drive. The School's enrollment is currently estimated at 675 students (grades K-12). Additionally, Village Christian School in the City of Sun Valley is located on a cul-de-sac. The annual K-12 enrollment is approximately 1,950 students.*

circumstances a disaster situation broadcast system would be used to notify parents of evacuation procedures.

COMMENT NO. 15-5

In their just released EIR, Buckley has grossly understated the true vehicle count. Our chairperson, Vivian Gumbiner, using a mechanical counter starting at 7:11 A.M. on a morning this month, found that 503 vehicles entered and 407 exited during the morning peak hour. I also verify that well over twenty additional vehicles had already entered before Mrs. Gumbiner started to count at 7:11 A.M. So we know that at least 900 plus peak morning hour car trips occurred, far more than the 686 figure Buckley used (see the EIR, page 341). Also, remember that at 3-4 P.M., there are another 800-900 vehicle trips. And this is before adding 80 students, 15-20 teachers and others, and before considering the added traffic when the Fashion Square spaces are gone.

Nor should we be surprised by Buckley's (erroneous) numbers. Counting hundreds of cars is not easy, and it is very difficult to supervise this kind o£ work. Mistakes should be expected and oversight is essential.

RESPONSE NO. 15-5

Please refer to Response to Comment Nos. 5-3 and 5-4 regarding the accuracy of the counts for the proposed project. Also refer to Section II, Corrections and Additions, of this Final EIR for updated information regarding the existing traffic counts and the project's estimated trip generation levels.

COMMENT NO. 15-6

Insofar as Stansbury and surrounding streets are concerned, the Planning Commission should keep in mind that the large "Barone's" development" at Stansbury and Ventura will be adding to the traffic described, along with the "Best Buy" and other projects of which you are aware.

RESPONSE NO. 15-6

As indicated in Response to Comment No. 5-2, the traffic analysis provided in Section IV.J, Transportation and Circulation, of the Draft EIR incorporated forecasted traffic increases due to ambient growth and related projects through the future study year (2014).[129] Twenty-nine related projects were evaluated for traffic-generated volume, as shown in

[129] *Also refer to Section II, Corrections and Additions, of this Final EIR for discussion of any operational impacts associated with a project buildout year of 2012; since the project's potential operational impacts are linked to the proposed student enrollment increase, an operational buildout year of 2012 would result if the alternative construction schedule is implemented.*

Table III-1, Related Projects, and Figure III-1, Related Projects Map, in Section III, General Description of Environmental Setting, of the Draft EIR. The evaluation included a project located at 14121 Ventura Boulevard, referenced as Map No. 17 (known as the Barones Project), and an electronics store to be located at 4500 Van Nuys Boulevard, referenced as Map No. 21 (Best Buy).[130] Thus, the projects referenced in the comment above have already been taken into account within the Draft EIR.

COMMENT NO. 15-7

In view of the traffic problems described, we feel that no additional students should be allowed and that the enrollment should be permanently capped at 750.

Thank you very much for your consideration,

RESPONSE NO. 15-7

As demonstrated by the Traffic Study and within Section IV.J, Transportation and Circulation of the Draft EIR, both amended in Section II, Corrections and Additions, of this Final EIR, with incorporation of mitigation measures, no significant traffic impacts would result from operation of the proposed project. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

[130] *Crain & Associates, correspondence from Rory Fancler, Transportation Planner, January 2007.*

LETTER NO. 16

Ellen Tutsch-Gregos
4865 Winnetka Ave.
Woodland Hills, CA 91364

COMMENT NO. 16-1

We are writing to express our strong support for the proposed Campus Enhancement Plan at the Buckley School in Sherman Oaks. This project is of utmost importance so that the school may provide a quality educational experience to its 750 students:

My daughter has been studying at the Buckley School for the past fifteen years and is currently a senior in high school. Our family has been very involved in volunteering for the school and supporting the school financially to the best of our abilities. We have also enjoyed participating in the numerous community service events the school hosts to help organizations in the Los Angeles area.

We have seen first hand how desperately the school needs more classroom space and improvements to the teaching spaces provided. It is a sad testament that our middle and high school administrators are not able to offer more courses, such as Mandarin, because the class spaces are utilized at 98% of capacity and there is simply no room available to add a new class. Despite these limitations, the school has an outstanding and committed faculty who educate our students with an extremely high level of academic standards.

Our children are the future leaders of the world and we hope that the Department of City Planning will support the efforts made by the Buckley School to provide a state of the art learning facility for K-12 students. As an active volunteer of the Parents' Association and past President and current member of the Board of Trustees, I am confident that the families of our 750 students are in strong support for this important project.

RESPONSE NO. 16-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 17

Peter & Frances Hovenier
3460 Camino de la Cumbre
Sherman Oaks, CA 91423

COMMENT NO. 17-1

We're writing in support of the Buckley School's revised campus expansion plan ("CEP"). As a neighbor to the Buckley School, we've been following the proposed expansion plans over the past few years with a lot of interest.

A couple of weeks ago we attended a Sherman Oaks Homeowners sub-committee meeting where the Buckley School and their architect presented the revised CEP to our local community. As a neighbor to the school, I was very pleased with the presentation on the revised CEP. The original plan did cause me some concern as the impact to the canyon setting seemed to be on the aggressive side. The new plan is dramatically improved and appears to fit very nicely into the existing environment. The improvements on both the removal of dirt (or lack there of) and reduced number of relocated trees are remarkable.

We live in a very unique and special setting here in the hills of Sherman Oaks, The Buckley School did a very good job creating a plan that fits nicely within this natural environment. From the presentation, it was clear that a lot of time and effort went into ensuring that the maximum height of the new buildings would not affect anyone's view or appear out of place on our canyon.

Finally, traffic in our neighborhood continues to be an issue and the newly revised plan should help to take a significant portion of the current traffic off of Stansbury and onto the Buckley campus. It was clear that the Buckley representatives recognized this traffic issue and worked to a [sic] create solution that would meet everyone's needs. Please contact us with any questions or comments.

RESPONSE NO. 17-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 18

Joe Howard
13160 Valley Vista Boulevard
Sherman Oaks, CA 91423

alamohoward@yahoo.com

COMMENT NO. 18-1

I am writing in support of the Buckley school and their campus Enhancement Plan in Sherman Oaks.

This school is the crown jewel of our neighborhood. It is doing a terrific job in its task of educating young people, and for many us here is Sherman Oaks, it is also our community school. Although nominally a private institution, many people in the area, like myself, have sent our children there. Outside of fine academic preparation, it has also been very adept in its goal of character training, accomplishing this more commendably than most schools that are religion-based.

This school deserves the support of everyone in the area. They are doing a fine job, and anything any of us can do to support them is helping to advance the interest of the entire community.

I respectfully request that that they receive the most favorable treatment in their current efforts to improve their circumstances, and that any plans that they submit be considered in light of their outstanding service to our commnity [sic].

RESPONSE NO. 18-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 19

Martin R. Irani
16266 Dorilee Lane
Encino, CA 91436

COMMENT NO. 19-1

I am writing to express my support for the Buckley School's Campus Enhancement Plan. As a Trustee of the Buckley School, I have been fully briefed from the onset on all aspects of the Plan. I firmly believe that the plan will benefit not only the Buckley School but the Sherman Oaks community as well. The project will be completed with minimal disruption to the neighborhood, and will vastly improve the educational experience of our children in the area.

All areas of the plan have been carefully evaluated and considered, and communication to all community groups has been a priority. In my experience, I have never seen a project as well prepared and thoroughly researched as this one.

Therefore, I am sending you my highest approval for the Buckley School Campus Enhancement Plan as a Trustee and Parent of the school, and as a resident of the Encino/Sherman Oaks area.

RESPONSE NO. 19-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 20

Elliot Klein
Hupp31@aol.com

COMMENT NO. 20-1

I live above the Buckley School at 3750 Beverly Ridge Drive. As a neighbor I am opposed to expansion of the school. Other private schools in the area have split the upper and lower grades. However if the "expansion" is approved i am definitely opposed to an increase in the hours of operation and an increase in the number of weekend days.

RESPONSE NO. 20-1

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Please refer to Section V, Alternatives, of the Draft EIR and Response to Comment No. 12-24 regarding the infeasibility of a split campus.

COMMENT NO. 20-2

The canyon where buckley is located is a natural amphitheater-- noise carries from the sports and other activities very clearly up to my house-- i am able to hear the coach of the football/sports team directing his players.

RESPONSE NO. 20-2

As discussed in Response to Comment No. 10-3, above, the possibility of canyon noise effects was addressed in Section IV.I, Noise, of the Draft EIR. Results of the analysis show a maximum noise increase of 2 dBA as a result of noise reflection from the canyon. As discussed in Section IV.I, Noise of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, no significant noise impacts would result from operation of the proposed project.

COMMENT NO. 20-3

When they put in their billboard/sign i got to watch it all thanksgiving 2005 (the light was vary [sic] annoying to watch it blink-- and i was the ONLY audience-- (i was finally able to get it shut off when they were not in session).

RESPONSE NO. 20-3

The existing pole-mounted, backlit, changeable message sign located near the campus exit, which has been a source of nighttime illumination, was removed in July 2006. Removal of

the sign was planned as part of the project, as discussed in Section IV.A, Aesthetics, of the Draft EIR, but was expedited in response to neighborhood concerns.

COMMENT NO. 20-4

Keeping in mind the canyon location -- noise and light should be kept at a minimum (NO light and NO Noise after hours) especially when the school is not in session. if they are granted a variance in height, one of the conditions should be No HVAC on the roofs-- the noise carries-- yes it will be new when installed--- however once it get [sic] old, as the equipment they now have-- it is noisy when it goes on around 5am in the morning.

RESPONSE NO. 20-4

Please refer to Response to Comment No. 12-10 regarding proposed lighting. Relative to rooftop equipment, most of the campus buildings would have rooftop air handlers that connect to the Central Plant and are appropriately screened from view to the extent feasible, with materials compatible with the design of the buildings.

As mentioned in the Draft EIR, rooftop equipment such as air conditioning units and air handlers, are required to comply with LAMC noise criteria. In order to further reduce possible impacts from stationary sources, the project Applicant has included the following project feature:

- In excess of Los Angeles Municipal Code (Chapter XI) requirements, HVAC units and all other mechanical equipment operations that have potential to introduce audible sounds beyond any property line shall be enclosed or otherwise attenuated such that equipment-generated noise levels do not exceed 50 dBA at any property line. For any mechanical equipment items required to operate between the hours of 10:00 P.M. and 7:00 A.M., such equipment items shall be designed such that equipment generated noise levels do not exceed 40 dBA at any property line.

Implementation of this project design feature would ensure that noise impacts associated with mechanical equipment would be less than significant.

COMMENT NO. 20-5

i [sic] am also worried about the 7 year construction-- especially on SATURDAYS/weekends and near holidays-- when school is not in session-- perfect time for not disturbing the students but putting all the "noise and troubles" of construction on the neighbors.

RESPONSE NO. 20-5

The commentor is incorrect with regard to the duration of construction. As indicated in the Section II, Project Description, of the Draft EIR, the three general phases of construction would occur over the course of approximately five years, spread out over an approximate six and a half year timeframe.[131] Furthermore, as discussed in Section IV.I, Noise, as amended in Section II, Corrections and Additions, of this Final EIR, construction noise impacts would occur intermittently during the construction period. The construction noise analysis assumes a worst case analysis in which the maximum amount of equipment located on-site would be operating simultaneously along the property line closest to sensitive receptors. Under real world conditions, this scenario would not take place on a regular daily basis.

[131] *Refer to Section II, Corrections and Additions, of this Final EIR for a correction to the duration of construction originally presented in the Draft EIR.*

LETTER NO. 21

Craig Knizek
4050 Stansbury Avenue
Sherman Oaks
818.981.7345

COMMENT NO. 21-1

I'm writing to let you know of my concerns over the Buckley expansion plans, and to request that you consider all the following questions and factors in denying their proposed CUP in its current form.

RESPONSE NO. 21-1

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Please refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project.

COMMENT NO. 21-2

The recent community outreach meeting I attended had various consultants hired by Buckley to perform various EIR studies. The Traffic study that they conducted during the month of October seemed severely flawed. The average number of cars they predicted that lined up from Buckley at any given time was only forty-five, and that the cars only barely line up to Valley Vista Blvd. This number is a gross under-representation of the amount of cars that I see on a consistent basis line up North from Buckley, extending north of the second stop sign on Stansbury Avenue at Roblar. My disbelief in hearing this statistical misrepresentation was disheartening. If that figure is utilized as the barometer, I am certain that subsequent miscalculations of traffic's impact on safety and mobility will occur. The methodology that they utilized doesn't take into account the impact Buckley's traffic has upon all the other traffic on the street. Sure, a portion of the cars turn west (or Right) once they reach valley Vista Blvd., but the commingling of the traffic is exacerbated by Buckley's morning traffic.

RESPONSE NO. 21-2

Crain & Associates conducted vehicular queuing counts and observations on two typical school days in October 2005 during the school peak morning and school peak afternoon time periods of 7:30 A.M. to 9:00 A.M. and 2:30 P.M. to 4:00 P.M. The counts and observations were conducted in five minute increments. During the morning, the longest queue occurred at approximately 8:00 A.M. and consisted of 35 passenger vehicles, of which 21 were on-site and 14 were on Stansbury Avenue. Afternoon observations generally found queues to be somewhat

longer and for a longer period of time. The longest queue in the afternoon occurred at approximately 2:50 P.M. and consisted of 46 passenger vehicles and one bus, of which 12 vehicles and one bus were on-site and 34 vehicles were on Stansbury Avenue. The off-site queue included 31 vehicles on Stansbury Avenue and three vehicles wrapped around the corner onto the west leg of Valley Vista Boulevard. No Buckley student, parent or faculty/staff vehicles were observed queuing north of Valley Vista during these periods. In addition, no events or activities occurred on either count day that would indicate that the queuing observed was not typical.

As discussed in Response to Comment Nos. 7-2 and 12-3, above, the existing traffic and projected future traffic at the study intersections and on the residential street segments were adequately analyzed and disclosed.[132] The Traffic Study, provided as Appendix L to the Draft EIR and amended within this Final EIR, was approved by LADOT in their assessment letters dated October 18, 2006 and July 11, 2007.[133] In order to eliminate the off-site vehicular queuing that typically occurs on Stansbury Avenue, the existing front parking lot at the northeastern portion of the site would be redesigned to provide adequate site access and circulation for the visitor parking lot, the new two-level enclosed parking facility, and the new arrival plaza. The new parking facility will provide a queuing capacity for approximately 40 vehicles on the lower level and approximately 29 vehicles on the upper level, for a total of 69 vehicles. Vehicles in queue for peak drop-off or pick-up activities would enter the campus via Stansbury Avenue and either continue straight to enter the upper level of the parking facility or turn left to enter the lower level of the parking facility. Both levels would feature a single queuing lane, with supervised loading/unloading activities occurring toward the head of the lane. After completing the pick-up or drop-off activities, vehicles would exit the parking facility. The total queuing capacity of 69 vehicles would be adequate to accommodate the School's anticipated typical queuing demand of 46 vehicles, as well as most increases that may sometimes arise due to fluctuations in demand.[134] This queuing capacity, in conjunction with the proposed TDM Plan, would also accommodate the proposed 80-student enrollment increase and the proportionate increase in faculty/staff members.[135]

[132] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the traffic counts and project impacts to residential street segments.*

[133] *LADOT's letter is incorrectly dated therein as June 11, 2007, but was actually issued on July 11, 2007.*

[134] *Refer to Appendix L, Traffic Impact Study for Proposed Buckley School Campus Enhancement Plan, prepared by Crain & Associates, March 2006, as amended in Section II, Corrections and Additions, of this Final EIR for an analysis of typical queuing demand.*

[135] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the TDM Plan.*

COMMENT NO. 21-3

We're requesting that Buckley implement an increased carpool/busing program to actually reduce traffic, not keep it the same in light of their increased enrollment.

RESPONSE NO. 21-3

Per Mitigation Measure J-4, as revised within this Final EIR, the School will implement a Transportation Demand Management (TDM) Plan. The TDM Plan shall achieve a reduction of at least 75 project trips during the A.M. peak hour, resulting in no increase to the existing A.M. peak-hour trip generation level, and a reduction of at least 4 project trips during the School P.M. peak hour. In addition, although not required as mitigation, the School has volunteered to reduce the project daily trip generation of 278 vehicle trips by at least 40 percent (i.e., a reduction of at least 111 trips). To further reduce impacts, the Applicant also volunteers to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan.[136] Refer Response to Comment Nos. 12-4 and 12-7 for further discussion.

COMMENT NO. 21-4

I am also opposed to the conditions of Buckley requesting to operate beyond six pm, and to host up to twenty-four weekend events in which the campus can accommodate more than 100 people. A school year only has (approximately) 36 weekends. If they increase their approved usage from 12 to the requested 24, that means that two-thirds of their school year will extend into a six-day week. For a large school in a residential area that already suffers from their traffic and noise, this is unacceptable. There are no compelling academic/educational reasons for such an increase in scope of their operating conditions.

RESPONSE NO. 21-4

Refer to Response to Comment No. 5-1 regarding the need for the project and the compatibility of the project with surrounding land uses. The School has proposed that school facilities open beginning at 7:00 A.M., as currently allowed, with school instruction beginning at 7:30 A.M. and ending by 4:00 P.M. during the regular academic year.[137] With the additional time, the School proposes to stagger the start and end times for classes at the Lower, Middle and Upper Schools during the regular year, with the stated intent to minimize overlap of student arrival and departure times in order to reduce peak traffic entering the campus at any one time.

[136] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the TDM Plan.*

[137] *The School's proposed hours of operation, described in part herein, are subject to the approval of the decision-makers and would be imposed as binding conditions of approval.*

After school activities would follow regular instruction, continuing until 8:30 P.M. Such activities are currently permitted until 8:00 P.M., and the extension to 8:30 is intended primarily to support the School's athletic programs (e.g., for after school practices and matches). These expanded operating hours are proposed to advance several of the School's project objectives, such as to eliminate existing scheduling conflicts and maintain on-site athletic programs. The occurrence of school activities during evening hours was taken into account in the impact analyses provided in the Draft EIR; as shown therein, school operations would not result in any significant, unmitigable environmental impacts. More specifically, associated vehicular trips to/from the campus in the evening would occur outside of peak traffic hours, parking demand would be limited, and noise generation would be minimal, and as such, evening impacts on the neighborhood would be limited. Furthermore, school activities currently occur during some evening hours; thus there would be little change from existing conditions. Additionally, relative to evening activities and events occurring until 10:30 P.M. where parents, visitors and/or guests are in attendance, the School has volunteered to reduce the current allowance from 10 weekday nights each month to 8 weekday nights, and to specify that two of those eight activities/events must be limited to fewer than 100 people. Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding extra-curricular activities and special events, the School's operational hours, and associated impacts.

With respect to the comment regarding the School's request for an increase in weekend usage, as demonstrated in the EIR analysis, project development would not alter the overall character of the campus or the surrounding neighborhood. While the project would allow for an increase in the number of weekend activities, none of the operational characteristics of the project would result in a significant environmental impact (specifically, there would be no operational noise, traffic or parking impacts). To clarify, extra-curricular activities occurring on the 21 permitted weekend days would consist of those activities where parents, visitors and/or guests are in attendance; smaller activities involving only students, faculty, administration and/or parent volunteers assisting with the activity (but not including visitors or guests) may continue to occur on all other weekend days from 8:00 A.M. to 6:00 P.M. and shall be limited to a maximum of 100 people and limited to indoor activities on Sunday. Refer to Section II, Corrections and Additions, of this Final EIR for further information regarding this clarification.

COMMENT NO. 21-5

I could not find any language in the CUP, which stipulated any restitution that school would have to make if they cannot meet their construction schedule, and have to exceed the allotted duration of time to complete their building. In other words, it is easy to put forth a schedule that on paper seems reasonable to accomplish. But in the real world of fund-raising, construction, weather, etc, there is [sic] bound to be overages. The community will once again suffer if they have to ask for and receive extensions to their construction period.

RESPONSE NO. 21-5

The Draft EIR prepared for the project evaluates construction impacts in light of the proposed timeframe for buildout of the project. As discussed therein, construction would occur in three phases over the course of approximately five years, spread out over an approximate six and a half year timeframe.[138] Additionally, as discussed in Section II, Project Description, a period of approximately one year with no construction is currently planned subsequent to completion of Phase 1. However, for purposes of a conservative analysis, a potential scenario with either consecutive implementation of Phases 1 and 2 or a slight overlapping of Phases 1 and 2 has been analyzed where appropriate (e.g., the construction traffic and air quality analyses).

As discussed in Section II, Corrections and Additions, of this Final EIR, the School is proposing a flexible construction schedule with phasing alternatives, to allow the School to most efficiently address its project objectives and respond to community concerns, in light of available resources at the commencement of construction. Under the alternative phasing schedule, construction of the project would still be completed in three primary phases over the course of approximately five years, spread out over an approximate six and a half year timeframe. However, under this scenario, Phase 2 of construction would precede Phase 1. Under this new scenario, a period of approximately one and a half years with no active construction would occur subsequent to completion of Phase 2 and prior to commencement of Phase 1. Completion of Phase 1 would coincide with the two month preparatory period for Phase 3; this slight overlapping of Phases 1 and 3 is similar to the potential overlapping of Phases 1 and 2 that was evaluated where appropriate in the Draft EIR (e.g., the construction traffic and air quality analyses) in order to provide a conservative analysis.

As also discussed in Section II, Corrections and Additions, of this Final EIR, in response to community concerns regarding the duration of the construction period and in an effort to ensure that the project is completed as expeditiously as possible, the School has proposed extended construction hours during two four-month periods of Phase 2 of construction, occurring outside of the regular academic year. During Phase 2, construction days and hours would be Monday through Friday, 7:00 A.M. to 5:00 P.M. each day from September 2nd to April 30th; Monday through Friday, 7:00 A.M. to 7:00 P.M. from May 1st to September 1st; and Saturday, 8:00 AM to 5:00 P.M. throughout the year. In addition, between May 1st and September 1st of Phase 2, once a building is fully enclosed, interior construction activities may continue until 9:00 P.M. on weekdays and 6:00 P.M. on Saturday. The extended hours during the summer months of Phase 2 would allow for additional construction time, as needed, to complete specific tasks, allow additional time to address unforeseen issues, and maintain the integrity of the overall construction schedule. This type of flexibility in the construction schedule would also permit

[138] *Refer to Section II, Corrections and Additions, of this Final EIR for a correction to the duration of construction originally presented in the Draft EIR.*

construction crews to accomplish as much as possible during the summer months while school is not in session, which could in turn improve construction coordination and reduce traffic congestion when classes resume in the fall and a full student body is present on-site.

The construction timeline established in the EIR is based on reasonable, conservative assumptions, in compliance with CEQA Guideline Section 15151, which states that "the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." Issues regarding fund raising and the possibility of weather delays are beyond the scope of the Draft EIR. The comment will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 21-6

Lastly sir, I beg you to consider the law of unintended consequences when assessing which conditions that have to modify to gain your approval. Clearly all the traffic that traverses up and down Stansbury and-Valley Vista is not related to the Buckley school. But since they state that they are indeed Sherman Oaks' largest employer, and we know the number of students and teachers that attend the school on a daily basis, we can fairly asses [sic] that their presence and operations do contribute a large portion of the traffic. What's more, they impact that existing traffic of people traveling to work and other schools. The problem will arise when additional traffic in the form of big lumbering construction trucks slowly drive up and down the street. Demolition, excavation, concrete, steel rebar, lumber and the workers needed to perform all these tasks do not drive Toyota Prius'. They drive belching 8-wheelers that accelerate slowly as they turn off Ventura onto Stansbury. They accelerate slowly as they come to a full stop at Dickens. Then once again, they accelerate slowly as they move away from the stop sign at Greenleaf. Then they must navigate the narrowed path created by the persistent film/television production filming with large RV Honey wagons and police escorts. They stop once again at Roblar, then up a short distance to Valley Vista, before beginning their final ascent into the Buckley school. I suspect that at some time, some driver, perhaps an impatient Buckley parent who's already driven through traffic on the 405 from Brentwood to get here, or somebody trying to get to work via Beverly Glen, feels that the construction truck is moving too slowly, and that they can move around them. It's an accident waiting to happen. Perhaps Buckley isn't directly responsible. Perhaps no city official can be held accountable either, but as a citizen who lost my father and young sister to a teenage driver going too fast, past an intersection where our then City Councilwoman Joy Picas ignored community please [sic] for a stop sign, I am particularly sensitive to the distance [sic] possibility of this tragedy happening. The erection of that stop sign the day after my father and sister's death was actually added insult to the life-changing injury.

Clearly progress will engender some side effects. It just doesn't seem to me that all the smart people that Buckley has hired, nor all the smart people working for the city, nor in the City Councilman's office, has considered all the measures to put into place to try to stop this one

potential instance where a tragedy can occur. And if I'm wrong, so be it. then [sic] perhaps Buckley and their student body may have to do with less. But I'd hate to be right.

Thank you very much for your time and consideration.

RESPONSE NO. 21-6

Please refer to Responses to Comment Nos. 9-1, 12-4 and 12-6 regarding potential traffic impacts associated with construction and operation of the project, as well as Section II, Corrections and Additions, of this Final EIR for further discussion and updated information. This comment is acknowledged and will be referred to the decision-makers for review and consideration.

LETTER NO. 22

Kathleen Laccinole
4041 Stansbury Avenue
Sherman Oaks, CA 91423

COMMENT NO. 22-1

Enclosed please find a copy of a letter I wrote to my local councilman, Jack Weiss, regarding my concerns over the Buckley School expansion proposal.

This letter was written in response to the Environmental Impact Report I received from your office, information disseminated at recent SOHA meetings, as well as my simple experience living on Stansbury Avenue in the vicinity of The Buckley School.

In short, I feel this expansion would only make a bad situation worse and sincerely hope you will consider my letter when assessing the situation.

Please feel free to contact me with any questions or comments.

Thank you for your time and consideration.

RESPONSE NO. 22-1

This comment does not raise specific environmental information related to the project, but is acknowledged and will be forwarded to the decision-makers for review and consideration. Please refer to the responses provided in Letter No. 23 for further discussion of the issues raised by the Commenter.

LETTER NO. 23 (Sent as an Attachment to Letter No. 22)

Kathleen Laccinole
4041 Stansbury Avenue
Sherman Oaks, CA 91423

COMMENT NO. 23-1

I write to you to express my serious concerns over the Buckley School expansion proposal. While I'm told writing you is a "waste of time" as you already have your up your mind [sic] regarding this proposal, I still feel compelled to express my sadness and distress. Frankly, this entire situation has made me lose all confidence in my local government.

Simply stated, Buckley is a big business - and big businesses do not belong in residential neighborhoods.

RESPONSE NO. 23-1

Please refer to Response to Comment No. 5-1 regarding the appropriateness of schools in residential neighborhoods. It is noted that The Buckley School is not a for-profit business, but rather a not for profit educational/institutional use. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration

COMMENT NO. 23-2

They are budgeting FIFTY MILLION DOLLARS for a project that will take at minimum six years, and most likely longer. In comparison, the Laurence School doubled the size of their campus, including a state-of-the-art gymnasium, theater, library, sports field, etc... for four million dollars. Their construction took a little over a year. In short - the Buckley plan can and should be scaled way back.

RESPONSE NO. 23-2

Please refer to Response to Comment No. 5-9 regarding the proposed construction timeframe. As discussed therein, construction would occur over the course of approximately five years, spread out over an approximate six and a half year timeframe.[139] Please also refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project, as well

[139] *Refer to Section II, Corrections and Additions, of this Final EIR for a correction to the duration of construction originally presented in the Draft EIR.*

as the compatibility of the project, in terms of land use, design and School operations, with the surrounding neighborhood.

COMMENT NO. 23-3

Better yet, the campus should be split. Two of the top private schools in the area (Oakwood, Harvard-Westlake) have successfully split their campuses. In fact, as I'm sure you know, the Harvard-Westlake middle school is on the West Side. And still, people clamor for acceptance to that school.

RESPONSE NO. 23-3

Please refer to Response to Comment No. 12-24 and Section V, Alternatives, of the Draft EIR, regarding the infeasibility of a split campus.

COMMENT NO. 23-4

I am a single mother who owns a home (with a mortgage) on Stansbury Avenue, just north of Valley Vista. At present, the Buckley school traffic is a constant source of struggle for my family and me. It is nearly impossible for me to get in and out of my driveway with cars racing to get to the school. Mind you, I have two small children strapped into car seats in back, and I am always fearful of a collision. Never mind the fact that we don't have sidewalks, and because of the amount of traffic, cannot allow our children to ride their bikes, take walks, or play in the street. Once a car full of Buckley students thought it was funny to "pretend" they were going to hit me with their car as I crossed the street. They laughed and sped away - I was seven months pregnant and terrified.

Two times a day my driveway is completely blocked by Buckley cars lined up waiting for drop off or pick up. Daily, there are parents parked in front of my home, "drivers" standing on my front lawn smoking, reading, talking on the phone - all waiting to pick up their kids from school. I regularly have trash thrown onto my lawn, and cigarette butts into my garden. Would you please explain this to my children?

RESPONSE NO. 23-4

As discussed in Response to Comment No. 12-4, a residential street impact analysis was conducted to evaluate the potential impacts of project traffic on residential streets near the project site. Stansbury Avenue north of Valley Vista Boulevard and Stansbury Avenue south of Valley Vista Boulevard were included as study residential street segments. As described in Section II, Corrections and Additions (Subsection G), of this Final EIR, project operations would not significantly impact these or any of the other analyzed residential street segments. With implementation of the project mitigation measures, project impacts at the study intersections

would also be less than significant. In addition, the new arrival plaza and enclosed parking facility, together with the drop-off/pick-up queuing plan, would ensure that vehicular queuing and on-street parking attributable to the School do not occur on Stansbury Avenue and other residential streets in the neighborhood. It is noted that many of the peak hour vehicles traveling on Stansbury Avenue north of Valley Vista Boulevard are local commuters traveling between Ventura and Beverly Glen Boulevards. As discussed in Section IV.J, Transportation and Circulation, of the Draft EIR, Mitigation Measure J-6 would involve improvements to the southbound Stansbury Avenue and eastbound Valley Vista Boulevard approaches to the Stansbury/Valley Vista intersection such that one left-turn/through shared lane and one right-turn-only lane would be provided. These improvements would serve to alleviate both School-related and local commuter queuing at the intersection.

COMMENT NO. 23-5

You say you support the Buckley expansion because you are "in favor of education." This is not about education - this is about luxury education for the wealthy. My daughter does not attend Buckley because I can't afford it. She attends a different local private school, which costs much less - and yet still manages to provide her with an equal if not better education than Buckley. A bigger campus and parking structure does not make for a good education.

RESPONSE NO. 23-5

Please refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project.

COMMENT NO. 23-6

Aside from what this proposed expansion will do to our neighborhood from increased student body and staff traffic, the danger of construction traffic, the noise SIX DAYS A WEEK, the nitrogen oxide levels - the saddest part of all, for me, is that my daughter's entire college education is my house. We live modestly, and I've always planned to use the money from my house to finance her education. If this expansion goes forward it will devastate my home value as well as my daughter's college options.

RESPONSE NO. 23-6

Regarding property values, CEQA Guidelines Section 15131(a) states that economic effects shall not be considered as significant impacts on the environment, except insofar as they may cause physical changes to the environment related to the project. As such, the effect of project development on off-site property values is beyond the scope of this EIR. CEQA Guidelines Section 15145 further prohibits speculative analysis, which any analysis of effects on

future property values would be considered. In any case, operation of the project would not result in any significant physical impacts on adjacent uses.

Regarding the other issues raised, the Commenter is referred specifically to Sections IV.J, Transportation and Circulation; Section IV.I, Noise; and Section IV.B, Air Quality, of the Draft EIR, as well as Section II, Corrections and Additions, of this Final EIR for a thorough discussion of each of these issues.

COMMENT NO. 23-7

If you cannot support the residents of Sherman Oaks, your constituency, with regards to this matter, you should, at the very least, recuse yourself from this issue. I was recently told that you've accepted $9,000 from Buckley's law firm, which would lead anyone to believe you are biased.

RESPONSE NO. 23-7

This comment does not raise specific environmental information related to the project, but is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 23-8

I am pro education. I put my heart and soul into my children's schooling. I come from a family of teachers, and spent many years myself as an elementary school music teacher. The Buckley expansion is about ego and prestige - not education. It's yet another example of the big guy with the big money beating out those of us who don't have a voice because we don't have the power, fame, or dollars it takes to make ourselves heard.

Shame on you for not listening to the little guy.

RESPONSE NO. 23-8

Please refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 24

Paul Layton
paul@tssla.com

COMMENT NO. 24-1

My Name is Paul Layton. I Live [sic] on Stansbury Ave. Sherman Oaks.

I have two Small [sic] children.

Buckley School is our neighbor.

This school in no way complies with the current conditional use permit.

The impact of their current operation has an. immense negative impact on my family.

I have written to you before so I am sure you understand the details that make our lives difficult.

Traffic volume is the biggest problem.

Please do not approve the modification of their current CUP to allow more students.

The current seven year building plan is an improvement on prior plans. Please keep allowed building expansion within reason.

Thank you for your consideration

RESPONSE NO. 24-1

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Each of the environmental issues mentioned in the comment have been addressed in the Draft EIR and appendices. Specifically, please refer to Section IV.J, Transportation and Circulation, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, regarding traffic issues. Please also refer to Response to Comment No. 5-9 regarding the proposed construction timeframe. The specific comment related to the School's compliance with its existing CUP does not raise specific environmental information related to the project, but is acknowledged and will be forwarded to the decision-makers for review and consideration

LETTER NO. 25

Henry Lipson
4112 Stansbury Ave.
Sherman Oaks, CA 91423

COMMENT NO. 25-1

I have serious concerns regarding the dire effects to the health of residents of the community and the students and staff of the Buckley School that will be created by the five to seven years of construction proposed in the Buckley School Campus Enhancement Plan. My wife and I live at 4112 Stansbury Ave., two blocks north of the school. We have lived here for over thirty years and intend to remain living in our home. The particulate pollution created by the diesel powered construction equipment and diesel trucks delivering supplies and equipment will create a major health problem for all those in the area.

In an article in the Los Angeles Times of December 6, 2006 under the headline, "Dire health effects of pollution reported", two recent studies were cited documenting the "severe health hazards of exposure to the soot in diesel emissions". Due to the location of the school at the mouth of a canyon surrounded by a residential community the impact of the clouds of soot created by the diesel engines would be especially severe on the students and residents. Although the report refers to short-term significant and unavoidable construction impacts, the scope of the expansion plan would result in major periods of construction during the five to seven years necessary to complete the project. I do not consider this a short-term problem and if it is unavoidable the proposed expansion should be dropped and an alternative should be adopted.

RESPONSE NO. 25-1

As discussed in Section II, Project Description, of the Draft EIR, construction for the project would be completed in three phases totaling approximately five years.[140] In order to keep the School in operation during construction, the three phases would be spread out over an approximate six and a half year timeframe.

As discussed in Section IV.B, Air Quality, of the Draft EIR, the greatest potential for toxic air contaminant (TAC) emissions during construction would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a

[140] *Refer to Section II, Corrections and Additions, of this Final EIR, for a correction to the duration of construction originally presented in the Draft EIR.*

person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given that the majority of grading and excavation activities would occur intermittently during Phase 2, the proposed project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions with no residual emissions after construction and corresponding individual cancer risk. As such, project-related toxic emission impacts during construction would not be significant.

In addition, as discussed in the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, during construction of the project, maximum regional emissions would exceed the SCAQMD daily significance thresholds for NO_X even with incorporation of all feasible mitigation measures. Therefore, regional construction emissions resulting from the project would result in a significant short-term impact. In addition, construction-related PM_{10} levels would exceed the localized concentration increase during Phase 2 site preparation activities, also resulting in a significant and unavoidable impact during construction. The construction air quality analysis provided in the Draft EIR and amended in this Final EIR conservatively assumes that the maximum amount of equipment located on-site would be operating simultaneously.

In addition, as discussed in Response to Comment 5-8, above, the Buckley School Campus Enhancement Plan has evolved from a planning and design process dating back to 1997 that has included extensive community input. The project has undergone numerous revisions over the years and the School has continued to work with the community to address their concerns while accommodating the School's educational needs. Most recently, a previous plan (described in the November 2004 EAF/Draft Initial Study and the NOP dated January 12, 2005) was revised to reflect the current proposal in response to community concerns regarding construction impacts and soil export. The current plan reflects a substantially reduced amount of grading when compared with previous proposals for the site and will result in nominal (i.e., less than 1,000 cubic yards) soil import and/or export.

COMMENT NO. 25-2

Two alternatives were suggested, splitting the campus or moving the entire school to another location, and I believe that these should be fully explored.

RESPONSE NO. 25-2

A thorough analysis of feasible project alternatives is provided in Section V, Alternatives, of the Draft EIR, along with a discussion of those alternatives that were considered but rejected as infeasible, including an Alternative Site and a Split Campus Alternative. Please refer to that analysis, as well as the discussions provided in Response to Comment Nos. 12-24 and 12-45.

LETTER NO. 26

Maria Pavlou
4737 Burnet Ave.
Sherman Oaks, CA 91403

COMMENT NO. 26-1

I am writing this letter so that I can express my admiration for all that you and your staff do so that we may have a vital, safe, and progressive city. In having recently attended Land Use meetings and Sherman Oaks Homeowners' meetings, I have been appalled at how abusive and combative people can be. Your deputies are very impressive in their handling of these meetings, but I just wish we could have these meetings without all the ranker. In one, recent, homeowner's meeting there was a particularly high amount of squabbling over the new plans for The Buckley School. I don't believe anyone in favor of this project, would have dared state their feelings in such an atmosphere. I sat next to a Dr. who would not let anyone answer his questions and when I asked him to let the school attorney speak he was aggressive and rude to me. I now understand why many people do not come to these meetings. These meetings, however, have made me want to express my views on the Buckley Project to you.

I have sat and listened as a group of Stansbury residents battered and insulted school personnel on issues that, it seems to me, the school has addressed and resolved for these residents, but none of those in opposition seemed to listen. These residents continued to argue over issues such as traffic, emergency response plans, noise, fossil handling, etc.

RESPONSE NO. 26-1

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

COMMENT NO. 26-2

The school has shown these residents, multiple times, that the new school plans will bring in all the cars (for school drop off and pick up) on site, thus mitigating car congestion on Stansbury. However, the arguing continues about the traffic congestion this project will cause; this arguing from the very same people that state they drive Beverly Glen to get to work. They, therefore, cause traffic congestion on Valley Vista and Beverly Glen. Is that not a bit hypocritical?

RESPONSE NO. 26-2

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

COMMENT NO. 26-3

They complain that any emergency, at the school, will cause fire trucks to go up surrounding streets that would block residents from leaving their homes. Of course, none of these people seem to realize that if they had a heart attack and called 911 that their neighbors would probably have a hard time exiting on their narrow streets, once emergency vehicles responded to their own emergency.

RESPONSE NO. 26-3

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Also refer to Response to Comment Nos. 7-10, 12-8 and 12-39 regarding emergency access for the project.

COMMENT NO. 26-4

Also interesting is the fact, that except for one or two residents, all these Stansbury neighbors have moved into the neighborhood well after Buckley School was established. They purchased their homes knowing there was a school at the end of Stansbury.

RESPONSE NO. 26-4

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

COMMENT NO. 26-5

I am not a Stansbury resident, but I am a Sherman Oaks resident. I feel we need to always keep improving our city. We should certainly encourage the continual improvement of our private schools. If the immediate neighbors of schools in LA had their way, we would have no Harvard Westlake, no Marlborough, no Buckley and no other private schools that reside in residential neighborhoods. These schools bring a great deal of prestige to a Community. These schools all need to be continually upgraded in order to stay competitive. We all benefit from having these premier schools in our city; Harvard-Westlake is in the top 5 nationally. How can we not encourage these schools to improve their facilities, in an age when the world has become so competitive? Especially, since our public schools, that were once nationally ranked, are no longer thus ranked. This project is good for our City, and our kids. Please do not let these

ridiculous people who are so narrow in their views stop the expansion and improvement of Buckley or any other school in our city. Especially since these schools try so hard to mitigate the issues concerning their neighbors. We should all try to look at the bigger picture and not focus only on what is best for ourselves. Being a member of a community gives us each a responsibility to help that community grow and progress into the best it can be.

In order to be the best, we need to have the best. Please continue to support this project, so our kids and community can look forward to a bright future.

RESPONSE NO. 26-5

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 27

Charles Perez, Owner
PDI
Paul Davril, Inc.
5401 S. Soto Street
Los Angeles, CA 90058

COMMENT NO. 27-1

I am writing you to express my support for The Buckley School Campus Enhancement Plan which is currently under review by your office. As a longtime resident and business owner in Los Angeles I know firsthand the importance of having excellent schools to educate our children. Nothing is more important than a quality education for students today who will be our leaders tomorrow. While Buckley delivers a high quality education, their buildings are over forty years old and they lack the classroom space to expand educational opportunities.

Buckley's plan to expand and renovate the campus is well thought out and has undergone many changes in response to neighborhood concerns. Being a good neighbor is a priority for the school and it works hard at this. The school is an important economic contributor to Sherman Oaks as the largest employer in the area and many of the families live, work and shop in Sherman Oaks. Buckley also participates in the community with everything from students contributing thousands of hours of community service each year, to the school helping to sponsor the local street fair. The campus is an idyllic and safe setting to nurture young minds and like many other public and independent schools it should be allowed to improve so it can stay at its current location. Schools should not be relegated to industrial parks, they belong in residential neighborhoods creating an important social fabric of our society that places the highest priority on education.

Thank you in advance for your consideration.

RESPONSE NO. 27-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 28

Paul Roman
4230 Stansbury Avenue #304
Sherman Oaks, CA 91423

COMMENT NO. 28-1

I have been a resident of Sherman Oaks for the past 12 years. I have lived in the vicinity of The Buckley School for 10 years and on Stansbury Avenue proper for the past year and a half.

Prior to living on Stansbury, I had heard stories of how The Buckley School caused so many difficulties for the Stansbury residents, such as noise, excessive traffic and students parking off campus. I can honestly say I have experienced none of the alleged intrusions on our neighborhood's harmony.

In fact, I have found Buckley to be amazingly non-intrusive on the neighborhood. With my work schedule, I am often home during school hours, so I am not absent during the school's busiest times and have been able to observe the activity.

The Buckley school is a beautiful facility that enhances our neighborhood; it attracts refined families and has greatly considered the well-being of the Sherman Oaks community in their planning and has conformed to many of the neighbors' concerns.

I hope you find my comments helpful. Please feel free to contact me if you have any questions, and allow me to thank for your time.

RESPONSE NO. 28-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 29

The Randy Simon Family
SIMONRANDY@aol.com

COMMENT NO. 29-1

I am GRAVELY concerned about the Buckley School's plans for expansion, and how they will impact me and my family, since we live down the street from the school on Stansbury Ave. I recently attended a presentation by the school, and I don't see how they could expect us to endure this. Specifically-

Traffic- the school is poorly located on a cul de sac, with only one main street in and out (ours). Already traffic is a nightmare- I have a terrible time getting in and out of my driveway daily during the school's opening and closing times and I live two blocks away. At the presentation they had someone who claimed to have done a traffic study. He said at the worst he saw 45 cars backed up to the corner of Valley Vista. This is simply not true- cars regularly back up two blocks north of Valley Vista, to Roblar. Hence I strongly question the competency and accuracy of his "study."

RESPONSE NO. 29-1

Please refer to Response to Comment No. 21-2 with regard to the methodology used to evaluate access.

COMMENT NO. 29-2

Furthermore, the school claims all their construction will "only" increase traffic 20% for "several years." I don't believe this- nor should we be expected to tolerate any more traffic. We need a 20% reduction, not an increase!

RESPONSE NO. 29-2

Please refer to Response to Comment Nos. 9-1 and 12-6 regarding construction traffic impacts.

COMMENT NO. 29-3

Construction- their proposal would add something like 60,000 square feet of space (the equivalent of two Ralph's supermarkets) and is estimated to take at least SIX YEARS. Plus we all know that construction usually tends to take much longer than first anticipated. It would

involve TONS of machinery, construction materials, laborers, etc. being trucked up our residential street on a daily basis.

Almost everyone in our neighborhood has children, and there are no sidewalks. So this is an extremely unsafe situation.

RESPONSE NO. 29-3

Please refer to Response to Comment No. 5-9 regarding the proposed construction timeframe and associated mitigation. As discussed therein, construction would occur over the course of approximately five years, spread out over an approximate six and a half year timeframe.[141] As also discussed, mitigation measures would be implemented during construction to ensure safe conditions and minimize conflicts with pedestrians and motorists, as further detailed in Section IV.J, Transportation and Circulation, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR. Please also refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project, as well as the compatibility of the project, in terms of land use, design and School operations, with the surrounding neighborhood. Response to Comment No. 12-42 above addresses construction haul trips. As indicated, based on the traffic analysis provided in the Draft EIR, the only street segment to be significantly affected by construction trips would be Stansbury Avenue south of Valley Vista Boulevard.

COMMENT NO. 29-4

And the noise would be unbearable. The school is located in a canyon, which carries sound - I can hear a dog barking blocks away.

RESPONSE NO. 29-4

As discussed in Response to Comment Nos. 10-3 and 20-2, the possibility of noise canyon effects was taken into consideration in the Draft EIR. A full copy of the canyon effects sound reflection test is provided within Appendix J of the Draft EIR. As disclosed within the Draft EIR, construction noise impacts would be significant and unavoidable with incorporation of all feasible mitigation measures. However, no significant noise impacts would result from operation of the proposed project.

[141] *Refer to Section II, Corrections and Additions, of this Final EIR, for a correction to the duration of construction originally presented in the Draft EIR.*

COMMENT NO. 29-5

Additionally, their architect is planning buildings up to 55 feet high (which greatly exceeds the current height limitation of roughly 35 feet) in a residential neighborhood of mostly single story homes.

RESPONSE NO. 29-5

Please refer to Response to Comment No. 5-5 regarding the proposed building heights, and Response to Comment No. 12-19 regarding the number of stories proposed and project building density.

COMMENT NO. 29-6

PLEASE HELP US! I have VERY little faith in, Councilman Jack Weiss' impartiality did you know that Buckley's law firm donated $9,000 to his campaign? And I'm sure he's received more $$$ from other Buckley supporters.

RESPONSE NO. 29-6

This comment does not raise specific environmental information related to the project, but is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 29-7

THE SOLUTION- Buckley should split their campus! We all know it is an extremely affluent student body, and this would not be a hardship. This entire situation is about convenience, ego, prestige and income - not cost. (They plan to spend $50 million dollars.) As a comparison, the Laurence School recently doubled its size, including a new state-of-the-art gym and theater, library, classrooms, and athletic field (with artificial turf) for $4 million, built in roughly 12 months. I don't believe for a minute this expansion is about quality of education. Buckley is doing just fine . . .

RESPONSE NO. 29-7

Please refer to Response to Comment No. 12-24 and Section V, Alternatives, of the Draft EIR regarding the infeasibility of a split campus. Also refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project, as well as the compatibility of the project, in terms of land use, design and School operations, with the surrounding neighborhood. Please also refer to Response to Comment No. 5-9 regarding the proposed construction timeframe.

COMMENT NO. 29-8

When Buckley originally received permission to locate in our neighborhood, they promised to cap their enrolment at roughly 360 students. They now have 750, and want to add 80 more.

RESPONSE NO. 29-8

The commentor is incorrect regarding the enrollment originally authorized under the School's CUP and appears to be referring to a CUP granted to a different school, which was never utilized, prior to Buckley's acquisition of the project site. In September 1958, the City Planning Commission approved a Conditional Use request by the Argyll Academy to operate a co-educational Episcopal day school with a permitted enrollment of 400 students. In early 1959, the church requested termination of the proceedings and City Plan Case no. 9287 was closed in February 1959.

On March 11, 1965, the City Planning Commission approved City Plan Case No. 17967, for operation of the coeducational Buckley School with a maximum enrollment of 750 students. This was a completely separate case from the Argyll Academy. In the Planning Department staff report to the City Council for the Buckley School case, the staff stated "as to the previous approval of this property for a school for 400 students under City Plan Case No. 9287 it should be noted that the 400 students capacity was the enrollment then requested and the fact that approval was granted for this number does not establish any precedent nor does it have a direct bearing on the present case." Consequently, the Buckley School was originally approved for 750 students.

COMMENT NO. 29-9

Other schools have split their campuses in order to expand, like Oakwood, and Harvard-Westlake, and the argument that Buckley can't find a location just isn't true. There have been many reasonable locations that have been available on which Buckley has passed. In fact, as I write this letter, there's a large vacant parcel at the end of our street, where Stansbury meets Ventura Blvd. Another example would be the large parcel where Steven's Nursery recently closed.

Again, PLEASE HELP US!

Thank you VERY much!

RESPONSE NO. 29-9

Please refer to Response to Comment No. 12-24 regarding the infeasibility of a split campus. The two properties referenced in the comment as potential sites for a second Buckley campus are each too small to accommodate any one division of the School (Lower, Middle or Upper School) and related facilities in its entirety. Such properties are intended for commercial uses and may not be appropriate for educational facilities and school activities. Further, both properties have been proposed and approved for other commercial/mixed-use development. Please refer to Section III, Environmental Setting, of the Draft EIR for a discussion and map of related projects proposed or underway throughout the surrounding area.

LETTER NO. 30

Laurel & Chad Tew
Director of Admission
Viewpoint School
23620 Mulholland Highway
Calabasas, California 91302

COMMENT NO. 30-1

Please accept this as a testimonial from a neighbor of the Buckley School on behalf of their campus enhancement plan. For the last ten years, I have lived at 14121 Valley Vista Boulevard, on the northwest corner of Stansbury and Valley Vista. The last stop sign before heading up to Buckley is planted in the daisies of my front yard. Although my husband and I both work at independent schools, our children do not attend Buckley and we have no vested interest in the school other than as neighbors.

We have found the administrators at Buckley to be excellent and caring neighbors who have worked hard to mitigate traffic flow to and from their campus as much as is possible. There was a time, two prior administrations ago, when there was far less care exhibited than there is today, and I believe that some of our neighbors on Stansbury are still harking back to those days. As independent school administrators, my husband and I believe that Buckley has a right to offer its educational program in the best possible environment, and we think that they have put a great deal of time and thought into coming up with a plan that is workable for themselves while also taking the neighbor's concerns into account

Living as we do at a four-way intersection just two blocks east of Beverly Glen, a major thoroughfare, we are accustomed to morning and evening traffic. We also know that Stansbury Avenue is designated by the City as secondary traffic artery, and we were aware of all this at the time we bought our home. In many ways, we are more directly impacted by traffic than our neighbors to the north on Stansbury, since we experience both north-south Stansbury traffic as well as east-west Valley Vista traffic. We believe that Buckley will continue to act as a good neighbor and we support their plan.

I have lived my entire life in the Sherman Oaks area and still own the home on Dixie Canyon Avenue which my grandparents purchased in 1936 and lived in for nearly 70 years. My grandfather used to roll his eyes when he would hear about Buckley's neighbors being upset with them. He would then remind us that, in the 20s and 30s, race car driver Barney Oldfield owned the land on which Buckley sits, and all he did was host party after party at his estate. Then, the land became a country club known for its own share of late-night partying. My grandfather would smile wryly and say, "If only they could remember what it used to be like! What would

the neighbors rather have? Drunks careening through their neighborhood after too much partying? Or a school dedicated to educating our future?"

We feel the same way.

RESPONSE NO. 30-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 31

Philip & Alyce de Toledo
3611 Longridge Avenue
Sherman Oaks, California 91423

COMMENT NO. 31-1

We have been residents of Sherman Oaks for 13 years. We recently received the notice of filing of the draft EIR report for The Buckley School and are familiar with the school's project plans.

The expansion of schools, both public and private, in local neighborhoods is critical to maintaining the quality of life in the City of Los Angeles. It appears that The Buckley School has made significant efforts to minimize the impact on the neighborhood.

We are very supportive of the school's project plans. Please feel free to contact us if you have any questions.

RESPONSE NO. 31-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 32

Cathy Walsh
14473 Glorietta Dr.
Sherman Oaks, CA 91423
ctfunw@aol.com

C Vivian Gumbiner, Chair, Concerned Neighbors of Buckley – A SOHA Committee

COMMENT NO. 32-1

This is to ask that you deny Buckley School's request to proceed with their proposed Campus Enhancement Program. As you are probably aware, the plan involves increasing student enrollment, re-zoning land use designations and rebuilding/expanding most campus buildings. The plan should be denied for the following reasons:

RESPONSE NO. 32-1

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Please refer to the responses below for discussion of the specific issues raised by the Commenter. Please also refer to Response to Comment No. 5-1 regarding the need for and appropriateness of the project. To clarify, the proposed project no longer involves a change to the General Plan land use designation for the site, nor a Zone Change.

COMMENT NO. 32-2

Noise and Traffic Pollution: The building demolition will cause noise and disruption, and the trucks and equipment needed for new construction will increase traffic, noise and pollution. From what I have been told, the construction and the resulting disruption would last for a seven-year period.

RESPONSE NO. 32-2

As indicated in the Section II, Project Description, of the Draft EIR, the three general phases of construction would occur over the course of approximately five years, spread out over an approximate six and half year timeframe.[142] Also refer to Sections IV.B, Air Quality, and IV.I, Noise, of the Draft EIR, as well as Section II, Corrections and Additions, of this Final EIR for detailed analyses of potential air quality and noise impacts associated with construction of the

[142] *Refer to Section II, Corrections and Additions, of this Final EIR for a correction to the duration of construction originally presented in the Draft EIR.*

proposed project. Also refer to Response to Comment Nos. 5-6 and 5-9 for discussion of construction-related air quality and noise impacts.

COMMENT NO. 32-3

Safety: I have been told that the expansion plan would also exacerbate existing safety concerns. Although, I do not know the details of these concerns, I would hope that if the concerns were true, that they be taken seriously.

RESPONSE NO. 32-3

Please refer to Response to Comment Nos. 7-10, 12-8 and 12-39 herein, as well as Section IV.F, Hazards and Hazardous Materials, of the Draft EIR and the Initial Study provided in Appendix B to the Draft EIR, with regard to emergency access and safety.

COMMENT NO. 32-4

Inaccurate/False Claims: I have been told that Buckley claimed that their plan incorporated the surrounding neighbors' input, when in actuality, the plan ignored the neighbors' concerns.

RESPONSE NO. 32-4

Please refer to Response to Comment No. 5-8 regarding the project planning and design process, which dates back to 1997 and has included extensive community input, as further detailed in Section II, Project Description, of the Draft EIR. As part of this process, a previous plan (described in the November 2004 EAF/Draft Initial Study and the NOP dated January 12, 2005, and now analyzed as Alternative E to the project in Section V, Alternatives, of the Draft EIR) was revised in response to community concerns regarding construction impacts and soil export. As a result, the project as currently proposed has substantially reduced construction impacts and nominal (i.e., less than 1,000 cubic yards) soil import and/or export. The construction timeframe has also been reduced, and the majority of construction activity has been moved towards the central and eastern portions of the campus, furthest from residences to the north and west.

In addition, in a good faith effort to work with the surrounding community, the School has made several recent concessions to address neighbors' concerns. As examples, as discussed throughout this Response to Comments section as well as in Section II, Subsection G, Corrections and Additions, of this Final EIR, the School plans to remove the barb wire along the fencing on Camino de la Cumbre, would not request another enrollment increase for a period of 20 years from the issuance of a Certificate of Occupancy for the Middle and Upper School Main Academic Center, and would implement a Neighborhood Protection Plan designed to create a

formal mechanism for addressing issues of community concern that may arise during the construction and operation of the School.

COMMENT NO. 32-5

I share my neighbors' concerns about the potential increased traffic and, if implemented, the plan's impact on the surrounding environment and the neighborhood's quality of life. This neighborhood is already laden with heavy traffic congestion due to the numerous individuals using the residential streets as an alternate southbound path in the morning and northbound path in the evening. Often, during weekday mornings, the traffic is so congested that it can take ten to fifteen minutes to drive less than a mile on Valley Vista Street. Instead of considering a plan that would exacerbate this problem, the City should be making efforts to address this on-going traffic congestion.

RESPONSE NO. 32-5

Please refer to Response to Comment Nos. 7-2, 12-4 and 12-7 and Section IV.J, Transportation and Circulation, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR regarding traffic and access. With implementation of the proposed mitigation measures, operation of the project would result in less than significant traffic impacts. More specifically, Mitigation Measure J-6 would involve improvements to the southbound Stansbury Avenue and eastbound Valley Vista Boulevard approaches to the Stansbury/Valley Vista intersection such that one left-turn/through shared lane and one right-turn-only lane would be provided. These improvements would serve to alleviate both School-related and local commuter queuing at the intersection. In addition, although not required as mitigation, the School has volunteered to reduce the project daily generation of 278 vehicle trips by at least 40 percent (i.e., a reduction of at least 111 trips). To further reduce impacts, the Applicant also volunteers to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan.[143]

Regarding quality of life issues, CEQA Guidelines Section 15131(a) states that social effects shall not be considered as significant impacts on the environment, except insofar as they may cause physical changes to the environment related to the project. As such, quality of life issues are beyond the scope of this EIR.

[143] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the TDM Plan.*

COMMENT NO. 32-6

Therefore I support the alternate recommendation that Buckley create a split campus plan.

Thank you for the opportunity to express my concerns.

RESPONSE NO. 32-6

Please refer to Response to Comment No. 12-24 regarding a split campus. As discussed, The Buckley School has considered splitting the campus between two or more sites, and numerous sites have been investigated over the past 15 years, as addressed more thoroughly in Section V, Alternatives, of the Draft EIR. None of these sites have been determined to be feasible for relocation of a portion of the School.

LETTER NO. 33

Dennis Weiss
13866 Valley Vista Blvd.
Sherman Oaks, CA 91423

COMMENT NO. 33-1

As a resident of Sherman Oaks since 1957 I have witness [sic] a lot of change in my neighborhood. Some of it good, some not so good. Over the last 15 years I have lived very close to the Buckley School residing on Valley Vista Blvd and have been following the recent plans to modernize and enhance their campus.

I am not an alumni of the school. I attended Chandler Elementary, Millikan Junior High and Grant High. Nor do I have any children. My interests are simply as a local resident, who in addition drives the Stansbury, Valley Vista intersection at least once daily.

I am a supporter of having a school of Buckley's reputation in my community. A reputation from what I hear seems only to be growing in stature and quality in recent years.

To me Buckley has always been a good neighbor. The fact that the school needs to modernize is a reality. From all that I have read and heard the school has as [sic] been going about it with respect and sensitivity to the neighborhood. They have revised plans and generally are just building on the existing footprint of the campus.

Bringing in building crews obviously will always creates [sic] some extra traffic, however I think Buckley's proposed starting hours will help to reduce traffic, especially during the peak commuting hours.

Regarding their use of the campus on additional weekends does not create a problem for me since it seems their [sic] will be enough parking on campus.

I believe having quality independent schools in prime residential neighborhoods is positive.

I am in total support of the Buckley School's campus enhancement Plan.

RESPONSE NO. 33-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 34

Steve and Kelly Weiss
4055 Stansbury Avenue
Sherman Oaks, CA 91423

COMMENT NO. 34-1

We are writing in response to The Buckley's School's draft environmental impact report (DEIR) concerning its proposed expansion.

There are fewer than five (5) K-12 independent schools in the entire city of Los Angeles that serve all thirteen (13) grade levels on a single campus. Of those five (5), there is only one (1) school that serves grades K-12 on a single campus that is also located at the end of a cul-de-sac in an exclusively residential zone (RE-40), The Buckley School.

There is a reason for this---it's bad land planning to situate a school in such a location. That's why there is only one K-12 school that enjoys this privileged location in the entire city--Buckley.

RESPONSE NO. 34-1

Please refer to Response to Comment No. 5-1 regarding the appropriateness of schools in residential neighborhoods. Also refer to Response to Comment No. 12-45 regarding the siting of private schools throughout the City. As discussed therein, several area schools including the Center for Early Education, Brentwood School, Harvard-Westlake Middle School, and Crespi Carmelite High School have challenging ingress/egress issues.[144] Many have recently modernized and/or expanded at their existing locations, and such improvements are consistent with the City's well-established policy of siting and maintaining schools in residential areas. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 34-2

Our specific concerns with the DEIR are as follows:

1. 6-7 Years of Construction: This time period for construction to complete the expansion is an [sic] reasonable burden on the neighborhood. Buckley has admitted that this time frame is

[144] *Furthermore, within the City of Glendale, Glendale Adventist Academy is located on a cul-de-sac at the northerly terminus of Kimlin Drive, north of Chevy Chase Drive. The School's enrollment is currently estimated at 675 students (grades K-12). Additionally, Village Christian School in the City of Sun Valley is located on a cul-de-sac. The annual K-12 enrollment is approximately 1,950 students.*

necessary to provide for the continued use of the facilities during construction, and to allow adequate time for fundraising to finance development. Notwithstanding Buckley's internal challenges, 6-7 years of on-again, off again construction activity presents unmitigatable [sic] impacts on the neighborhood including but not limited to construction traffic, school-related operations traffic, noise, road debris, dust, and other construction-related concerns.

RESPONSE NO. 34-2

As indicated in the Section II, Project Description, of the Draft EIR, the three general phases of construction would occur over the course of approximately five years, spread out over an approximate six and half year timeframe.[145] Also refer to Sections IV.B, Air Quality and IV.I, Noise, as amended in Section II, Corrections and Additions, of this Final EIR for detailed analyses of potential air quality and noise impacts associated with construction of the proposed project. As discussed in Section IV.J, Transportation and Circulation, of the Draft EIR, as also amended in Section II, Corrections and Additions, of this Final EIR, while the project would result in significant construction impacts, mitigation measures would be implemented during construction to ensure safe conditions and minimize conflicts with pedestrians and motorists.

COMMENT NO. 34-3

2. Building Heights: There are two governing ordinances that limit the height of all buildings in this area, the Hillside Ordinance and the Mulholland Scenic Corridor Specific Plan. The single-family homes that surround the school should not be subjected to overlooking commercial buildings that exceed the 36 foot height limit imposed under the Hillside Ordinance. Buckley argument that no building will be higher than its existing Disney Pavilion is specious. The property slopes from south to north. The land beneath the proposed 55 foot tall building is approximately 20 feet lower than the land beneath the Disney Pavilion, thus Buckley's argument that the roof elevations are level. This does not change the fact that the building is actually 55 feet tall and will clearly appear to be this tall for anyone looking down on the school from their single-family home above.

RESPONSE NO. 34-3

Please refer to Response to Comment No. 5-5 regarding the proposed building heights. As discussed therein and more thoroughly in Sections IV.A, Aesthetics and IV.H, Land Use, of the Draft EIR, the Middle and Upper School Main Academic Center would visually appear as 31.1 to 43.6 feet in height from most vantage points due to the sloping nature of the site's natural topography as well as the grade changes proposed in this area of the campus. The high point of the building would occur on the eastern façade, which would not be visible to neighboring

[145] *Refer to Section II, Corrections and Additions, of this Final EIR for a correction to the duration of construction originally presented in the Draft EIR.*

residential properties. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 34-4

3. Hours of Operation: Buckley has requested to extend their current hours of operation of 7am-6pm to 7am-8.30pm (M-F). This is an obnoxious request in a residential neighborhood. The school has operated since 1965 with a 6pm closing time. Extending the closing time to 8:30pm may serve the needs of the school, and might be acceptable if the school were located on a commercial roadway, but this request leads to far too much school-related traffic after normal business hours when neighbors should be entitled to enjoy the peace and quite of their own street.

RESPONSE NO. 34-4

Please see Response to Comment 21-4 for discussion of the School's request for revised hours of operation.

COMMENT NO. 34-5

4. Vehicle Trips: The school already generates too many vehicle trips for Stansbury Avenue, especially when added to the vehicles using Stansbury to "cut across" to Beverly Glen. Any school expansion should be based on a reduction in vehicle trips through either mandatory carpooling or a bus-shuttling program.

RESPONSE NO. 34-5

Please refer to Responses to Comment Nos. 12-3, 12-4 and 12-7 regarding traffic and access.

COMMENT NO. 34-6

5. Enrollment Increase: The school has requested an enrollment increase from 750 students to 830, with the proviso that this could increase after only 15 years. Any enrollment increase should require a lifetime cap.

RESPONSE NO. 34-6

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As discussed in Response to Comment No. 12-23, the School has volunteered a condition that it would not request another enrollment increase for a period of 20 years from the issuance of a Certificate of Occupancy for the Middle and Upper School Main Academic Center.

COMMENT NO. 34-7

6. Staff on Campus: The school has requested that maintenance personnel, faculty, staff and security personnel be allowed on campus at any time of the day or night. This is an unreasonable request. There should be no school-related traffic on any surrounding residential streets after normal business hours and on weekends, except for specified and restricted exceptions.

RESPONSE NO. 34-7

As discussed in Section II, Project Description, of the Draft EIR, full time access to the campus is necessary for faculty, staff, and maintenance and security personnel in order to optimally operate the school and ensure the safety of all students and the security of campus facilities. In particular, it is important that security personnel be present on-site after hours. Faculty and staff may also require access outside of the regular school day for lesson planning, class preparation, internal meetings, and other work-related activities that cannot occur during campus hours. Large numbers of faculty, staff, and/or maintenance or security personnel are not expected to be on-site outside of regular campus hours with any regularity. A nominal number of maintenance personnel, staff and security personnel would not have an impact on adjacent uses since they would not be traveling to/from the campus during peak traffic hours, sufficient parking would be available on-site, and they would be indoors for the most part (thus precluding noise impacts). Further, the School has agreed to limit outdoor mechanized maintenance activities to between 7:00 A.M. and 8:30 P.M. on weekdays and between 8:00 A.M. and 7:00 P.M. on weekends, except in emergency repair situations, as discussed in Section II, Corrections and Additions (Subsection G), of this Final EIR. In addition, under Condition 18 of the School's existing CUP, maintenance, security personnel and faculty may be present on the campus outside of the School's normal operating hours.[146] Therefore, the School's request does not represent a change in operating conditions. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

[146] *Under existing conditions, the Camino de la Cumbre gate serves as an exit for some faculty, staff, and other vehicles after school hours and when the main entrance/exit is closed. As part of the project, vehicles would not be permitted to travel beyond the northern portion of campus in order to separate pedestrian and vehicular traffic on campus. The Camino de la Cumbre gate would only be used for limited access for service vehicles, deliveries, some employees, athletic field access, and emergency access. The shift in after-hours campus traffic from Camino de la Cumbre to the main gate on Stansbury Avenue would not result in significant traffic impacts. As discussed in Section IV.J, Transportation and Circulation, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, no significant unmitigable traffic impacts would occur as a result of project operations.*

LETTER NO. 35

Mark Wolfson
Reel Entertainment, LLC
11684 Ventura Blvd., Suite 134
Studio City, CA 91604

COMMENT NO. 35-1

I am a local resident living on Stansbury with no children at the school. I am: writing to inform you of my strong support for the Buckley School project. The staff and students have consistently and voluntarily reviewed, adjusted and accommodated this neighborhood in their quest to bring a higher level of education to the area with a minimum of impact on the surrounding residents. This history lets me know that their respect for the local residents and area will continue and they will work hard to minimize neighborhood disruption during the temporary construction phase.

The school has been in the neighborhood longer than most residents have and is an important member of our community.

As we all know there is traffic on Stansbury daily, and since it is a feeder road to Beverly Glen and commuters traveling over the hill to the west side, not all the traffic on Stansbury can be attributable to Buckley. Unlike the feeder traffic, Buckley commuters have a planned orderly structure and predictable presence. Buckley traffic is concentrated only during the morning commute for a relatively short period and at end of day for an equally short period. Buckley has implemented a new on campus queuing process this school year to eliminate queuing on Stansbury. Frankly I have to say that I work out of my home and am around during both periods during the day. I have not been inconvenienced or bothered by the process in any way while living here and the change of queuing effects the people South of Valley Vista more than me.

We need quality independent schools and I am proud that we have one in our neighborhood.

RESPONSE NO. 35-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 36

Peter Wright
Sherman Oaks
pkwright@pkwright.com

COMMENT NO. 36-1

As a resident of the neighborhood surrounding Buckley I feel it important to express to each of you my support of The Buckley School's proposed renovations.

I'm very dismayed at the one-sided approach being taken by the Sherman Oaks Homeowners Association on this matter and can assure you that their extreme anti-development stance does not represent the feelings of many of us who live near Buckley. A strong and relevant Buckley School helps make the surrounding neighborhood (my neighborhood!) strong, relevant, and desirable as well. If Buckley is not allowed to modernize it will will [sic] whither [sic] away over time, which would harm the surrounding neighborhood far more than the execution of their proposed plan will inconvenience us.

I have no affiliation with Buckley and my support for them is the result of an unbiased, open-minded look at the facts surrounding this issue. If you approach this issue in the same manner I trust you'll come to a similar conclusion.

RESPONSE NO. 36-1

The comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 37

Arlene Wszalek
15649 Woodfield Place
Sherman Oaks, CA 91403

COMMENT NO. 37-1

I'm writing to you as a Sherman Oaks resident (and Sherman Oaks Homeowners Association member), and also as a parent whose child attends The Buckley School, to express my unqualified support for Buckley's Campus Enhancement Plan (CEP).

Buckley is an absolutely first-rate school, and a real asset to our community. In order for it to remain so, it's reasonable and necessary for Buckley to make sure that its facilities and operating conditions - both of which are extremely outdated - are commensurate with those of the other top-tier indepdendent [sic] schools in Los Angeles. The CEP will achieve those goals.

The school has modified its CEP several times over the last few years in response to the concerns of neighbors. It's worth noting that many of the homes close to Buckley have themselves been extensively remodeled lately. Buckley deserves the same opportunity to improve its infrastructure as do those homeowners.

The school has been extremely sensitive to the environmental impact of its plans, and as parents we will continue to help mitigate traffic and be good neighbors to those who live in the immediate area

I urge you to recommend approval of Buckley's CEP, so that this jewel in Sherman Oaks' crown can continue to shine brightly for years to come. Please feel free to contact me if you have questions or would like more information.

RESPONSE NO. 37-1

This comment addresses general support for the project and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 38

John T. Wulfmeyer, A.I.A.
John Wulfmeyer Architect
3920 Stansbury Ave
Sherman Oaks, CA 91423

COMMENT NO. 38-1

My previous letter was drafted following your call for comments, and dated March 11, 2006. That letter concerned inefficiencies in the drop-off and pick-up of students, which had impacts upon the traffic on Stansbury Avenue, the immediate block leading into the school. Some of the comments made in that letter did receive the attention of Buckley planning officials, and some changes in the queuing process were initiated with varying degrees of success.

I am very pleased that Buckley has recently maintained open communication in an effort to work through the traffic issues on Stansbury Avenue. They continue to solicit opinions as to the effectiveness of traffic changes they initiate.

Recently, a meeting was held at Buckley between Lisa Turchan, Buckley Director of Finance and Administration; Jeff Kalban, Buckley's Architect; Curtis Covington, Buckley Director of Physical Plant; and me. The purpose of the meeting was to discuss a series of concerns that I had emailed to Lisa Turchan and Jeff Kalban in November, regarding the queuing of vehicles within the Phase 3 parking structure. My email addressed the following concerns:

RESPONSE NO. 38-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT NO. 38-2

1. The willingness of parents to wait in queue within the parking structure, with their car's engines running, while they gradually move to the pickup point. The success of this concept relies on air quality and the perception of air quality. If, after the structure is built, there becomes a reluctance by parents to be in this environment, there will be a resulting backup on Stansbury, because there will be no other options available. We must be certain that this does not become a reality.

RESPONSE NO. 38-2

As discussed in Response to Comment 5-9, above, and within Section II, Project Description, of the Draft EIR, the project would include access and queuing improvements that would improve traffic flow and eliminate queuing along Stansbury Avenue. This improved on-site access and circulation would also serve to reduce pollutant emissions.

The proposed parking structure would be built in accordance with regulatory requirements, and as such, adequate ventilation would be provided. In addition, Mitigation Measure J-7 within the Draft EIR requires that all student drop-off and loading shall take place entirely on-site, without any on-street student drop-off. As part of this mitigation measure, the School shall prepare a student drop-off and pick-up plan to be reviewed by the LADOT district office. The plan would include provisions for staggered drop-off and pick-up hours so as to reduce queuing on-site. The plan would also include provisions for penalties for parents who do not follow the drop-off and pick-up rules. Thus, any reluctance by parents to use the specific drop-off and pick-up procedures would be addressed.

COMMENT NO. 38-3

2. The presence of 2 lanes of cars in the structure's drive aisles means that cars parked in the adjacent stalls are trapped until the completion of the queuing process. Efforts to back into the queuing lanes would stop the continuous flow of traffic, backing up the queue. That queuing concept appeared to rely on Buckley's management to preserve the flow of traffic.

RESPONSE NO. 38-3

The vehicle queuing plan proposed would be fine-tuned to avoid disruptive conflicts between vehicles in the queue and vehicles trying to back out of or enter adjacent parking stalls. In addition, school personnel would be present to monitor and direct circulation within the parking structure to further ensure smooth operation of the queuing plan.

COMMENT NO. 38-4

During the meeting the following discussion occurred:

Discussions of Concern 1:

We discussed some minor revisions to mitigate auto pinch-points at the approach to the structure and within the structure. The current plan shows some conflict between autos in adjacent lanes where the autos must make congruent turns. Those conflicts would result in both lanes having to stop and merge into one at the south turn within the structure, which would impact the efficiency

of traffic flow. We discussed the opportunity to widen both lanes at the south end so that cars can continue to turn freely without stopping or merging.

RESPONSE NO. 38-4

As mentioned above, the proposed vehicle queuing plan would be fine-tuned throughout the parking structure design and drop-off/pick-up implementation phases so as to avoid conflicts associated with turning movements and traffic flow within the structure. School personnel would be present to monitor and direct circulation during student drop-off/pick-up, and specifically would help regulate and control vehicles at "pinch points" to minimize side-by-side conflicts. Any plan to widen lanes within the parking structure would occur at the cost of proposed parking spaces and therefore would not be practical.

COMMENT NO. 38-5

We did not discuss the issue of air quality. I am confident that adequate ventilation will be provided by the design team; however, it will remain the design team's challenge to create the perception of a healthy environment so that parents are comfortable waiting in queue.

RESPONSE NO. 38-5

The parking structure would be built in accordance with regulatory requirements, and as such, adequate ventilation would be provided. In addition, as indicated above in Response to Comment No. 38-2 above, the School would be required to prepare a student drop-off and pick-up plan for review by LADOT that would also include provisions for penalties for parents who do not follow the drop-off and pick-up rules.

COMMENT NO. 38-6

Discussions of Concern 2:

Lisa Turchan explained that the top level, east half of the parking structure will be devoted to flex parking spaces (60+) for staff or students that must move their cars during the hours of the queuing process. This appears to be a good idea if managed and enforced.

Jeff Kalban also mentioned a concept that has yet to be studied by the traffic consultant. The concept would move cars in parallel lanes on independent levels within the parking structure; i.e., cars would enter and exit on the same level. I am intrigued with that concept, because I believe that it could double the loading and unloading capacity of the current concept.

RESPONSE NO. 38-6

The School will continue to operate with assigned parking, which is strictly obeyed and enforced. All staff and students are aware of their assigned parking spaces/areas, and visitor parking spaces will be clearly marked. The School would continue to employ 24-hour guards who continuously monitor the parking areas.

As evaluated in Section IV.J, Transportation and Circulation, and Appendix L of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, the queuing capacity afforded by the parking structure and new arrival plaza would be more than sufficient to accommodate School-related vehicles during student drop-off/pick-up. Throughout the specific design phase for the parking structure and arrival plaza, the traffic consultants for the project will continue to evaluate the plans in order to maximize circulation efficiency and queuing space.

COMMENT NO. 38-7

Additional discussion items of note:

- I remain concerned that the buses are not used by the students. I know that Buckley states that 15% of the students ride the buses, but I am not convinced. They go by my house every day empty, or containing 3 to 4 students; maybe.

  Even when the parking structure is completed, the parking capacity will only be approximately 1/3 of the current enrollment of 750, so it is essential that the buses play a significant roll in reducing the traffic. The bottom line is that Buckley needs to develop a bus use plan and then enforce its implementation. All of the presentations that I have heard have stated that traffic will be mitigated through bus usage; but specifically, what is the plan and how is it enforced? That mitigation could be occurring now. It is not. This is a management issue.

RESPONSE NO. 38-7

As discussed in Section IV.J, Transportation and Circulation, of the Draft EIR, approximately 116 students (or 15.5 percent of the student population) were enrolled in the School's bus program during the 2005–2006 school year. In addition, approximately 300 day passes were sold to students for the buses throughout that year. The eight buses operated by the school bus service provider (which serve eight individual routes) collectively have capacity for

288 passengers.[147] The bus program experiences a somewhat higher ridership in the morning than in the afternoon, due to student participation in after-school extracurricular activities.

As discussed in Response to Comment 38-2, above, mitigation for the proposed project includes implementation of a TDM Plan that would increase the use of carpooling, public transportation, bicycling, and privately operated bus and shuttle services. The TDM Plan shall achieve a reduction of at least 75 project trips during the A.M. peak hour, resulting in no increase to the existing A.M. peak-hour trip generation level, and a reduction of at least 4 project trips during the School P.M. peak hour. In addition, although not required as mitigation, the School has volunteered to reduce the project daily generation of 278 vehicle trips by at least 40 percent (i.e., a reduction of at least 111 trips). To further reduce impacts, the Applicant also volunteers to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour as part of the TDM Plan.[148] As described in the Draft TDM plan included in Appendix 3 of this Final EIR, a key element of the Plan is an increased level of participation in the comprehensive student busing program. In addition, the School would submit an annual monitoring report to LADOT regarding the performance of the TDM Plan, which would ensure that the TDM plan elements are implemented. Furthermore, Section IV of this Final EIR contains the CEQA-required Mitigation Monitoring and Reporting Program (MMRP), the primary purpose of which is to ensure that the mitigation measures identified in the EIR are implemented, thereby minimizing identified environmental effects.

Regarding the proposed parking supply, it is inaccurate to calculate parking needs based on the student population since the vast majority of students do not drive to campus, nor do most parents or carpools park on-site when dropping off or picking up students. LAMC parking requirements are determined based on specific land uses and floor areas. For high schools, Code required parking is based on size of the largest assembly use; for elementary schools, parking requirements are based on the number of classrooms on-site. As discussed in Section IV.J, Transportation and Circulation, of the Draft EIR, based on LAMC parking requirements the project would be required to provide a total of 216 parking spaces.[149] Under the project approximately 306 parking spaces would be provided on-site, which would provide a surplus beyond the maximum hypothetical parking demand, the actual daily parking demand, as well as

[147] *Refer to Appendix L of the Draft EIR for further discussion of the bus service provided.*

[148] *Refer to Section II, Subsection G, Corrections and Additions, of this Final EIR for updated information regarding the TDM Plan.*

[149] *However, since this amount is less than the existing CUP parking requirement of 230 spaces, it has not been applied as the project parking requirement. As further discussed in the Draft EIR, in the interest of providing a conservative analysis, the Traffic Study evaluated a hypothetical parking demand based on concurrent use of two Upper School assembly spaces, which would raise the parking requirement to 294 spaces; however, the LAMC parking requirement for high schools is based only on the largest assembly use facility. In any case, the proposed parking supply of 306 spaces would exceed the Code parking requirement, as well as the maximum hypothetical parking demand and the actual daily parking demand.*

the Code-required parking supply. Thus, the project's proposed parking supply would be more than adequate.

COMMENT NO. 38-8

- Buckley recently implemented a new queuing process whereby the parents are directed to the south end of the internal road, around the bus island and back north to the corner of the Middle School where the students can be picked up and dropped off. The intent was to pull traffic as far off Stansbury as possible. However, a significant number of parents are not following the plan and choose to stop in front of the Elementary School instead, effectively canceling the schools efforts to move traffic and mitigate the queuing on Stansbury. This also is a management and enforcement issue.

RESPONSE NO. 38-8

Middle and Upper School afternoon dismissal queuing is now directed around the bus island, as described by the commentor. The morning and Lower School afternoon dismissal traffic cannot be directed around the bus island since classes are in session at these times and the driveway is utilized as a pedestrian thoroughfare for students going to and from classes. Student safety is paramount during queuing times, and alternative pedestrian routes between the campus buildings and new queuing areas are not currently available. This new queuing process across the campus is not an option for Lower School students as it would pose a risk to young children who would need to cross moving traffic to walk between the Lower School buildings and the queued vehicles. The queuing space for the Lower School is presently physically limited; however, the project would rectify this situation through the introduction of a completely redesigned arrival plaza and adequate queuing capacity within the proposed parking facility.

As discussed in Response to Comment No. 38-2, above, Mitigation Measure J-7 within the Draft EIR would require that all student drop-off and loading take place entirely on-site, without any on-street student drop-off. As part of this mitigation measure, the School would prepare a student drop-off and pick-up plan to be reviewed by the LADOT district office. The plan would also include provisions for penalties for parents who do not follow the drop-off and pick-up rules.

COMMENT NO. 38-9

It is unclear how the queuing process will be maintained during each of the construction phases. This subject received some discussion at our meeting, but I was convinced that specific plans should be developed to assure: 1. vehicle queuing can be maintained on campus and kept off Stansbury during all of the construction phases; 2. emergency vehicles have adequate access through campus; and 3. that the contractor has adequate access, storage, and layout for his work.

If all of these issues are not planned and accommodated, the result could be queuing back on Stansbury.

RESPONSE NO. 38-9

Section V.J, Transportation and Circulation, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR, includes project features that address parking and access during construction. These project features include the requirement that construction-related vehicles be parked on-site or in off-site parking lots, pursuant to a Temporary Parking Plan, and the requirement that construction trucks, materials and equipment shall not be staged on local or collector streets, Valley Vista Boulevard, Van Nuys Boulevard, or Beverly Glen Boulevard south of Ventura Boulevard. In addition, while specific details of the various construction phases and activities have not yet been determined, a queuing plan will be developed for implementation during construction of the project to ensure that queuing will be contained on-site as much as feasible during construction.

Emergency access and emergency evacuation during construction would function in much the same way as during regular project operations. Please refer to Response to Comment Nos. 7-10 and 12-39 for further discussion of emergency access and evacuation. As discussed within Section II, Corrections and Additions, of this Final EIR, under the potential alternative construction phasing schedule, prior to project construction, the existing access drive from the School's back gate along Camino de la Cumbre to the existing Main Academic Campus buildings and the athletic field would be widened in order to meet Fire Code requirements. This activity would be planned separate from, and in advance of, project construction in order to more immediately enhance emergency access on-site, as the access road would be maintained as a 20-foot clear Fire Department emergency access route.

COMMENT NO. 38-10

I am speaking as an architect, but my wife concurs: we are concerned that too many of the current concept directions in the CUP Application rely upon Buckley's management and enforcement to be successful, as you see above.

The Buckley School is a very good neighbor for us. The students that we have met are respectful and friendly, and we want them to receive the best education possible. Because we support Buckley's higher education goals, my wife and I favor the current expansion, however, without the increase in enrollment and not until queuing on Stansbury has been permanently eliminated.

My wife and I are hopeful, but we have yet to see a complete commitment by Buckley to successfully and finally solve the queuing problem on Stansbury Avenue. I do believe that

Buckley has recently begun to address the queuing issue, but this effort's credibility, so closely aligned with the CUP Application, may or may not be called into question; time will tell.

In our opinion, the CUP certainly should not be granted until such time that the current queuing issues on Stansbury are permanently eliminated.

Thank you

RESPONSE NO. 38-10

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As discussed in Section IV.J, Transportation and Circulation, of the Draft EIR, as amended in Section II, Corrections and Additions, of this Final EIR a new two-level parking structure and new arrival plaza will be constructed as a part of the project to provide adequate site access and circulation on-site in order to eliminate vehicular queuing on Stansbury Avenue. Relative to the enforcement of the project's proposed mitigation measures, Section IV of this Final EIR contains the CEQA-required Mitigation Monitoring and Reporting Program (MMRP), the primary purpose of which is to ensure that the mitigation measures identified in the EIR are implemented, thereby minimizing identified environmental effects.

IV. Mitigation Monitoring and Reporting Program

IV. MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires adoption of a MMRP for projects in which the Lead Agency has required changes or adopted mitigation to avoid significant environmental effects. The Los Angeles Department of City Planning (Planning Department) is the Lead Agency for the proposed Buckley School Campus Enhancement Plan and is, therefore, responsible for administering and implementing the MMRP. The decision-makers must define specific reporting and/or monitoring requirements to be enforced during project implementation prior to final approval of the proposed project. The primary purpose of the MMRP is to ensure that the mitigation measures identified in the EIR are implemented, thereby minimizing identified environmental effects.

The MMRP for the proposed project will be in place through all phases of the project, including design (pre-construction), construction, and operation (post-construction, both prior to and post-occupancy). The Planning Department shall be responsible for administering the MMRP activities to its staff, other City departments (e.g., Department of Building and Safety, Department of Public Works, etc.), consultants, and/or contractors. The Planning Department will also ensure that mitigation monitoring is documented through reports and that deficiencies are promptly corrected. The designated environmental monitor (e.g., City building inspector, project contractor, certified professionals, etc., depending on the provisions specified below) will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to remedy problems.

Each mitigation measure is categorized by impact area, with an accompanying identification of:

- The enforcement agency;
- The monitoring agency;
- The monitoring phase (i.e., the phase of the project during which the measure should be monitored):

  Pre-construction
  Construction
  Project operation (prior to and post-occupancy);
- The monitoring frequency; and
- The action indicating compliance with the mitigation measure(s).

A. AESTHETICS, VIEWS AND LIGHT AND GLARE

Mitigation Measure A-1: All open areas not used for buildings, driveways, parking areas, athletic facilities, plazas, walkways, or patios shall be landscaped and maintained to reduce visibility of the project improvements from adjacent residences in accordance with a Landscape Plan to be prepared by a licensed landscape architect to the satisfaction of the City Planning Department. Remaining existing natural landscape areas shall be retained and maintained in accordance with the landscape plan.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Phase: Pre-construction; project operation

Monitoring Frequency: Plan check review; periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Plan approval; periodic field inspection sign off

Mitigation Measure A-2: Nighttime lighting for use of the athletic field, Aquatic Center, and outdoor courts shall be prohibited, except as required for low level security and exiting purposes.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Phase: Pre-construction, project operation

Monitoring Frequency: Plan check review, project operation

Action Indicating Compliance with Mitigation Measure(s): Plan approval

B. AIR QUALITY

Mitigation Measure B-1: In addition to SCAQMD Rule 403 requirements, all land clearing/earth-moving activity areas shall be watered as necessary to remain visibly moist during active operations.

Enforcement Agency: SCAQMD

Monitoring Agency: Los Angeles Department of Building and Safety, SCAQMD

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic Site Inspection by Los Angeles Department of Building and Safety

Mitigation Measure B-2: All construction roads internal to the construction site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

Mitigation Measure B-3: Streets shall be swept as needed during construction, but not more frequently than hourly, if visible soil material has been carried onto adjacent public paved roads.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

Mitigation Measure B-4: Construction equipment shall be visually inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

Mitigation Measure B-5: Water three times daily or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

Mitigation Measure B-6: Establish an on-site construction equipment staging area and construction worker parking lots, located on either paved surfaces or unpaved surfaces subject to soil stabilization.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

Mitigation Measure B-7: Traffic speeds on all unpaved roads shall not exceed 15 mph.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

Mitigation Measure B-8: All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

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

Enforcement Agency: SCAQMD

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

Mitigation Measure B-10: Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.

Enforcement Agency: SCAQMD

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

Mitigation Measure B-11: General contractors shall maintain and operate construction equipment such that exhaust emissions are minimized. For example, engines shall be turned off while in queues or while loading/unloading. In addition, heavy equipment and petroleum-powered generators shall be turned off when not in use.

Enforcement Agency: SCAQMD

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

Mitigation Measure B-12: Petroleum-powered equipment shall be turned off during second-stage smog alerts.

Enforcement Agency: SCAQMD

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

Mitigation Measure B-13: Develop a construction traffic management plan that includes, but is not limited to: (1) consolidating truck deliveries; (2) providing a rideshare or shuttle service for construction workers; and (3) providing dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction

Monitoring Frequency: Plan check review

Action Indicating Compliance with Mitigation Measure(s): Plan approval

Mitigation Measure B-14: The project shall include energy-saving double-glazed windows in all new structures to the extent feasible.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Phase: Pre-construction

Monitoring Frequency: Plan check review

Action Indicating Compliance with Mitigation Measure(s): Plan approval

Mitigation Measure B-15: Outdoor activities of children on-site and school scheduling shall be coordinated to prevent undue exposure of students to active demolition and site grading activities.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of City Planning

Monitoring Phase: Pre-construction

Monitoring Frequency: Plan check review

Action Indicating Compliance with Mitigation Measure(s): Plan approval

C. BIOLOGICAL RESOURCES

Mitigation Measure C-1: Trees removed that are protected by the City of Los Angeles Protected Tree Ordinance shall be replaced within the property by at least two trees of a protected variety including valley and coast live oak, or any other tree of the quercus genus (excluding scrub oak), the California Walnut, the California sycamore, and the California bay. Each replacement tree shall be a 15-gallon, or larger specimen in size, measuring one inch or more in diameter at a point one foot above the base, and not less than seven feet in height measured from the base. The size and number of replacement trees shall approximate the value of the tree to be replaced.

Enforcement Agency: Los Angeles Bureau of Street Services - Street Tree Division and Department of Building and Safety

Monitoring Agency: Los Angeles Bureau of Street Services - Street Tree Division

Monitoring Phase: Pre-construction; project operation

Monitoring Frequency: Plan check for each phase; field inspection

Action Indicating Compliance with Mitigation Measure(s): Plan approval; compliance certification report by a certified arborist

Mitigation Measure C-2: All construction work potentially impacting any protected tree shall be approved by, performed under the supervision of, and inspected by a tree expert as defined by the City of Los Angeles Protected Tree Ordinance. This tree expert shall also oversee all maintenance work on the protected trees including irrigation, pruning and spraying.

Enforcement Agency: Los Angeles Bureau of Street Services - Street Tree Division and Department of Building and Safety

Monitoring Agency: Los Angeles Bureau of Street Services - Street Tree Division

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by a certified arborist and quarterly compliance certification report by the project contractor

Mitigation Measure C-3: During construction, the construction supervisor shall ensure that all construction employees are fully informed of the tree protection practices. This shall include information on the tree protection zone, the necessity of preventing damage, and the discussion of work practices that will accomplish such.

Enforcement Agency: Los Angeles Bureau of Street Services - Street Tree Division and Department of Building and Safety

Monitoring Agency: Los Angeles Bureau of Street Services - Street Tree Division

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report by the project contractor

Mitigation Measure C-4: During construction, six-foot-high, brightly colored construction fencing shall be erected along the construction side of partially and potentially impacted native trees to delineate the tree protection area. The protective fence shall be installed 5 feet outside of the tree's drip line, if possible. If construction is to occur within the drip line, the fencing shall be installed 12 inches inside the new footing or trenching line.

Enforcement Agency: Los Angeles Bureau of Street Services - Street Tree Division and Department of Building and Safety

Monitoring Agency: Los Angeles Bureau of Street Services - Street Tree Division

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Field inspection by a certified arborist and quarterly compliance certification report by the project contractor

Mitigation Measure C-5: Due to some sizeable trees and shrubs occurring within and adjacent to the Site, removal of any large trees and large branching shrubs shall take place outside of the nesting season (February 15-August 31) in accordance with the Migratory Bird Treaty Act (MBTA). If such removal activities must occur during the nesting season, a biological monitor shall be present during the removal activities to ensure that no active nests will be impacted. If active nests are found, a 200-foot buffer radius (500 feet for raptors) shall be established until the fledglings have left the nest or it has been determined that the nest has failed.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection during the February through August nesting season

Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by the project contractor

D. CULTURAL RESOURCES

Mitigation Measure D-1: A qualified paleontologist shall be retained by the Applicant and approved by the lead agency to oversee and carry out the mitigation measures stipulated in this EIR. The services of the paleontologist shall be secured by contacting the Natural History Museum of Los Angeles County.

Enforcement Agency: Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of City Planning

Monitoring Phase: Pre-construction, construction, and project operation

Monitoring Frequency: Consultation with paleontologist throughout construction

Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by qualified paleontologist

Mitigation Measure D-2: Prior to the start of constructed-related activities, construction personnel involved with earth-moving activities shall be informed by the paleontologist of the potential for encountering significant paleontologic resources, instructed on the proper notification procedures when such an encounter occurs, and taught how to identify fossils and other potential resources. This shall include the provision of written materials to familiarize personnel with the range of resources that might be expected, the type of activities that may result in impacts, and the legal framework of paleontological resources protection. Construction personnel shall also be informed that unauthorized collection of fossil resources is prohibited.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of City Planning

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Consultation with paleontologist

Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by qualified paleontologist

Mitigation Measure D-3: Prior to the start of construction, the paleontologist shall conduct a field survey of exposures of sensitive stratigraphic units within the construction site(s) that will be disturbed by excavation and construction activities such as drilling and/or pile driving. Earth-moving construction activities at depths determined by the paleontologist to be sensitive will be periodically monitored where such activity may disturb or encounter bedrock material of the marine Late Miocene Modelo Formation (Monterey

Formation). The frequency of monitoring efforts will be based on consultation with the paleontologist and will depend on the rate of excavation and grading activities; the type of construction-related activities, such as foundation pile driving/drilling; the materials being excavated; and if found, the abundance and type of fossils encountered. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. Monitoring will not be conducted in areas where grading, excavation, and/or construction activities will not occur or in areas where exposed sediment will be buried, but not otherwise disturbed.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: To be determined by consultation with paleontologist

Action Indicating Compliance with Mitigation Measure(s): If no unanticipated discoveries are found, compliance certification report by qualified paleontologist; if unanticipated discoveries are found, mitigation plan(s) by a qualified paleontologist

Mitigation Measure D-4: If a potential fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: To be determined by consultation with paleontologist

Action Indicating Compliance with Mitigation Measure(s): If no unanticipated discoveries are found, compliance certification report by qualified paleontologist; if unanticipated discoveries are found, mitigation plan(s) by a qualified paleontologist

Mitigation Measure D-5: At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: To be determined by consultation with paleontologist

Action Indicating Compliance with Mitigation Measure(s): If no unanticipated discoveries are found, compliance certification report by qualified paleontologist; if unanticipated discoveries are found, mitigation plan(s) by a qualified paleontologist

Mitigation Measure D-6: Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: To be determined by consultation with paleontologist

Action Indicating Compliance with Mitigation Measure(s): If no unanticipated discoveries are found, compliance certification report by qualified paleontologist; if unanticipated discoveries are found, mitigation plan(s) by a qualified paleontologist

Mitigation Measure D-7: Any fossils collected should be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: To be determined by consultation with paleontologist

Action Indicating Compliance with Mitigation Measure(s): If no unanticipated discoveries are found, compliance certification report by qualified paleontologist; if unanticipated discoveries are found, mitigation plan(s) by a qualified paleontologist

Mitigation Measure D-8: Following the completion of the above tasks, the paleontologist shall prepare a report documenting the absence or discovery of fossil resources on-site. If fossils are found, the report shall summarize the results of the monitoring program, identify those fossils encountered, recovery and curation efforts, and the methodology used in these efforts, as well as describe the fossils collected and their significance. The report shall be submitted by the Applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and the required mitigation measures.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: To be determined by consultation with paleontologist

Action Indicating Compliance with Mitigation Measure(s): If no unanticipated discoveries are found, compliance certification report by qualified paleontologist; if unanticipated discoveries are found, mitigation plan(s) by a qualified paleontologist

E. GEOLOGY/SEISMIC HAZARDS

Mitigation Measure E-1: The Applicant or its contractor shall incorporate the recommendations detailed in the geotechnical investigation prepared for the proposed project, as approved by the City of Los Angeles. (Geotechnical recommendations regarding general findings, the proposed swimming pool, foundation design, retaining walls, floor slabs, paving, drainage, waterproofing, plan review, site observations during construction, and construction site maintenance are provided on pages 13 through 22 of the Geologic and Geotechnical Engineering Report, prepared by The J. Byer Group, Inc. provided in Appendix F of the Draft EIR.)

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction and construction

Monitoring Frequency: Plan check review, once prior to issuance of a grading permit, and once at final inspection

Action Indicating Compliance with Mitigation Measure(s): Plan approval, issuance of a grading permit, and issuance of a Certificate of Occupancy

F. HAZARDS AND HAZARDOUS MATERIALS

Mitigation Measure F-1: Prior to demolition of any structure, the project Applicant shall abide by the requirements of SCAQMD Rule 1403 for asbestos-containing materials (ACMs).

Enforcement Agency: SCAQMD

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Plan check review

Action Indicating Compliance with Mitigation Measure(s): Plan approval

Mitigation Measure F-2: Removal of ACMs shall be performed by a certified asbestos containment contractor prior to demolition.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction (demolition)

Monitoring Frequency: Field inspection prior to demolition

Action Indicating Compliance with Mitigation Measure(s): Compliance report by the certified asbestos containment contractor

Mitigation Measure F-3: Removal of lead-based paints during demolition shall be performed by a certified lead containment contractor in compliance with applicable laws.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Demolition and construction

Monitoring Frequency: Field inspection during demolition

Action Indicating Compliance with Mitigation Measure(s): Compliance report by the certified lead containment contractor

Mitigation Measure F-4: Prior to or at the time that development of improvements in the vicinity of the potential UST within the former bus maintenance garage area occurs, the potential UST and any associated piping and contamination shall be investigated and removed and/or remediated in compliance with applicable regulatory requirements.

Enforcement Agency: Los Angeles Fire Department and Department of Building and Safety

Monitoring Agency: Los Angeles Fire Department

Monitoring Phase: Construction

Monitoring Frequency: Consultation with Los Angeles Fire Department

Action Indicating Compliance with Mitigation Measure(s): Compliance report by the project contractor

Mitigation Measure F-5: Any contaminated soil, subsurface features, or groundwater discovered during excavation and grading shall be evaluated and excavated/disposed of, treated in-situ or otherwise managed in accordance with the applicable regulatory requirements. If contamination is discovered during grading activities, grading within such an area shall be temporarily halted and redirected until the appropriate evaluation and response measures are implemented so as to render the area suitable for grading activities to resume.

Enforcement Agency: Los Angeles Fire Department and Department of Building and Safety

Monitoring Agency: Los Angeles Fire Department

Monitoring Phase: Construction

Monitoring Frequency: Field inspection

Action Indicating Compliance with Mitigation Measure(s): Compliance report by the project contractor

Mitigation Measure F-6: Any contaminated soils that may be stockpiled on-site shall be stored in a manner such that underlying soils are not cross-contaminated using such measures as heavy-duty plastic sheathing under or on top of the stockpiled soil or other suitable methods. In addition, all stock-piled materials

shall be protected to prevent material from being washed into the storm drains using such methods as use of sand bags around the material or other suitable methods. The management, treatment or disposal of all contaminated soils shall comply with all applicable federal, state, and local regulations related to hazardous waste.

Enforcement Agency: Los Angeles Fire Department and Department of Building and Safety

Monitoring Agency: Los Angeles Fire Department

Monitoring Phase: Construction

Monitoring Frequency: Field inspection

Action Indicating Compliance with Mitigation Measure(s): Compliance report by the project contractor

G. HYDROLOGY

Impacts associated with hydrology and surface water quality would be less than significant, and no mitigation measures would be required.

H. LAND USE

Impacts associated with land use would be less than significant, and no mitigation measures would be required.

I. NOISE

Mitigation Measure I-1: Engine idling from construction equipment such as bulldozers and haul trucks shall be limited, to the extent feasible.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Quarterly throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report by the project contractor

Mitigation Measure I-2: All construction equipment shall be fitted with residential grade mufflers, where readily available in the construction equipment fleet that regularly serves the City of Los Angeles. Prospective contractors shall demonstrate a good faith effort to locate such construction equipment for use throughout the duration of project construction.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Quarterly throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report by the project contractor

Mitigation Measure I-3: An 8-foot temporary sound barrier (e.g., wood fence) shall be erected along portions of the north and northwest property lines to limit the "line of sight" of construction activity from the adjacent residential properties that are located immediately north and northwest of proposed construction areas.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Quarterly throughout construction

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report by the project contractor

J. TRANSPORTATION AND CIRCULATION

Mitigation Measure J-1: Temporary "Truck Crossing" warning signs shall be placed in each direction in advance of the intersection of Stansbury Avenue and Valley Vista Boulevard.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by Applicant

Mitigation Measure J-2: A flag person or persons shall be positioned near the project site to assist truck operators in entering and exiting the project area, and to help minimize conflicts with pedestrians and other motorists.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by Applicant

Mitigation Measure J-3: To the greatest extent possible, the arrival and departure of construction trucks shall be minimized during peak student arrival and departure periods, and peak commuter periods.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by Applicant

Mitigation Measure J-4: Transportation Demand Management (TDM) Plan – Implement an enhanced TDM Plan for the School that increases the use of carpooling, public transportation, bicycling, and privately operated bus and shuttle services. The goal of the TDM Plan shall be to reduce project-related trips so that School-related vehicular traffic throughout the day remains at existing levels.

At a minimum, the TDM Plan shall reduce project-related trips during the A.M. peak hour by at least 75 trips, resulting in no increase to the existing A.M. peak-hour trip generation level, and a reduction of at least 4 project trips during the School P.M. peak hour. Additionally, although not required as mitigation, the School has volunteered to reduce project-related daily trip generation of 278 vehicle trips by at least 40 percent (i.e., a minimum of 111 trips). Aside from the required reduction of 75 trips during the A.M. peak hour and 4 trips during the School P.M. peak hour, the remaining reduction of 32 trips (i.e., 111 – 75 – 4 = 32) may be achieved during any time of the School day.

Additionally, although not required as mitigation, to further reduce impacts the Applicant also volunteers to reduce existing School-related trip generation by five percent during the A.M. peak hour as well as the School P.M. peak hour

as part of the TDM Plan. This reduction shall be applied to the existing trip generation levels of 702 trips during the A.M. peak and 443 trips during the School P.M. peak, as detailed in Appendix L (Sub-Appendix C) of the Draft EIR, thus yielding A.M. and P.M. peak generation levels of 667 trips and 421 trips, respectively.[150] This reduction shall be phased over the course of three years, beginning in the school year following project approval.

A draft of the proposed TDM Plan is provided in Appendix 3 of this Final EIR. The final TDM Plan shall be developed in consultation with LADOT. After initial implementation, this Plan may be refined as appropriate to achieve the required and desired trip reductions. This plan shall be resubmitted annually at the beginning of the School year for approval by LADOT, until such time that this procedure is no longer required by LADOT.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Project operation

Monitoring Frequency: Annually, until LADOT determines that submission of the TDM Plan is no longer required

Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by the Applicant

Mitigation Measure J-5: Ventura Boulevard and Stansbury Avenue – Widen Stansbury Avenue by 10 feet along the east side of Stansbury Avenue between Ventura Boulevard and the alley south of Ventura Boulevard.[151] Restripe Stansbury Avenue to provide one exclusive left-turn lane and one exclusive right-turn-only lane in the northbound direction.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Bureau of Engineering

Monitoring Phase: Project operation

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[150] *These five percent peak-hour reductions total 57 trips [(702 - 667) + (443 - 421) = 57]. In combination with the required A.M. peak-hour reduction of 75 project trips and the required School P.M. peak-hour reduction of 4 project trips, this reduction would exceed the voluntary 40 percent reduction in project-related daily trip generation, while also reducing School-related vehicle trips during peak hours to less than existing levels.*

[151] *These transportation improvements shall be guaranteed through the B-permit process of the Bureau of Engineering, Department of Public works. Any improvements shall be constructed and completed before the issuance of the final certificate of occupancy, to the satisfaction of DOT and the Bureau of Engineering. Prior to setting the bond amount, the Bureau of Engineering shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator to arrange a pre-design meeting to finalize the design for the required transportation improvements. Additional street improvements may be required. The Applicant should contact the Bureau of Engineering, Department of Public Works to determine any other requirements. Any street dedication shall be completed through the Department of Public Works, Bureau of Engineering, Land Development Group, before the issuance of any building permit for this project.*

Monitoring Frequency: Field inspection following project completion

Action Indicating Compliance with Mitigation Measure(s): Approval of street improvement

Mitigation Measure J-6: Valley Vista Boulevard and Stansbury Avenue – Stripe southbound Stansbury Avenue and eastbound Valley Vista Boulevard to each provide one left-turn/through shared lane and one right-turn-only lane in the southbound and eastbound directions.[152] The removal of approximately three on-street parking spaces would be required along the west side of Stansbury Avenue north of the intersection, in addition to approximately one to two on-street parking spaces along the south side of Valley Vista Boulevard west of the intersection.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Bureau of Engineering

Monitoring Phase: Project operation

Monitoring Frequency: Field inspection following project completion

Action Indicating Compliance with Mitigation Measure(s): Approval of street improvement

Mitigation Measure J-7: Stansbury Avenue – All student drop-off and loading shall take place entirely on-site, without any on-street student drop-off. The School shall prepare a student drop-off and pick-up plan to be reviewed by the LADOT district office. The plan shall include provisions for staggered drop-off and pick-up hours so as to reduce queuing on-site. The plan shall also include provisions for penalties for parents who do not follow the drop-off and pick-up rules. The plan shall also include a site plan of the school with the drop-off and pick-up areas clearly designated.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; project operation

Monitoring Frequency: Plan check; field inspection

Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by Applicant

[152] *This mitigation measure, which was required by LADOT in its traffic assessment letter (included as Appendix L-1), reflects a slight variation from the mitigation measure for this intersection recommended in the traffic study, but mitigates significant impacts at the intersection to a less than significant level to generally the same degree.*

Mitigation Measure J-8: Traffic Monitoring Compliance Report – Per the LADOT approved TDM Plan, the applicant shall be required to hire a licensed traffic engineer as a consultant to conduct traffic trip counts at the School and submit a Compliance Report to LADOT during the fall of each year. The applicant shall be required to submit the fall Compliance Report before the end of November of each year. Such reports shall conform to requirements provided by LADOT. If the average of the trip counts indicate that the School exceeds its trip ceilings of 2,770 daily trips, 667 A.M. peak hour trips or 421 School P.M. peak-hour trips, which represent both mandatory and voluntary trip reductions, the School shall conduct new counts and submit a spring Compliance Report before the end of April of each year. In the event that the applicant is not in compliance with the trip ceilings in the spring Compliance Report, the applicant shall be required to pay a $1,000 (one thousand dollars) penalty to the City of Los Angeles for each A.M. and School P.M. trip that the School generates in excess of its trip ceilings or reduce the student enrollment for the following school year an amount equal to the number of A.M. and School P.M. trips exceeded during the previous year. If the project trip generation proves to be in compliance with the established trip ceilings for five consecutive years the applicant shall no longer be required to submit the Compliance Reports to LADOT.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Project operation

Monitoring Frequency: Annually until compliance is demonstrated for five consecutive years; thereafter only if trip ceilings are not met.

Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by the licensed traffic engineer

Mitigation Measure J-9: Site Access and Circulation - All loading and unloading of students must be accomplished on-site. The reservoir space for dropping off or picking up students must be large enough so that vehicles do not encroach onto the City right-of-way. It needs to be substantially in conformance with the design submitted to DOT on August 4, 2006 as part of the On-Site Queuing Capacity Analysis.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction

Monitoring Frequency: Plan check

Action Indicating Compliance with Mitigation Measure(s): Plan approval

Mitigation Measure J-10: Site Access and Circulation - Final DOT approval shall be obtained regarding the project's driveways, internal circulation and parking schemes prior to issuance of any building permits. This should be accomplished by submitting detailed site and driveway plans, with a minimum scale of 1"-40', to DOT's Valley Development Review Section.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction

Monitoring Frequency: Plan check

Action Indicating Compliance with Mitigation Measure(s): Plan approval and issuance of building permits