

Tom Brohard and Associates

July 28, 2015

Douglas P. Carstens, Attorney at Law
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SUBJECT: Archer School Project – Continuing Traffic Issues

Dear Mr. Carstens:

My April 25, 2014 letter commented on traffic, access, and parking issues in the DEIR associated with the proposed expansion of the Archer School. As detailed in my December 3, 2014 letter regarding the FEIR, several of these issues remain. This letter addresses the need to reanalyze the compressed construction schedule that is now deferred to start in 2017 as well as the faulty mitigation “limitations” proposed for arrivals and departures at the parking structure.

Compressed Construction Schedule Beginning in 2017

The Archer School Project, originally planned for construction over six+ years, has recently been modified to a compressed three-year construction period, with only minor reductions in the scope of the expansion. Furthermore, the start of construction has been deferred to the summer of 2017 when another proposed school expansion together with other projects may also contribute significant construction traffic in the immediate area. Errata 2 dated April 2015 claims to analyze the compressed three-year construction schedule starting in summer of 2017 but no data or analyses are presented to support the claim of “no new significant construction traffic impacts.”

Errata 2 presented the compressed three-year construction period but it does not include the number of construction trips by vehicle type for each phase of all components of the school expansion, basic information required for proper analyses of traffic impacts. With a compressed three-year schedule, construction phases and the associated construction vehicle trips will overlap rather than being stretched out over six years. The following four steps are required to properly identify, analyze, and mitigate the traffic impacts of the modified project construction schedule on Sunset Boulevard and other roads and intersections:

- 1) Determine Current Traffic Volumes – The EIR speculated that traffic volume and congestion increases on Sunset Boulevard and other roadways and intersections were related to construction of the HOV lanes on the I-405 Freeway. Rather than relying on those potentially faulty

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assumptions, new traffic counts must be taken after schools resume in September 2015 to properly identify the current baseline traffic volumes.

- 2) Determine Baseline Traffic Volumes during Construction – Archer School construction is now planned to begin in summer of 2017 and is forecast to last three years. Traffic volumes to be counted in September 2015 must be projected forward to the beginning of construction in summer of 2017 as well as during peak construction vehicle trips occurring during the following three years. Construction trips related to other reasonably foreseeable projects in the area with concurrent construction schedules such as the Brentwood School Education Master Plan (36,500 square foot school building above a subterranean parking garage located at Sunset Boulevard and Barrington Place) must be included in the future baselines for each of the years of construction of the Archer School Project.
- 3) Develop Passenger Car Equivalent Construction Trips for Archer School - An update of EIR Appendix C-2 which assumes 74 to 75 months of construction is required to determine the additional numbers of construction vehicle trips that will be generated during the compressed three-year construction schedule. The numbers of these construction vehicle trips must be converted to passenger car equivalents (PCE - i.e., five axle trucks are considered to be equal to at least 3 passenger cars). The equivalent number of passenger car trips at the beginning of Archer School construction and during peak construction activities must be developed for the compressed schedule.
- 4) Develop Appropriate Mitigation Measures during Construction – PCE trips for the various phases of construction must then be distributed to the roadway network at critical intersections and on roadways such as Sunset Boulevard and added to the baseline traffic volumes during construction. Conditions without and then with Archer School construction trips must then be compared and evaluated in accordance with the LADOT thresholds to determine the locations of significant construction traffic impacts. Feasible and enforceable mitigation measures must then be developed and monitored during construction to eliminate the significant construction traffic impacts.

Errata 2 dated April 2015 concludes that compression of the six year construction period into three years beginning in 2017 will not create any additional significant construction traffic impacts. No data or analyses have been provided to support these claims. Without updated analyses that match what is now proposed, the previously proposed mitigation measures do not properly identify or address the resulting significant traffic impacts created by the revised construction schedule.

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“Limitations” on Arrivals and Departures Are Faulty

Limitations on arrivals and on departures at the Archer Campus parking structure will not reduce trips that will occur as guests will come to the area to attend an event ready to enter the structure at 7:00 PM when there are no limitations on the count. The FEIR confuses the capacity of and hourly limitations at the parking structure with the trips that will be generated by the special events. Limiting arrivals does not and will not limit departures. While the FEIR has backed into numbers that theoretically eliminate significant traffic impacts, the proposed mitigation measures are not feasible or practical, and they will not produce the arrival and departure limitations that are required to eliminate significant traffic impacts. (Please see Pages 2-4 of my December 3, 2014 rebuttal to the FEIR enclosed).

Events at Archer School will also create extended peak hours that have not been studied. Traffic generated by these events will travel through the adjacent neighborhoods and on major roadways and intersections both before and after the events are held at the school. While there are “limitations” on arrivals and departures at certain times at the parking structure, there are no limits for departures after the weekday events after 7:00 PM.

The changes in the construction schedule as well as the proposed “limitations” on arrivals and departures require further study, analysis, and explanation in a revised and recirculated EIR before the City of Los Angeles considers the Archer School Project. If you have questions regarding these comments, please call or email me.

Respectfully submitted,

Tom Brohard and Associates

Tom Brohard

Tom Brohard, PE
Principal



Enclosure

December 3, 2014 Letter – Rebuttal to FEIR