HESCHEL WEST DAY SCHOOL

COUNTY PROJECT No. 98-062
CONDITIONAL USE PERMIT No. 98-062
SCH No. 1998101060

Final

SUPPLEMENTAL ENVIRONMENTAL ANALYSIS OF PROPOSED INTERIM SCHOOL STUDENT CARPOOL/BUSING PLAN

Prepared for:

County of Los Angeles

November 2007

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Prepared for:

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November 2007

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1.0 INTRODUCTION

1.1 ENVIRONMENTAL REVIEW PROCESS

As defined by Section 15050 of the *California Environmental Quality Act (CEQA) Guidelines*, the County of Los Angeles is serving as "Lead Agency," for the project. In this role, the County of Los Angeles conducted an Initial Study and determined that an Environmental Impact Report (EIR) should be prepared. As a result, a Notice of Preparation (NOP) was circulated in October 1998 for the required 30-day review period. The County's Initial Study was also circulated with this NOP to provide additional information on the project to public agencies and other parties reviewing the NOP.

The original Draft EIR was made available on October 28, 2002 through December 11, 2002 for a 45-day public review and comment period as mandated by CEQA. During the public review period, interested public agencies and private parties submitted written comments concerning the adequacy of the document to the County of Los Angeles, Department of Regional Planning. Two public hearings, at which time public testimony was heard, were held before the Los Angeles County Regional Planning Commission in March and May 2003 to consider the proposed project, the requested entitlements, and the adequacy of the original Draft EIR. At the conclusion of these public hearings, the Los Angeles County Regional Planning Commission requested that issues raised by that testimony be addressed in a revised and recirculated Draft Supplemental EIR consistent with the procedural requirements of Section 15088.5 of the State *CEQA Guidelines*.

The Revised Draft EIR was circulated for a 45-day public review period as required by state law beginning April 4, 2005 and running through May 18, 2005. Comments on the Revised Draft EIR were accepted through the final public hearing in September 2005. The County of Los Angeles received written comments on the Revised Draft EIR during this period. Pursuant to Section 15088 of the State *CEQA Guidelines*, the Lead Agency evaluated comments on environmental issues received from persons who reviewed the Draft Supplemental EIR and prepared a written response addressing each of the comments.

On June 28, 2006 the County's Regional Planning Commission (RPC) unanimously approved the issuance of a conditional use permit to authorize the construction and operation of a private school at the site, with a maximum of 750 students (the Project). The RPC's approval of the Project and certification of the EIR has been appealed to the County Board of Supervisors (the Board). Moreover, in the months following Project approval, the California Department of Transportation (Caltrans) formally identified its requirements regarding the design, review, and approval of the recommended traffic improvements that

fall under its jurisdiction. Based on those requirements, the timing for construction of intersection improvements associated with the Project would take place beyond the desired occupancy date.

Given the circumstances, the Board directed preparation of an "Interim School" option that would allow the school to begin operation with a student population of 390 students. This solution required the school to develop an interim traffic plan that fully mitigates all project-specific tertiary, and cumulative traffic impacts, provides an enhanced, measurable, and enforceable busing and/or carpooling program, and includes the evaluation of alternative access routes including but not necessarily limited to a one-way egress at Chesebro Road. Based on the Board's direction, a carpool/bussing plan and Supplemental Environmental Analysis (SEA) was prepared to consider operation of the school under this "Interim" condition, and was circulated for a 45-day public review from October 1, 2007 through November 14, 2007. Responses to comments on environmental issues raised on the SEA have been prepared and are included herein for consideration.

The purpose of this document is to provide discussion and clarification in response to comments received on the Supplemental Environmental Analysis of Proposed Interim School Student Carpooling/Busing Plan. The Supplemental Analysis is a focused analysis, separate from, and subsequent to, the preparation of the Heschel West School Environmental Impact Report (the EIR). The SEA examines the feasibility of opening the Heschel West Day School (the School) for use, on a limited basis, prior to the ultimate build out of the School.

1.2 COMMENTING PARTIES

A list of those agencies, organizations, and interested parties that commented on the Supplemental Analysis is provided below. A copy of each comment letter, and a response to each specific comment, follows this list.

a. Local Agencies

1. Craig A. Steele, Richards, Watson, Gershon Attorneys at Law
   Letter dated November 14, 2007
2. County of Los Angeles Department of Parks and Recreation
   Letter Dated November 14, 2007

b. Interested Parties

3. Jess Thomas, President, Old Agoura Homeowners Association
   Letter dated November 14, 2007

2.0 PROJECT DESCRIPTION

At the direction of the Board, the applicant has prepared an Interim School Project. The Interim School Project includes a student body of 390 students and completely mitigates all project-specific, tertiary, and cumulative traffic impacts. The Interim School Project includes limited occupancy, at a maximum of 390 students in grades pre-K through 5th Grade and would include the development of associated buildings and recreational facilities described in the EIR under Phase I or Phase II. Mitigation measures include a measurable and enforceable busing and/or carpooling program (the Carpooling/Busing Plan). The Carpooling/Busing Plan, as described in the SEA and outlined in Table 1 of the Traffic Impact Analysis, specifies inbound, outbound, and total allowable vehicle trips during each of eight specific time periods throughout the day. The School will be required to comply with each of these trip cap allowances.

The Carpooling/Busing Plan includes a monitoring program to the Interim School Project adheres to the vehicle trip limits and will not exceed traffic impacts attributable to the project on streets in the surrounding area. The monitoring and enforcement program will be incorporated into the project's overall California Environmental Quality Act mitigation monitoring and reporting program (MMRP). The monitoring program will include monthly compliance checks through random, unannounced traffic counts conducted over three consecutive days by a County or County-approved traffic consultant (Tier One Count). If violations are detected in the Tier One Count, a follow-up Tier Two Count will be performed within 15 days. If the Tier Two Count reveals noncompliance, the School will be subject to a fine of $100 per vehicle trip in excess of the daily trip caps. If, over the course of a semester, four or more Tier One Count violations or two or more Tier Two Count violations are detected, the maximum permitted student enrollment for the subsequent school year will be reduced. Further, on a yearly basis, prior to the start of the school year, the School shall submit a transportation management program to the County Department of Public Works.

In addition to the monitoring program, two important physical components of the Carpooling/Busing Plan include a one-way loop for site access, involving one-way ingress at Canwood Street and one-way egress at Chesebro Road and an alternative location for vehicular access to and from the School, along the east side of Palo Comado Canyon Road approximately halfway between the 101 Freeway's northbound on/off ramps and the intersection of Palo Comado Canyon Road with Driver Avenue and Chesebro Road (the Mid-Block Access).

The SEA also examines the School's most recent plans for grading in connection with the two proposed access routes for the School—the access proposed in the EIR, immediately north of Canwood Street (the Canwood Access) and the Mid-Block Access described above. The refined grading plans for the

Canwood Access involve a 7 percent grade and retaining walls no taller than 10 feet and the grading plans for the Mid-Block Access roadway involve a landscaped sound-attenuating berm along the northern edge of the roadway, a landscaped median wall, and a landscaped bench drain south of the roadway.

3.0 COMMENTS AND RESPONSES

This section of the Final EIR contains copies of all written comments received on the Supplemental Environmental Analysis (SEA) and is followed by written responses to these comments as required by *California Environmental Quality Act (CEQA) Guidelines* Section 15088.

Letter No. 1

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November 14, 2007

VIA FACSIMILE (213) 626-0434
AND MESSENGER

Dr. Hsiao-Ching Chen
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Los Angeles, California 90012

Re: County Project No. 98-062, CUP No. 98-062, SCH No. 1998101060 – Comments on the Supplemental Environmental Analysis of Proposed Interim School Student Carpool/Busing Plan, dated September 2007

Dear Dr. Chen:

I serve as City Attorney for the City of Agoura Hills (the "City"). I write on behalf of the City to submit comments on the Supplemental Environmental Analysis of Proposed Interim School Student Carpool/Busing Plan, dated September 2007 (the "Supplemental Environmental Analysis"). This letter compiles comments authored by the City Engineer, City Traffic Engineer and Planning Department with my own comments to present all the City's comments in one document.

Unfortunately, like the previous draft EIR, the Supplemental Environmental Analysis is both conclusory and lacks sufficient detail to allow the reader to evaluate the environmental analysis in a meaningful way. Both statutory authority and case law clearly establish that the "EIR is the heart of CEQA." 14 Cal. Code Regs. § 15003(a); *County of Inyo v. Yorty*, 32 Cal. App. 3d 795, 810 (1973). In connection therewith, the CEQA Guidelines (codified at 14 Cal. Code Regs. §§ 15000 *et seq.*) require that a lead agency provide written responses to comments received on a project, and "describe the disposition of significant environmental issues raised (*e.g.*, revisions to the proposed project to mitigate anticipated impacts or objections)." 14 Cal. Code Regs. § 15088(c). Further, the lead agency must provide a "good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice." 14 Cal. Code Regs. § 15088(c) (emphasis added). Finally, "[d]ocuments prepared pursuant to this division [must] be organized and written in a manner that will be meaningful and useful to decisionmakers and to the public." Pub. Res. Code § 21003(b). 1

This requirement exists to further the goals of CEQA, including "inform[ing] … the public about the potential, significant environmental impacts of proposed activities." 14 Cal. Code Regs. § 15002(a)(1). Accordingly, "conclusory responses unsupported by empirical information, scientific authorities or explanatory information have been held insufficient to satisfy the requirement of a meaningful, reasoned response: conclusory responses fail to crystallize issues, and afford no basis for a comparison of the problems caused by the project and the difficulties involved in the alternatives." *Environmental Protection Information Center, Inc. v. Johnson*, 170 Cal. App. 3d 604, 628 (1985). 1

As was the problem with all of the previous drafts of the project's EIR, the Supplemental Environmental Analysis is conclusory and fails to provide enough information for the reader to evaluate the effectiveness of proposed mitigation measures. Proposed mitigation measures are not tied to specific impacts, and there is nothing more than a conclusory statement of impacts after mitigation without specific data. In addition, we provide more specific comments on the Supplemental Environmental Analysis below.

1. The project description is the Carpool/Busing Plan for the 390-student interim school with either a mid-block or one way loop access. The conclusion in the Supplemental Environmental Analysis improperly supports avoidance of traffic mitigation, and implies support for the loop access, which is the least popular access for the City. The Supplemental Environmental Analysis concludes that there would be no significant traffic impacts associated with either the mid-block or loop access because the carpooling program reduces the number of trips to well below any level of significance. This assumes that the carpooling program is 100% effective, without giving the necessary details of how the carpooling program and its implementation. Moreover, the Supplemental Environmental Analysis fails to include required mitigation measures for either access alternative. 2

In addition, another option, to provide either a signalized intersection or a roundabout at Canwood/Palo Comado Canyon and the freeway on/off ramps, is dismissed because the outbound (westbound) traffic triggers mitigation, and so is relegated to a later date with full buildout. This improperly defers mitigation in violation of CEQA. 3

2. The project description section is missing from the Supplemental Environmental Analysis. The Supplemental Environmental Analysis relies heavily on carpooling/busing to achieve reductions in traffic impacts and to come to 4

conclusions. Thus, a full and detailed description of the carpool and busing plan should be provided here, as opposed to scattered details provided in Section 2.0 and in the Appendix. This would help the City and other members of the public to analyze the carpooling/busing program's validity and efficacy. 4

3. The text in this Supplemental Environmental Analysis is not supported by information in the technical appendices, and there are internal inconsistencies (see detailed comments below).

4. The transmittal letter that accompanied the Supplemental Environmental Analysis notes that the document was prepared not only due to project changes associated with the interim school project with the carpool/busing plan, but also due to lowered pad elevations, reduced development footprint, increased natural open space setback, and revised phasing plan. However, the Supplemental Environmental Analysis does not describe or analyze these other items. A full discussion and analysis of potential impacts, along with mitigation measures, should be provided, as required by CEQA. 5

5. Given the changes in topography and grading with either the one way loop road access option or mid block access option, the potential impacts to aesthetics from hillside grading should be discussed and analyzed in the Supplemental Environmental Analysis. As part of the analysis, photometric studies, line of sight studies, building elevations, and landscape plans should be evaluated. 6

6. With this interim school plan, considering that the campus would mostly consist of temporary buildings for a longer period of time than anticipated in the 2006 EIR, additional description and analysis of the "shelter in place" concept for wildland hazards should be provided herein. Where would the "shelter in place" facility be located in the interim project? Also, additional analysis of impacts to evacuation paths should be included herein, especially considering that with the one way loop road access, many more school generated vehicle trips would be traveling along Chesebro Road, north of the intersection with Canwood, Driver and Palo Comado Canyon Road, than anticipated in the 2006 EIR. This road is a two-lane local access road for residential uses in the semi-rural portion of the City. 7

In addition, the City believes that the long term mitigation measures should be specifically spelled out now as conditions of approval for the Project. 7

Section 1.1 PURPOSE AND BACKGROUND

7. Page 3 states: "this Supplemental Analysis also provides an opportunity for public review and comment on the School's most recent plans for grading in connection with the creation of a campus access roadway in one of two locations – either immediately north of Canwood Street (the "Canwood Access"), or the Mid-Block Access…." While reduced copies of the plans are provided in the Appendix, these plans are illegible due to scale and poor copy quality, and therefore do not provide a clear understanding of the proposed grading. The potential impacts of the grading plans are not discussed in the environmental document. The Supplemental Environmental Analysis must be revised to analyze this issue and recirculated with a legible grading plan. 8

Some of the proposed grading, berms, drains and retaining walls may be located within City jurisdiction and require City permits, and therefore coordination with the City is important at the earliest feasible date. The Supplemental Environmental Analysis should note the City's role. In summary, the grading information provided in the Supplemental Environmental Analysis is inadequate under CEQA. This section notes that the Canwood access road would have a seven percent grade and maximum retaining wall height of ten feet. Is this consistent with County standards? The maximum allowable retaining wall height in the City is six feet.

Section 2 TRANSPORTATION AND ACCESS

8. Page 7, last paragraph, indicates that a roundabout is the same as a traffic circle. This is not the case and should be clarified in the document. The following are attributes of a roundabout:

- Yield at Entry - At roundabouts the entering traffic yields the right-of-way to the circulating traffic. This yield-at-entry rule prevents traffic from locking-up and allows free flow movement. 9

- Deflection - The entry and center island of a roundabout deflects entering traffic to slow traffic and reinforce the yielding process.

- Flare - The entry to a roundabout often flares out from one or two lanes to two or three lanes at the yield line to provide increased capacity.

As a comparison, a traffic circle is stop controlled, and the right of way is given to vehicles entering the circle. Roundabouts tend to be safer and less congested than traffic circles, and the current trend is to replace traditional traffic circles with the modern roundabout. It is our understanding that a roundabout is being considered regarding this project, not a traffic circle. If this is not the case, please clarify. 9

9. Each of the traffic mitigation measures (1-10) listed under subsection 2.1 (Summary of Traffic Related Impacts Identified in the 2005 EIR) fails to explain the effect of each respective mitigation measure on a given impact. Again, subsection 2.1 fails to provide enough information to allow the reader to evaluate the effectiveness of the proposed mitigation measure. As was the case with the previous draft EIR, thresholds of significance are not sufficiently defined in the Supplemental Environmental Analysis. The significance of impacts after mitigation is not compared to a threshold of significance, and there is nothing more than a conclusory statement of impacts after mitigation without specific data tied to them. Without the clear determination of the threshold of significance, the reader can have no confidence that these proposed mitigation measures will result in insignificant impacts. 10

10. Page 12 lists five intersections most likely to be affected by traffic generated by the proposed student busing/carpooling program. It is not clear why these are the only intersections, and why the full range of intersections looked at in the EIR also does not apply here. In fact, the fourth paragraph on page 16 appears to contradict what is implied on page 12, as it states, "[a]lthough these alternative access scenarios result in slight modifications of the School traffic distributions at two of the study intersections (Driver Avenue/Palo Comado Canyon Road at Canwood Street/Chesebro Road, and Dorothy Drive and the US-101 Southbound Freeway Ramps), as compared to the original study appended to the EIR, the overall travel patterns for School traffic adhere to those identified in the approved traffic analysis, and do not present a significant departure from those assumptions." Further justification and explanation needs to be provided. 11

11. As evidenced on pages 11-12 and page 13, since completion of the 2006 EIR, the applicant appears to have as its primary goal the avoidance of any possible cost or delay to the applicant at the expense of ensuring that the project's impacts to the 12

environment are adequately mitigated as required by CEQA. Mitigation measures found to be required in the EIR, and adopted by the County Regional Planning Commission, have been determined to "unnecessarily further delay occupancy of the School in the short term." (p. 13, 2nd bullet). This is an inappropriate approach to project review and environmental analysis, and indicates a strong bias on the part of the County to see that the interim project gets approved regardless of the effects on the local community.

It is now well established that a lead agency may not defer formulation of mitigation measures. *See, e.g., Fairview Neighbors v. County of Ventura*, 70 Cal. App. 4th 238, 244 (1999); *Sundstrom v. County of Mendocino*, 202 Cal. App. 3d 296, 307 (1988). Such deferral runs counter to the CEQA policy of identifying impacts "as early as feasible in the planning process to enable environmental considerations to influence project program and design…." 14 Cal. Code Regs. § 15004(b). 12

Additionally, it is important to identify mitigation measures prior to project approval since mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments (14 Cal. Code Regs. § 15126.4(a)(2)); if the applicant does not know exactly what mitigation measures will be required, it might be unwilling to commit to implementation of those measures after the project has been approved. Moreover, a commitment to pay fees without any evidence that mitigation actually will occur is inadequate. *See Save Our Peninsula Committee v. Monterey County*, 87 Cal. App. 4th 99, 140 (2001).

Here, the County and the applicant have improperly deferred mitigation in connection with the Project.

12. Starting on page 16, the document describes the interim school project trip generation estimates. The data was apparently provided by the applicant. Although the text does not specify, this information presumably is derived from the two studies prepared by Hirsch/Green Transportation Consulting found in the Appendix. Some of the assumptions identified are questionable, and the Supplemental Environmental Analysis fails to explain how these assumptions were reached. 13

First, the Supplemental Environmental Analysis provides that the "*[t]rip generation for faculty/staff was assumed to reflect the following characteristics; all 71 faculty/staff would 'drive alone' to the site, although an average vehicle occupancy (AVO) of approximately 1.2 persons per vehicle (based on general travel*

characteristics in the Southern California region) was also assumed, indicating some nominal level of potential site-related carpool activity. This assumption resulted in an estimated total of approximately 59 faculty/staff-related vehicles." This analysis is confusing – if all faculty and staff are assumed to drive alone, why is a factor of 1.2 persons per vehicle assumed? It is a fair assumption that faculty/staff would not be carpooling. Given the inherent nature of carpool/busing programs as being difficult to enforce and prone to infractions, if a busing/ carpooling program is being proposed as not resulting in any significant traffic impacts, such a busing/carpooling program should be conservative in its assumptions.

Second, it is highly optimistic to assume that 20 percent of the faculty/staff would be dropped off and picked up. This figure should be much lower. Moreover, there is no evidence or data to support why this assumption is justified. The Supplemental Environmental Analysis fails to provide sufficient detail of the busing/carpooling program, aside from the assumptions on who would be bused or carpooled, and how the plan would be monitored. Further information needs to be provided on how the school will require families to carpool or bus. The Supplemental Environmental Analysis fails to answer the following questions, at minimum: 13

- Will there be an incentive program?
- If the program will be presented to the families as mandatory, what enforcement would the school impose for failure to comply?
- How will the school monitor compliance? Enforcement should be internal - the school itself – as a first tier, and external – the County – as a second tier.
- How many buses will be provided and where will the bus pick up locations be distributed?
- Has Hirsch/Green Transportation Consulting or the County prepared other similar plans for Pre K – 5th grade schools in similar settings, and have the plans been effectively implemented? If not, what other similar school plans were consulted and have these been effectively implemented?
- How does the Heschel West Day School compare with the other schools?

The feasibility of such a plan and ensuring that it be implemented accurately has not been discussed in the document, but it is necessary that the Supplemental Environmental Analysis do so. The entire conclusion of no significant traffic impacts rests on the assumption that there will be 100 percent compliance each day with the plan at any level of student population. The basis for this assumption is not provided

or explained in the Supplemental Environmental Analysis, and we believe that this assumption is unreasonable. 13

Moreover, the vehicle trip monitoring program outlined in Section 2.4, requires monthly traffic counts by the County or a County approved traffic consultant. This seems inadequate. In between the monthly inspection, the program could be disregarded on a daily basis. A certainty of compliance should be built into the program, with the school's plan for enforcement outlined and provided in the Supplemental Environmental Analysis. The Traffic Impact Analysis Report dated March 2007 found in Appendix B indicates on page ii that, "prior to occupancy of the interim School, a detailed and specific carpool/bus plan, based on the specific School enrollment and faculty/staff and student enrollment information at the time of occupancy, will be prepared and submitted to the Director of Planning and the Department of Public Works for review and input." The specific carpool/bus program should not be delayed until "prior to occupancy." The program is not a mitigation measure, but the project itself. Details regarding the program, therefore, cannot be developed at a later time, but must be fully developed in order to analyze adequately in this CEQA document. In particular, the program as provided lacks significant detail in how the school will initiate and enforce the program on a daily basis. As explained under Comment #11, a lead agency may not defer formulation of mitigation measures. 14

13. The first paragraph on page 21 states that *"[t]he potential for additional delay is noted in the original traffic analyses, and would be alleviated through installation of new traffic signals. However, the City of Agoura Hills has voiced objections to installation of traffic signals in the study area due to the rural nature of the vicinity...."* It is not clear to what this sentence is referring. Is this statement implying that the interim project would result in impacts to the street system that would warrant signalization? If so, this is contrary to the conclusion reached in Section 2.5 that the project would not result in significant traffic impacts. 15

While the City would prefer not to install signals in this area, if possible, other lane improvements mentioned in the EIR at each of the intersections of concern would be acceptable, and the City has repeatedly indicated its preference for the non-signal options proposed in the EIR as mitigation measures. If these non-signal improvements are needed with the interim project, it should be clearly stated herein and the impacts and mitigation measures identified.

14. On page 24, it is not clear what the conclusion is regarding "Analysis of Future (2010) Cumulative Impacts." Please provide a full impact analysis and discussion of any applicable mitigation measures. 16

15. Beginning on page 24, the vehicle trip monitoring program is described. The following comments relate also to Comment #12 above. The program provides only monthly monitoring, and allows for four or more Tier One Count violations and two or more Tier Two County violations before the school would be required to reduce the maximum permitted student enrollment for the following year. This determination is made at the end of the fall semester each year. There are several major concerns with this program as presented:

- First, violations of the carpooling/busing program can occur at times when the monitoring is not being performed, and they will not be tracked;
- Second, even if there is non-compliance during the Fall semester, and fines are assessed, there can continue to be violations;
- Third, the last enforcement level is to require the school to reduce its enrollment the following year (*i.e.*, an enforcement that only takes effect nine months later). In the meantime, non-compliance can occur and fines can continue to be assessed;
- Fourth, the requirement to reduce enrollment would be extremely unpopular, given that the school would need to tell some students that they cannot return to the school the following year and continue on to the next grade. Therefore, the effectiveness of this approach is highly questionable and improbable; 17
- Fifth, the ratio of 2.5 students per vehicle as the goal for carpooling/busing seems high, and there is no reasonable explanation for how this ratio was calculated and reached.

All of these items demonstrate how illusory the carpool/busing plan really is, and how many opportunities there are for the plan to fail on any given day. There are too many ways the plan can be violated without being corrected immediately, such that more vehicle trips would actually be on the local streets and at the study area intersections than are anticipated in the traffic analyses. To be more accurate, the traffic analysis should factor in a large number of violations of the carpool/busing plan. This points to the need to have physical traffic improvements be implemented prior to the school's opening, along with the busing/carpooling program so that the mitigation is effective. As it now stands, the effectiveness of the busing/carpooling program at eliminating vehicle trips in the area has not been demonstrated, and

therefore the "self-mitigation" of the project does not actually provide adequate mitigation per CEQA. A more effective mitigation program for the interim school project needs to be worked out, in conjunction with the City.

16. Page 15, 4th paragraph states, "[a]ny interim occupancy program would, of necessity, need to avoid significant traffic impacts that would require installation of any such mitigation improvements." Page 26, last paragraph, concludes that the proposed interim project would operate without causing any significant traffic impacts. As such, no mitigation measures are proposed in this document. However, Appendices A and B contain letters dated September 12, 2007 and May 14, 2007 from Mr. William Winter of the County Traffic and Lighting Division of the Public Works Department responding to the applicant's analysis of the mid block access option and carpool/busing plan, and the loop road access option and carpool/busing plan. 17

Specifically, the September 12, 2007 letter states that, "we agree with the plan that the traffic generated by the proposed interim project will not result in a significant impact at any of the surrounding roadways or intersections." The letter goes on to say that the project shall be solely responsible for the following:

- *The applicant shall be responsible for paying the full amount of the Arterial Street System Development Fee specified in the City of Agoura Hills Municipal Code prior to issuance of any building permit. The applicant shall verify with the City if any of their roadwork or other traffic mitigation measures can be used to offset this Arterial Street System Development Fee.*

- *The applicant shall enter into a secured agreement with the County to ensure the funding for the ultimate access to the site as conditioned under the CUP 98-062-(3) prior to issuance of any building permit.* 18

- *The applicant shall be responsible for the design and construction of the new interim signalized Mid-Block access driveway at Palo Comado Canyon Road prior to issuance of occupancy.*

- *The applicant shall improve the west side of Palo Comado Canyon Road from Canwood Street/Chesebro Road to the westbound U.S. Highway 101 on-ramp to a 32 feet half roadway improvement prior to issuance of occupancy.*

With regard to these items, what is meant by the "new interim signalized Mid-Block access driveway"? The Supplemental Environmental Analysis does not indicate that a signal is necessary as part of the interim plan with the mid-block access. In fact, the document states that the interim project warrants no additional traffic measures. The Supplemental Environmental Analysis is inconsistent with the Appendix. Please confirm or clarify. The City would not support a signal at the mid block access. Additionally, the arterial fee amount to be paid shall be determined by the City of Agoura Hills, not the applicant or County, pursuant to the City's Municipal Code. 18

17. The Supplemental Environmental Analysis should consider whether, with the one way loop road, Chesebro Road would be able to adequately handle a school bus, given the width of this two-lane semi-rural road. 19

18. The Supplemental Environmental Analysis should evaluate the efficacy of the busing/carpooling plan if the hours of dismissal are staggered per grade, as indicated in this document. Is there a critical mass of students that must be achieved to guarantee the success of the busing/carpooling plan?

In addition, the City's traffic engineer, Jean Fares of Kimley-Horn and Associates, Inc., conducted research including all of Kimley-Horn's 63 offices nationally and reviewed known industry publications, and did not find any documentation that supports the carpool/busing assumption used in the Supplemental Environmental Analysis. After reviewing the methodology utilized for the Carpooling/Busing Plan, the City's traffic engineer concluded that the methodology used for the analysis is not common practice and does not meet industry standards. The traffic analysis must be revised utilizing more accurate trip generation numbers consistent with the trips generated by the existing school on Liberty Canyon. 20

19. Interim School Project Trip Generation Estimates - Page 18 – The second paragraph of the Supplemental Environmental Analysis states that *approximately 20 percent of the faculty/staff would be dropped of and picked up from the site by a spouse or other person as part of an off-site "ride-share" trip and that this assumption would result in an "outbound" faculty/staff trip component during the AM peak hour, and an "inbound" trip component during the afternoon periods, further producing a "worst case" trip estimate for faculty/staff at the School.* There is no reference in the Supplemental Environmental Analysis to support the basis for choosing 20 percent. More information is required to support this assumption. Please revise accordingly. 21

20. Analysis of Proposed Carpool/Busing Plan for Interim School - Page 18 – The last paragraph of the Supplemental Environmental Analysis states that the *analysis was based on the traffic study forecasts of "Future (2010) Without Project" (ambient traffic growth scenario) contained in the approved project traffic study appended to the Analysis Report, in order to provide a comparable assessment of potential interim trips versus the original "full enrollment" project impact analyses.* An analysis should be completed of bus program trips versus non-bus program trips in order to support this comparison assessment. The Supplemental Environmental Analysis should also state whether the existing school located at Liberty Canyon has buses and whether these buses would have the same route as the proposed Heschel school. 22

21. Analysis of Proposed Carpool/Busing Plan for Interim School - Page 19 – The first paragraph states that *in order to prevent "double counting" of the student related trips, the existing student trips were subtracted from the future conditions for the AM peak hour, PM School peak hour, and PM peak hour conditions.* Trip reduction is not reasonable since the existing school is at a different location (Liberty Canyon – east of Chesebro Drive exit on US-101) than the proposed Heschel school. The proposed Heschel school would add trips to different intersections other than those affected utilized by the existing school. 23

22. Analysis of Proposed Carpool/Busing Plan for Interim School - Page 19 – The second paragraph indicates that *no "existing student trip credits were assumed for the "off peak" time periods since no data was collected regarding the existing site trip generation during those times and although it is expected that some "off peak" trip activity currently exists, this assumption guarantees a "worst case" assessment of potential impacts during the "off peak" hours.* If an analysis is being done of the "worst case" scenario for the "off peak" time periods, the "worst case" scenario analysis should also be done for other peak periods and provided in the Analysis. 24

23. Analysis of Proposed Carpool/Busing Plan for Interim School - Page 19 – Table 2a – Interim Occupancy/Student Busing Program Trip Generation (AM – Pre-PM) provides the following data: 25

Proposed Uses	AM Peak Hour (7:00-8:15)		Post AM Peak Hour		Pre PM Peak School Peak Hour	
	In	Out	In	Out	In	Out
Students – Carpool	16	16	0	0	0	0
Students – Bused	11	11	0	0	0	0

25

Full enrollment AM trips are 720. The numbers represented in the Table 2a are more than 90% reduction. The document should present the trip generation for 390 students without carpooling/busing for comparison purposes.

24. Analysis of Proposed Carpool/Busing Plan for Interim School - Page 20 – Table 2b – Interim Occupancy/Student Busing Program Trip Generation (PM School Peak – PM Peak Hour) provides the following data:

Proposed Uses	PM School Peak School Hour (2:30-3:45)		Between PM School & PM Peak Hour		PM Peak Hour	
	In	Out	In	Out	In	Out
Students – Carpool	13	13	2	2	1	1
Students – Bused	9	9	0	0	0	0

26

Full enrollment trip generation is 508 students. The numbers represented in Table 2b are more than 90% reduction of this number. The document should present the assumption basis/source for this reduction.

25. Summary of Traffic Analysis for Interim School - Page 21 – Table 3 – Original Project versus Interim School Traffic Generation (with Carpool/Busing Plan)

Proposed Uses	AM Peak Hour		School PM Peak Hour		PM Peak Hour	
	In	Out	In	Out	In	Out
Interim Occupancy/ Student Busing	138	91	26	40	13	46

27

The AM Peak Hour number indicates " a peak period" which is two hours and not one hour as is being used in Table 3 for the analysis. Table 2a indicates 138 trips are for peak period of 7:00 AM to 9:00 AM; the number used in this table is only half of the peak period number (70 trips) which represents a reduction of approximately 351

trips from the original full enrollment number. This also applies to the School PM Peak Hour number. 27

26. Analysis of Interim School Impacts to Neighborhood Streets - Page 22 – first paragraph states that *the "net" new project traffic volumes also accounted for the removal of approximately 135 daily trips along the Driver Avenue/Palo Comado Canyon Road corridor, as these student-related vehicle trips would be eliminated through the Analysis Report incorporation into the student busing program, or by the relocation of the existing student population from the Liberty Canyon site to the proposed new school location).* As previously stated, no trip credit should apply in this analysis since the existing school is located at a different site than the proposed Heschel school and trips would utilize different intersections to arrive to the proposed project. 28

27. Analysis of Interim School Impacts to Neighborhood Streets - Page 22 – second paragraph states that *the net impacts of the proposed interim Heschel School (with a student busing program and either the One-Way Loop or Mid-Block Access scenario) on the surrounding local/neighborhood streets would be well below the generally recognized thresholds for significance.* Information needs to be provided to support what is being referred to as "well below the generally recognized thresholds for significance." The City uses a specific set of criteria which have not been used here.

This section goes on to indicate that *implementation of the proposed interim student busing program would actually produce a net decrease in daily trips on some roadway segments in the project vicinity due to the elimination of the existing student trips.* This sentence refers to "existing student trips," however, as it has been stated before in this letter, the existing school is located at a completely different site, with different traffic patterns than the proposed Heschel school. 29

Additionally, this section states that *the proposed Carpool/Busing Plan would not be expected to produce any significant impacts to the local/neighborhood streets surrounding the project site and no mitigation measures would be warranted.* This information needs to be quantified in order to support this statement.

28. Analysis of Interim School Impacts to Neighborhood Streets – Page 23 – Table 4 – Local/Neighborhood Street Average Daily Traffic (Future (2010) Without and With Interim/Student/Student Busing Program) 30

Proposed Uses	Project Impact (One-Way Loop/Mid-Block Access)	Significance Threshold	Significant Impact
Chesebro Rd N/o Driver Avenue	11.5%/0.0%	12.0%	No

30

Table 4 indicates an *11.5% of project impact at Chesebro Road north of Driver Avenue,* however, the calculation presented in the table was done utilizing the formula:

*Project Trips/Future With Project * 100 (229/1999*100=11.5%).* The correct formula for this calculation should be Project Trips/Future Without Project *100 (229/1770*100=12.9%), therefore, the 12.9% represents an impact. This number will be higher when the trip reduction is corrected.

29. Analysis of Interim School Impacts to Neighborhood Streets - Page 24 – first paragraph states that *no significant impacts from this less intensive interim condition are anticipated, and no further CMP analyses are warranted.* The Supplemental Environmental Analysis needs to provide information regarding the CMP facilities/monitoring intersections that were looked at for the purpose of the Supplemental Environmental Analysis. They need to be listed and the number of project trips at these CMP facilities need to be identified. 31

30. Analysis of Future (2010) Cumulative Impacts – Page 24 – second paragraph. This section mentions *the analysis of cumulative impacts* but cumulative projects are not included in "ambient growth." The Supplemental Environmental Analysis needs to be revised accordingly. 32

31. Analysis of Future (2010) Cumulative Impacts – Page 24 – third paragraph states that *additional traffic would also be anticipated from a number of specific new developments within the study area that are either proposed, approved but not yet under development, or are currently under construction.* More information is needed in this section to support this analysis. Cumulative projects are not presented. 33

32. Analysis of Vehicle Trip Monitoring Program – Page 25 – fifth paragraph. This section indicates *that if a Tier Two Count reveals non-compliance with the maximum allowable peak-hour or daily vehicle trips, the School will be subject to a fine of $100 for each vehicle trip that exceed a maximum allowable peak-hour or daily trip limit. The School will continue to be subject to semi-monthly Tier Two Counts and applicable fines unless and until the School demonstrates compliance with the maximum allowable peak-hour or daily vehicle trips.* More information is required to support the basis for the $100 amount and the Supplemental Environmental Analysis needs to clarify if it is $100 per trip per day or $800 per peak hour. 34

33. Analysis of Future (2010) Cumulative Impacts – Page 26 – first paragraph. This paragraph mentions that *the fines would be used only for traffic or pedestrian enhancements on public road right of ways within a 0.5 mile radius of the project boundary.* The basis for 0.5 miles radius criteria need to be stated. This paragraph goes on to state that said fines shall be in addition to other fines or fees assessed through other code enforcement provisions either in this permit or other County codes. The Supplemental Environmental Analysis needs to be more specific regarding "the other fines." This section is not clear. 35

34. Analysis of Future (2010) Cumulative Impacts – Page 26 – second paragraph. In this paragraph, the following formula is provided: *the number by which student enrollment is to be reduced = (the average number of one-way, daily trips exceeding the number of allowed daily trips) * 2.5 students/vehicle (which is the average number of students per vehicle).* The result that there is no compliance would indicate that the initial carpool factor assumption is either incorrect or too high. The reduction in the enrollment should not be based upon the incorrect assumption but rather a revised carpool assumption. 36

APPENDIX

The following paragraphs are a review and comments of the Traffic Impact Analysis section of the Supplemental Environmental Analysis completed by Impact Sciences, Inc.: 37

35. Page 9 – second paragraph: *It is stated in this paragraph that a detailed review of the operations of this intersection, revealed that the critical component requiring access control was the "outbound" traffic from Canwood Street; the "twin*

approach" configuration of Canwood Street and the US-101 Northbound Off-Ramp on the east side of Palo Comado Canyon Road necessitates separating the westbound traffic flows on each of these approaches in order to avoid conflicting movements occurring at the same time. These movements, like any other movement pair, will not be conflicting with proper signal phasing sequence. 37

36. Page 11 – first paragraph: In this paragraph it is mentioned that *although the access scheme results in a slight modification of the School traffic distributions at two of the study intersections (Driver Avenue/Palo Comado Canyon Road at Canwood Street/Chesebro Road, and Dorothy Drive at the US-101 Southbound Freeway Ramps) as compared to the original study, the overall travel patterns for School traffic adhere to those identified in the approved traffic impact analyses, and do not present a significant departure from those assumptions.* More information is needed to support how this one-way loop configuration will impact the Driver/Palo Comado Road intersection. The Supplemental Environmental Analysis provides insufficient information to support the one-way loop configuration option. 38

37. Page 12 – third paragraph: This paragraph states that *in order to provide a detailed evaluation of all potential interim School traffic impacts, additional traffic data was collected at each of the five study intersections to supplement the data contained in the original project traffic study during the "post-AM peak hour (8:45 to 9:45AM), the pre-PM School peak hour (1:30 to 2:30 PM), and the pre-PM peak hour (3:00 to 4:00 PM) periods.* The Supplemental Environmental Analysis fails to provide a date for when these counts were collected and should be revised to provide such information. 39

38. Page 15 – second paragraph: In this paragraph it is stated that *"no buses were assumed to be stored at the school during the day".* This analysis should indicate that buses should leave (after student drop off during AM) and enter (for student pick during school PM) the site during the AM off-peak and PM off-peak periods. Therefore, the number of buses entering the school should be equal to the number of buses exiting at both peak periods. 40

In this same page and paragraph, it is mentioned that "[a]dditionally, it was assumed that the busing program would utilize . . . a "pce" value of 1.5". This assumption is not consistent with standards of practice. The Supplemental Environmental Analysis should utilize the correct "pce" based on nationally approved guidelines and/or

reference the basis to support the "pce" used in this Supplemental Environmental Analysis.

39. Page 36 – Table 2: This table presents a *Critical Movement Analysis Summary of the Existing (2003/2007) Conditions. The table indicates that the Post-AM and Pre-PM School analysis was done based in full or in part on new 2007 traffic counts performed for this study.* The AM peak hour and PM peak hour analysis should also be completed utilizing the new counts collected. Typically, new counts collected are during the 7-9 AM and 4-6 PM peak period. 40

40. Page 50 – Last paragraph: This paragraph states that "[t]he trip monitoring program details have yet to be refined." How is the County, or anyone else, able to determine whether the trip monitoring program is effective in mitigating traffic impacts of the Project if the very details of such a program have yet to determined? The failure to finalize the trip monitoring program details improperly defers mitigation in violation of CEQA. 41

41. The May 14, 2007 letter, regarding the loop road access, states that the County agrees with the Carpool/Busing Plan "that the cumulative traffic generated by the proposed interim project and other proposed projects in the area will result in a significant impact at the following City of Agoura Hills intersections. The project shall be responsible for paying its pro rata share of the following mitigation measures to the City of Agoura Hills prior to issuance of building permits for Phase I." (The letter goes on to list these measures). These statements are not clear. It appears that they indicate that there would be significant cumulative impacts from the interim project, but then that the pro rata share of the improvements must be paid prior to Phase I, not before the interim project is implemented. The conclusion of significant impact conflicts with that found in the text of the Supplemental Environmental Analysis. The document text and Appendix need to be reconciled. Also, the discussion of the measures regarding pro rata share needs to be reconciled with Comments 9-15 above. 42

42. The March 2007 Traffic Impact Analysis Report (Appendix B) for the one way loop road access indicates on page 97 that while no project-specific traffic impacts are anticipated, "the School may restripe the southbound approach of Palo Comado Canyon Road at the School's Canwood Street access location to provide a new exclusive left-turn pocket." If this is indeed part of the project, it should be described and analyzed in the text of the Supplemental Environmental Analysis. In 43

sum, additional information must be provided in order to analyze the effectiveness of this restriping option. 43

43. The June 2007 Traffic Impact Analysis Report for the mid-block access plan (Appendix B) indicates starting on page 48 that two roadway improvements would be conducted, even though no project-specific traffic impacts are anticipated. The goal is to "provide sufficient access capacity to and from the project site at the new Palo Comado Canyon Road driveway location, as well as enhance local travel and overall traffic flows in and through the project vicinity." These include widening the south/west side of Palo Comado between Canwood/Chesebro and the NB US-101 Freeway on-ramp to complete a 32-foot half roadway and widen the north side of Palo Comado from Canwood to the proposed Heschel School driveway to a 32-foot half roadway. "These additional roadway widths will accommodate the installation of an exclusive northbound right-turn only lane at the proposed project driveway location, in addition to the existing through lane, as well as the installation of a new southbound left-turn lane on Palo Comado at the site driveway, in addition to the existing through lane." The other improvement is the installation of a new two-phase traffic signal at this location, operated on an actuated basis. If these items are indeed part of the project, they should be provided in the project description and analyzed in the text of the Supplemental Environmental Analysis. In sum, additional information must be provided in order to analyze the effectiveness of these improvements. 44

44. Generally, the traffic discussion in the Supplemental Environmental Analysis and in the Appendices (both the Traffic Impact Analyses and the letters from Mr. Winter of the County) are internally inconsistent and also inconsistent with one another. Both elements conclude that the interim project would not result in significant traffic impacts in some areas, and then imply that cumulative impacts would be significant. Then, the Traffic Impact Analyses identify fairly substantial traffic improvements that would be necessary on City streets, but the reader is told that these measures are not really needed from a safety or efficiency standpoint. If not, why are they proposed? Similarly, these apparent needed measures are not mentioned anywhere in the text of the Supplemental Environmental Analysis, and not analyzed for potential impacts per CEQA. In conclusion, the project description of the interim school project is unclear, and therefore adequate environmental analysis per CEQA cannot be provided at this time. 45

CONCLUSION

The above comments demonstrate the extent of flaws and inconsistencies in the Supplemental Environmental Analysis, and the resistance to the proper application of CEQA. The content of this Supplemental Environmental Analysis, which is ultimately the product of the County of Los Angeles staff, must also be acceptable to the City, because the City will be requested to act as a responsible agency under CEQA. The Supplemental Environmental Analysis's approach to the project must be objective, with the County acting as the independent reviewing body.

The public review period for this document ends on November 14, 2007. The County Board of Supervisors' hearing is scheduled for November 27, 2007. However, given the fundamental flaws in the document that we received to review, combined with the vast extent of our comments, we believe that this document must be thoroughly revised to address all of our comments and to be considered adequate under CEQA. The document should then be re-circulated for another 45 days for review and comments. As such, we request that the hearing date should be rescheduled for some time in 2008. 46

We appreciate the opportunity to comment on the Supplemental Environmental Analysis and look forward to reviewing your responses to our comments. Please contact me if you have any additional questions.

Very truly yours,

Craig Steele

Craig A. Steele
City Attorney
City of Agoura Hills

cc: Mayor and City Council of the City of Agoura Hills
Greg Ramirez, City Manager
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TOTAL P.21

Richards Watson Gershon

Letter Dated November 14, 2007

Response 1

The responses provided herein conform with the standards of CEQA, including sections 15002 and 15088 of Title 14 of the California Code of Regulations (*CEQA Guidelines*). The County Of Los Angeles (the County) and Project Applicant have provided substantial evidence, i.e., sufficient factual information and basis for reasonable inferences to support the conclusions contained within the SEA. *Cal. Pub. Res. Code* Section 21080. In addition to the analysis made in the SEA responses, numerous other environmental analyses were performed in support of this Project to date and have been incorporated by reference SEA herein, including: (1) the Draft Environmental Impact Report (October 2002); (2) the Revised Draft Environmental Impact Report (March 2005); (3) Final Environmental Impact Report (June 2006); (4) Findings Of Fact Regarding the Final Environmental Impact Report (June 2006); (5) Traffic Impact Analysis Report on Proposed Interim School Student Carpooling/Busing Plan (March 2007); and the Traffic Impact Analysis Report on Proposed Palo Comado Canyon Road Mid-Block Access And Interim 390 Student School Occupancy Plan.

Response 2

The SEASEA is a focused analysis of the Interim School Project, which is an early phase of the ultimate School build-out, capped at 390 students. The Interim School Project includes the development of either the Mid-Block Access or a one-way loop for site access. These access improvements are a component of, rather than a mitigation measure for, the Interim School Project and are included in the Carpooling/Busing Plan. Each of these access alternatives has been determined to be a viable option for meeting the daily vehicle trip limits outlined in Table 1 of the Traffic Impact Analysis. These daily vehicle trip limits take into account a margin of error to account for aberrations in daily trip patterns. Further, as outlined and described in the Project Description and in further detail is **Section 2.4** of the SEA, compliance with trip limits will be rigorously monitored and enforced as described in **Section 2.4** of the SEA. The Carpooling/Busing Plan itself is a measure to further reduce the number of trips and to ensure that no significant traffic impacts occur as a result of the Interim School Project, and require no additional mitigations for its implementation.

Response 3

The proposed Interim School Student Carpool/Busing Plan has been designed to avoid significant traffic impacts at the intersection of Canwood Street, Palo Comado Canyon, and the freeway on/off ramps. Therefore, the installation of either a signalized intersection or roundabout as mitigation at this intersection is not required prior to implementation of the interim school.

The option of providing either the signal or roundabout has not been "dismissed." Rather, *one* of these improvements must be implemented before *future* phases of the project may be developed. The nature and efficacy of these measures were addressed in the Revised Draft EIR, and the implementation of these measures will be fully enforceable through permit conditions. Therefore, there has been no improper "deferral" of mitigation.

Response 4

Refer to **Section 2.0, Project Description**, for information on the Interim School Project. Refer to Response to Comments 5 through 47 for written responses to specific topical issues raised in this comment

Response 5

Consistent with the Board's request and requirements of CEQA, the SEA focused on the direct physical changes of the interim plan on the environment. The analysis for buildout of the school as described in CUP No. 98-062 is fully evaluated in the Revised Draft EIR. The modifications evaluated in the SEA are described in **Section 2.0** herein, and included a reduction in the height of the manufactured slope (59 feet to 47 feet), area (2.38 acres to 1.80 acres), and grading volume (63,944 cubic yards to 40,302 cubic yards). Therefore, the focus of the SEA was to determine whether the proposed interim plan would cause any new impacts not previously disclosed nor increase the severity of an existing impact identified in the Revised Draft EIR.

Response 6

The revised grading scheme for the Canwood access driveway (Exhibit C-1 of the Supplemental Environmental Analysis) shows a reduced aesthetic impact compared to the project access described in the Revised Draft EIR. The manufactured slope has been reduced in height (59 feet to 47 feet), area (2.38 acres to 1.80 acres) and grading volume (63,944 cubic yards to 40,302 cubic yards). The photometric analysis in the Revised Draft EIR (Refer to **Figure 4.1-5**) shows a representative depiction of visual impact

of the entrance road grading from the original grading concept. The revised grading plan would have a somewhat reduced impact as documented in the SEA.

The mid-block access, initially reviewed in the Alternative 5 analysis of the Revised Draft EIR, was refined in the ESA with a detailed entrance driveway grading concept. This grading concept (Appendix C-2) provides full disclosure as to the extent and character of the aesthetic impact of this alternative access. Furthermore, aesthetic impacts would clearly be less than those of the buildout condition given the reductions in slope height, grading volume, and disturbance area. Implementation of this alternative would require a permit from the City of Agoura Hills; therefore, this access is subject to the City's review and approval.

No other Project grading modifications are proposed as part of this supplemental review.

Response 7

The "shelter in place" protocols apply to all phases of the Project including the "interim" school project. The initial school construction will include a shelter-in-place permanent building. The initial shelter-in-place facility location can be seen on **Figures 2.0-5** and **2.0-7** of the Revised Draft EIR Volume I. This location remains unchanged with the Interim School.

During an emergency, the driveway to Chesebro Canyon Road would not be used to evacuate the school. In an emergency, the one-way loop traffic pattern of the Interim School would not be used. Egress from the school would be through Canwood Street directly to the freeway. Therefore, the school would have no affect on Chesebro Canyon Road during an emergency. It is anticipated that the School's driveway at Chesebro would be used as an alternate evacuation route for Chesebro Canyon residents seeking a direct, uncongested, route to the freeway. These evacuation procedures, along with emergency protocols will be outlined in the School's Emergency Response Plan, as required by the County.

Response 8

The modified grading plan was publically available at all times while comments were being solicited. Moreover, a reproducible and high-resolution copy of the grading plan was distributed to the City of Agoura Hills in electronic format. The modified grading would result in the disturbance of less earth as discussed in **Section 4.6** of the Revised Draft EIR and thus has been adequately studied under the prior environmental impact analysis.

The City of Agoura Hills is a responsible agency for the Project and to the extent the proposed grading, berms, drains and retaining walls would come under the City's jurisdiction, the County and Project Applicant would coordinate with the City to secure necessary approvals.

The County Department of Public Works has found the access road and retaining wall to be technically feasible.

Please also refer to the response to comment #6 herein.

Response 9

The purpose of the term traffic circle is simply to provide a colloquial reference for the reader regarding the general characteristics of a roundabout, since that term may be foreign, and the term "traffic circle" is a more common description. The language in the SEA is not intended to mean these two traffic control options as the same. The proposed improvement is a roundabout.

Response 10

The measures listed in subsection 2.1 are a reiteration of the mitigation measures required of the original 750-student school, as identified in the Revised Draft EIR. The analysis therein fully compares project impacts against thresholds of significance and makes a determination on the effectiveness of these measures in **Section 4.2** of that document.

Response 11

The intersections included in the traffic study and SEA are the same ones selected by the County Department of Public Works Traffic and Lighting Division prior to the preparation of the Revised Draft EIR; based on the original project trip generation and traffic patterns, these locations were identified as those most likely to be impacted by the proposed school project.

The differences in project traffic distributions between the original project and the two access alternatives (one-way loop, midblock access) are fully described and explained on page 8 and in Figure 4 (page 10) of both the Revised March 2007 Interim School and June 2007 Interim School Mid-Block Access traffic studies, attached to the SEA as Exhbits A and B, respectively.

Response 12

The basic purposes of CEQA include the identification of ways which environmental damage can be avoided and the prevention of significant, avoidable damage to the environment by requiring changes in

projects through the use of alternatives or mitigation measures. See *CEQA Guidelines* Section 15002(a)(2-3). It is correct that the Project modifications have been proposed in order to limit the Project's potential environmental impacts. The County would point out however, that developing or phasing the Project in a manner that decreases or avoids significant environmental impacts is not only appropriate but is the primary goal of CEQA. The Project's phasing modifications also respond to the City's strong concern over some of the permanent traffic mitigations and whether they are compatible with the surrounding neighborhood.

Mitigation measures are only required in response to significant environmental impacts. Through variations in the Project's phasing and appropriate mitigation, environmental impacts resulting from the Project have been reduced below a level of significance. The applicant will implement all applicable mitigation measures associated with the Interim School Plan on schedule and no mitigation measures would be improperly deferred.

Response 13a

In the context of discussing the Interim School Carpool/Bussing Program, the "drive alone" faculty statement in the SEA was to differentiate faculty trips from any other specific carpool or bussing trip. Faculty and staff members were not assumed (or required) to participate in any such programs. The assumption of 1.2 Average Vehicle Occupancy (AVO) for faculty/staff is consistent with the SCAG vehicle occupancy averages for the region, and represents a conservative estimate of vehicle occupancies for typical non-carpool or high-occupancy vehicle trips (essentially, the 1.2 AVO means for every 10 faculty/staff vehicles, a total of 12 persons are delivered).

Response 13b

A 20 percent drop-off factor means that, in addition to "inbound" faculty trips, there is also an "outbound" faculty trip component equal to 20 percent of the total inbound faculty trips), both of which contribute toward the identified School trip caps.

Total # of Trips = # of Inbound Trips + (# of Inbound Trips x Drop-off Factor) + Outbound Trips

The assumption of a 20 percent "drop off" component for faculty is again a conservative for purposes of the traffic impact analyses for the Interim School project alternatives, and is based on the location of the proposed school in relation to the potential faculty/staff residences and the Ventura Freeway, as detailed on page 14 of the Interim School traffic study. If a smaller or zero percentage were assumed, the number of School trips would be fewer than assumed in the SEA, since the number of faculty/staff outbound

trips would decrease, reducing the total number of School trips, and presenting a less conservative analysis assumption than is included in the SEA.

Response 14

Based on comparisons with other school monitoring programs, which generally require trip cap monitoring only during the beginning of a school term, the requirement for monthly trip monitoring is aggressive. Additionally, the County or their selected agent will be responsible for collecting the monitoring data. The School is unlikely to ignore the trip cap requirements as the monitoring visits will be unannounced and the School will be penalized if caught. As such, there is no incentive for the School to ignore the trip cap requirements. See the project description contained in **Section 2.0** for specifics of the carpool/busing program and associated trip cap monitoring program.

Response 15

As acknowledged in the SEA, the project will add incrementally to future vehicle delays in the area's (unsignalized) intersections, although such incremental delays are less than significant; and any such additional delays do not warrant installation of traffic signals.

Since no significant traffic impacts will occur under the Interim School project, no mitigation is necessary. Traffic impacts and mitigation requirements for the full (750-student) project are identified and analyzed in the Revised Draft EIR; alternative "signalized" and "non-signalized" mitigation measures are provided in Revised Draft EIR for project buildout.

Response 16

Please refer to Table 5, page 69 of the Interim School traffic study, **Appendix A** hereto, and Table 4, page 44 of the Interim School, Mid-Block Access, **Appendix B** hereto, traffic study for the results of the analysis of cumulative impacts. The analysis concluded that cumulative traffic volumes would result in the deterioration of operating conditions at the study intersections. Mitigation was identified in the Revised Draft EIR for addressing these potential cumulative impacts.

Response 17

Refer to **Section 2.0** of the Final SEA for a description of the Interim School Plan. The specific provisions of the Interim School Project, including the monitoring and enforcement obligations, will be enforced through permit conditions. Non-compliance with the program will result in financial penalties that provide incentive for the School to comply.

Response 18

The analyses and description of the Interim School Mid-Block access scenario in the SEA indicate that the traffic signal at the mid-block access location is integral to the installation of the new access point, and therefore is not a mitigation measure.

Response 19

The road as currently designed supports bus traffic coming to and from the Santa Monica Mountains Park and large trucks towing horse-trailers and other recreational users. The County has concurred that the design is sufficient to accommodate school buses.

Response 20

This comment fails to specify which assumptions are problematic or inconsistent with standard industry practice. The carpool/bussing program proposed under the Interim School Project is designed to reflect the circumstances and operational characteristics of the proposed use rather than a generic standard of practice. The intent of the carpool/bussing program is to be flexible, so as to accommodate ever-changing student residence locations, changes in the roadway network, and other factors. As such, smaller student populations can be adequately served through the provision of smaller buses or changes to the pick-up/drop-off routes of larger buses. It should be noted that the trip cap levels identified in the SEA are based on the maximum interim enrollment level of 390 students. Smaller initial enrollment levels would generate fewer trips, and therefore, the average vehicle occupancies could be lower and still be within the allowable limits.

Response 21

Refer to Response No. 13a and 13b.

Response 22

The statement was to note that the SEA analyses utilized the same "Future (2010) Without Project" baseline traffic conditions to evaluate the operations of the Interim School alternatives as was used in the analysis of the full (750-student) enrollment school. Please note the existing school does not utilize a carpool or bussing program.

Response 23

The traffic studies conducted as part of the SEA, and the Revised Draft EIR itself, acknowledge that the existing Liberty Canyon school site has different trip distributions from the proposed project. However, the trip distributions for the full-enrollment school project, as well as the Interim School alternatives, were derived based on the residence locations of the Liberty Canyon school students. These residence locations indicate that some of these existing school site students reside in portions of the City of Agoura Hills west of the school, and would utilize travel paths to and from the Liberty Canyon School that pass through some of the study intersections. As such, the removal of these trips is appropriate. The existing Liberty Canyon School traffic and trip distributions are described in detail in Appendix A of both the Interim School and Mid-Block Access traffic studies prepared for the SEA.

Response 24

Data was not available for the off-peak hours. Where data was available, it was used in order to provide a more detailed assessment. The use of this data where available resulted in a more conservative analysis for the off-peak hours.

Response 25

The bussing and carpool programs are an integral part of the Interim School Project and there is no reason for the SEA to analyze an Interim School Scenario without such a program. Also, CEQA does not mandate analysis of plans or theoretical project components not proposed as part of the Project or for "comparison purposes."

Response 26

As explained in the response to comment #24, where data was available, it was incorporated into the SEA, which generally, resulted in a more conservative analysis.

Response 27

It is unclear the real issue associated with this part of the comment unclear. Nevertheless, the "peak hour" whether AM or PM, is defined as the highest four consecutive 15-minute periods (60 minutes total) occurring within the larger (2 or 3-hour) "peak period". All peak hour analyses contained in the Revised Draft EIR and SEA consisted of 60 minutes, not 120 minutes.

Response 28

Refer to Response No. 23.

Response 29

Refer to Table 4 of the Traffic Study found in **Appendix A** of the SEA for the analysis of local neighborhood impacts. Also refer to Response 23.

Response 30

The methodology used to calculate the project's impacts to residential streets is consistent with the requirements of the County Department of Public Works. The impact formulas in the SEA are correct, in that the significance of an impact is based on the project's percentage of total future trips (including project traffic), not the percentage increase from without project trips, as calculated by the methodology suggested by the City.

Response 31

The names and locations of the CMP intersections in the project vicinity are described and shown in **Section 4.2** of the Revised Draft EIR. The Revised Draft EIR identified that the full enrollment project would not significantly impact any of these locations; since the Interim School projects produce fewer trips than the original project, their impacts at the CMP locations would be less than what is described in the Revised Draft EIR and, therefore, would also be less than significant. No additional analysis is therefore required.

Response 32

Refer to **Section 4.0, Cumulative Impact Methodology**, of the Revised Draft EIR for a list of cumulative projects utilized in the analysis. Also refer to Response 22.

Response 33

Refer to **Section 4.0, Cumulative Impact Methodology**, of the Revised Draft EIR for a list of cumulative projects utilized in the analysis.

Response 34

The County determined an enforcement mechanism which established a $100.00 fine for each vehicle trip that exceeded a maximum allowable peak hour or daily trip limit. This was a reasonable amount determined by the County to cover the cost of enforcement.

Response 35

The 0.5-mile radius criterion is a proximate distance established by the County to link the project's possible impacts with enhancements and fines. Such determinations are based on common practice and are reasonable and permitted under CEQA.

Response 36

The Interim School Student Carpool/Busing Plan is a specific program with specific goals. Trip calculations are based upon this specifically tailored program rather than on industry standards of questionable applicability to the facts and circumstances at hand. Please also refer to the response to comment # 20.

Response 37

The Interim School Project was designed such that enrollment is capped prior to installation of permanent traffic mitigation improvements as required by Caltrans, allowing the School to start its operation prior to ultimate build out. The mitigation measures outlined in the SEA are adequate to address the impacts of the Interim School Project.

Response 38

Refer to Response No. 11

Response 39

Refer to Appendix G of the Traffic Study contained in **Appendix A** of the SEA.

Response 40

Regarding student pick-up and drop-off by buses refer to Table 1 in the Traffic Study found in **Appendix A** of the SEA.

The use of 1.5 passenger car equivalents (pce) to account for bus trips is an accepted engineering convention. Further, the County's Department of Public Works, Traffic and Lighting Division, approved the two Traffic Impact Analyses.

Lastly, data was already available for peak traffic trips from 7 - 9 AM and for 4 - 6 PM and was therefore utilized. Data for "off-peak" post-AM and Pre-PM hours was not available and was therefore collected for this analysis. The use of available existing data in traffic analyses is accepted practice.

Response 41

Substantial information concerning the proposed monitoring program has been provided in the SEA, and the efficacy of the program has been evaluated. Although certain details of the trip monitoring program may be refined, the program does not constitute improper deferral of mitigation because (1) the program includes specified performance standards that will mitigate the potential traffic impacts of the interim school to a level of insignificance; (2) the program evidences a commitment to meet these performance standards; and (3) there is a monitoring program in place to ensure compliance along with correction mechanisms.

Response 42

As defined in **Section 3.0** of the Revised Draft EIR, Phase I of the Interim School Project is to include 350 to 390 students. Accordingly, the capacity of students of the Interim School Project has been studied within the scope of Phase I. The pro-rata share of the mitigation measures described in the May 14, 2007 letter must be paid before the issuance of building permits for the Interim School Project.

Response 43

The purpose of striping a left turn pocket on the southbound approach of Palo Comado at Canwood is to channel vehicles to a defined space while waiting for the opportunity to make a left turn. This left turn pocket does not change the operational characteristics of the intersection, as southbound traffic has adequate roadway width to pass stopped vehicles that are turning left. Therefore, the striping of a left turn pocket is not mitigation for project impacts.

Response 44

The measures described (Palo Comado widening to accommodate southbound left-turn and northbound right-turn lanes at mid-block access, plus the installation of a traffic signal at the mid-block drive) are all included as part of the installation of the mid-block access, and are therefore not "mitigation." The effects of these improvements are included in the analysis of the mid-block access intersection.

Response 45

The analyses contained in the SEA conclude that there are no project-specific significant impacts, but acknowledge that significant cumulative impacts, of which the Interim School projects are a part, will occur. However, the cumulative impact mitigation measures are identified, described, and their effectiveness analyzed in **Section 4.0** of the Revised Draft EIR.

Response 46

No new significant information has been presented within the City of Agoura's letter or otherwise which would require revision and recirculation of the SEA for additional public comment. See Response to Comment 1 herein.

Letter No. 2

COUNTY OF LOS ANGELES

DEPARTMENT OF PARKS AND RECREATION

"Creating Community Through People, Parks and Programs"

Russ Guiney, Director

November 14, 2007

TO: Hsiao-Ching Chen
Department of Regional Planning

FROM: Bryan Moscardini
Department Parks and Recreation-Planning Division

SUBJECT: **NOTICE OF COMPLETION AND AVAILABILITY-ADDITIONAL INFORMATION OF PROPOSED INTERIM SCHOOL STUDENT CARPOOL/BUSING PLAN FOR THE HESCHEL SCHOOL PROJECT.**

The Department of Parks and Recreation has reviewed the above Notice. The additional proposed Interim School Student Carpool / Busing Plan will not affect facilities under jurisdiction of this Department. 1

If you have any questions, please contact me at (213) 351-5133.

BM(c:response-Heschel School busing plan)

c: Parks and Recreation (James Barber, Patrick Reynolds, Joan Rupert)

Planning and Development Agency • 510 Vermont Ave • Los Angeles, CA 90020 • (213) 351-5198

County of Los Angeles Department of Parks and Recreation

Letter Dated November 14, 2007

Response 1

This comment does not question the content or adequacy of the SEA. No further response is required.

Letter No. 3

BS

Old Agoura Homeowners Association
6064 Chesebro Road
Agoura Hills, California 91301

November 14, 2007

Supervisor Zev Yaroslavsky
Supervisor Michael D. Antonovich
Supervisor Gloria Molina
Supervisor Yvonne Burke
Supervisor Don Knabe
500 W. Temple Street
Los Angeles, California 90012

Re: County Project No. 98-062

Dear Supervisors:

The Old Agoura Homeowners Association ("OAHA") hereby responds to the applicant's recently submitted Supplemental Environmental Analysis of Proposed Interim School Student Carpool/Busing Plan ("Supplemental Analysis") which was presented to the Board of Supervisors in September, 2007, and which will be the topic of a hearing scheduled for November 27, 2007. By way of response, the OAHA does state:

I.

INTRODUCTION

In 1998, the applicant first approached the County of Los Angeles ("County") to secure a conditional use permit ("CUP") to build a private school on land it purchased well below market value in that the land was 1

deemed unfit for development. After nearly a decade, the applicant has been unable to submit a plan that comports with either the land or the laws governing development of the land. In what may be termed as its most recent act of hubris, the applicant has now submitted to the County the Supplemental Analysis you ordered it to provide, yet it ignores much of what you required it to submit in the motion carried at the last hearing on this matter on January 23, 2007. OAHA hereby requests that the Board of Supervisors require the applicant to follow its orders, and to submit an analysis which comprehensively and objectively answers all of the issues raised in the County's motion. Further, OAHA hereby requests that the issues it raised in its appeal to the Board of Supervisors be heard and answered, as required by law. 1

II.

THE APPLICANT HAS FAILED TO COMPLY WITH THE BOARD OF SUPERVISORS' ORDER TO SUBMIT REVISED PLANS

On January 23, 2007, Supervisor Yaroslavsky made a motion which was passed by the Board. The Motion set forth a compromise interim plan for the school and required the applicant to: 2

1. Develop an interim traffic plan;
2. Perform any and all additional environmental assessments pursuant to CEQA, and direct staff to prepare appropriate responses to comments in the final environmental documentation;
3. Prepare a modified grading concept that meets all county standards

4. Produce photometric and sight line analyses, elevations, building renderings and landscape plans, and prepare a modified set of design and landscape standards;
5. Create a preliminary emergency response planning checklist for inclusion as a condition for the permit that will establish clear lines of communication between parents, school officials, community members and emergency responders and ensure that the school does not interfere with an orderly evacuation of the surrounding community;
6. Improve the school's noise attenuation plan'
7. Work with the City to develop a set of standard minimum conditions for any temporary use permits approved for the site; 2
8. Secure final documentation verifying the appropriate conservation and public park agency's willingness to receive the deed restricted conservation easement and land dedication and submit this documentation to the Board; and
9. Repair and maintain all exterior fencing on the property.

The Supplemental Analysis submitted by the applicant deals only with the development of a student carpool/busing plan, and does not even completely perform this task in that it fails to perform any and all additional environmental assessment required by CEQA. The applicant provides a cursory look at a modified grading concept, but simply provides a graphic which may or may not be an accurate rendering of the necessary grading.

The applicant has completely failed to produce a photometric and sight line analysis, and indeed, has *never* provided one for any of its various design plans which allows a view from the homes adjacent to the property along Chesebro Road. Nor has the applicant prepared a modified set of design and landscape standards to preserve the semi rural equestrian character and existing architectural aesthetic of Old Agoura.

The applicant has not created a preliminary emergency response planning checklist for inclusion in the conditions of the CUP;

The applicant has failed to document that it has improved the school's noise attenuation plan.

The applicant has failed to work with the City to develop standard minimum conditions for any temporary use permits approved for the site. 2

The applicant has failed to submit the documentation that it has indeed located and secured an appropriate conservation and/or public park agency willing to receive a deed restricted conservation easement, as required by one of the conditions of the CUP.

OAHA can only presume that at the upcoming hearing, the Board will direct the applicant to comply with its prior order and return at such time it is prepared to address all the concerns set forth in the Board's motion. A cohesive and comprehensive look at the proposed project is necessary particularly in this case because so much of the substance of the Board's motion overlaps. For example, one cannot appropriately examine or consider the applicant's present Supplemental Analysis of its proposed carpool/busing plan without knowledge of its proposed photometric and sight line analysis; its preliminary emergency response planning; its

proposed noise attenuation plan; and its proposed standard minimum conditions for any temporary use permits. Under these circumstances, any action taken by the Board which grants or denies, approves or disapproves, or in any way affects the direction of this project will be an action which is taken beyond the legitimate discretion of the Board. 2

A. The Applicant Has Failed to Submit a Revised Environmental Impact Report

The Supplemental Analysis parades as a document which complies with CEQA and the Board's order when in fact it does not. The Board's Motion required much more than the applicant's Supplemental Analysis indicates . The applicant summarizes the Board's motion as limited to requiring it to develop a plan to construct a temporary campus for 390 students with an interim traffic plan that fully mitigates all project-specific, tertiary, and cumulative traffic impacts, provides an enhanced, measurable and enforceable busing and/or carpooling program and includes an evaluation of alternative access routes. As set forth herein, the Board's order created a much broader obligation for the applicant to fulfill, which also constituted a substantial change in the circumstances under which the project is being undertaken. This substantial change – from a permanent campus to serve 750 students to a temporary campus to serve 390 students – requires major revisions in the environmental impact report. In this situation CEQA mandates a revised environmental impact report to address the changed circumstances of an interim project. Cal. Pub. Res. Code section 21166. The applicant has not submitted one, and the County, the City and 3

the residents have no idea what the impacts specific to the revised school plan might be, or how they may be mitigated, or indeed, if mitigation is possible at all. 3

By way of example, the revised school plan requires significant grading to create an access road which has not been formally analyzed in any document created pursuant to CEQA. The applicant expects that all interested parties can glean what information they have deigned to include in the Supplemental Analysis as the only information to be provided regarding this issue: "this Supplemental Analysis also provides an opportunity for public review and comment on the School's most recent plans for grading in connection with the creation of a campus access roadway in one of two locations." The applicant provides "graphical depictions" of its refined grading plans, but fails to provide any analysis which satisfies CEQA. It would appear to any casual observer that CEQA requires an analysis a little bit more specific than the mere "graphical depictions" the applicant now wishes to submit. Otherwise, the applicant's artful renderings of its school presented over the years would have been sufficient to satisfy its legal obligations. It is to state the obvious to assert that CEQA requires an analysis greater than "graphical depictions" for a massive grading project. Moreover, there is no indication or analysis that the newly proposed grading plan comports with the North Area Plan. 4

6

B. The Applicant Has Not Cooperated With the City of Agoura Hills

The applicant failed to cooperate with the City of Agoura Hills to insure that the project will not pose an undue burden on the City of Agoura Hills or its residents. While the City of Agoura Hills ("City") is in the best position to present this argument to the County, the fact is that OAHA, comprised of residents of the City, has a vested interest in ensuring that the cooperation the County has mandated actually occur. To the best of OAHA's knowledge, the applicant and the City have had little or no communication about the significant roadway improvements the project will require, or about the standard minimum conditions for any temporary use permits. Without assurance that the applicant will bear the costs its project will incur, the OAHA must oppose the project as now planned, for it will be the residents of the City who will have to subsidize the cost of a private school in their midst. Without assurance that the applicant and the City can come to terms regarding minimum conditions for temporary use permits, the project should not proceed. 4

On page 9 of the Supplemental Analysis the applicant describes its "fair share" contribution to the roadway improvements its project requires. What the Supplemental Analysis fails to specify is exactly what it deems to be its "fair share." This "fair share" language has been in the project plans from its first inception, and despite numerous requests, the applicant still balks at disclosing to the County or the City or indeed anyone who inquires what it deems to be its "fair share," or how such an amount would or could ever be calculated. The roadway improvements are a condition of the development and must be designed and constructed in order for the project 5

to be built. OAHA is unaware of any other private development in this County or in any county in California which has been permitted to rely on local municipal funds to comply with a condition precedent to construction. It would constitute nothing less than an unlawful use of public funds to require the City to subsidize the development of a private school. 5

III.

THE BOARD OF SUPERVISORS HAS NOT FOLLOWED ITS OWN PROCEDURES

Los Angeles County Code sections 22.60.240 and 22.60.250 set forth the procedures to be followed by the Board of Supervisors in the appeal now before it. The Board has failed to indicate in any way that it has considered the evidence presented to the Regional Planning Commission; and it has failed to consider or decide many of the issues presented on appeal by OAHA.

On January 23, 2007, the initial hearing on the instant appeal occurred. The Board severely curtailed the opportunity for OAHA and the City to present their arguments by limiting each speaker to three minutes. This limitation was imposed on all parties except for the applicant. OAHA's attorney, who had prepared a comprehensive argument covering substantive and procedural issues was cut off mid-thought after three minutes. OAHA has not had the opportunity to be heard in this appeal, and now requests that the Board reconsider its Motion and reopen the appeal process from the beginning. The failure of the Board to make any determination of the merits of OAHA's issues on appeal and its reluctance to even hear those issues 6

argued indicates at a minimum the Board has not fulfilled its obligations pursuant to the County Code to hear the appeal now before it. Instead, the Board directed a very specific and limited argument solely about how the school will operate until it can be completely built as envisioned. The matter was predetermined and the time limit placed upon OAHA was simply a veiled message that the Board did not have the time or the inclination to be bothered with arguments against the project. 6

A. Many of the Issues Presented by OAHA on Appeal Have Been Ignored

While Los Angeles County Code section 22.60.250 does not require the Board to limit its decision to the points appealed, the Board does not have the discretion to ignore issues on appeal altogether. The following issues presented in OAHA's appeal have yet to be examined, and the Board refused to allow sufficient time for these issues to be argued at the January 23, 207 hearing: 7

- The Regional Planning Commission failed to proceed in the manner required by CEQA, the CEQA Guidelines, the Santa Monica Mountains North Area Plan and implementing ordinances, including the applicable conditional use permit requirements.
- The EIR fails to provide an analysis of the visual impacts the project will have on the community during each phase of its development; 8
- The project objectives as stated in the EIR are overly specific rendering the proposed site the only viable alternative; 9
- The EIR fails to evaluate an alternative site made available to the 10

applicant within the same community, which site fulfills their stated objectives with no impact on an existing semi-rural community; 10

- The EIR fails to evaluate adequately the project's significant impacts on daily traffic, on traffic and safety during emergency situations; on the freeway mainline; on the freeway interchanges; including, but not limited to, the fact that no definitive access to the property exists; 11
- The EIR is further incomplete in that the traffic study relied upon projects traffic to the year 2010, and leaves unanswered the question of whether a traffic study including the year 2025 standards is indicated by the project or required by Caltrans;
- The EIR fails to evaluate whether the Palo Comado Canyon bridge over the freeway will require widening due to this project;
- The EIR fails to address in any meaningful way the significant health and safety dangers the project foists upon the existing residents in the event of an inevitable emergency in a Class 4 fire danger area;
- The EIR fails to determine how the inability to improve the rural infrastructure surrounding the proposed project can be mitigated to an acceptable level; 12
- The EIR fails to consider the dangers inherent to pedestrians, bicyclists and equestrians created by such a significant increase in traffic on narrow roads with no sidewalks;
- The EIR adopts the erroneous analysis in the revised draft EIR of the impacts related to hydrology and water quality;
- The EIR contains a faulty and incomplete analysis of Alternative 2;
- The EIR lacks any basis in fact to support the presumptions of school

10

growth used to reject Alternative 4.

B. The Project Fails to Comply with the North Area Plan

The Los Angeles County General Plan segment controlling development in the area of the proposed HESCHEL DAY SCHOOL WEST is THE SANTA MONICA MOUNTAINS NORTH AREA PLAN (NAP). The land use designation for the Heschel parcel in the NAP is Mountains Land 5, or N5. In the LAND USE CATEGORIES section of the NAP, this designation is designated as follows:

"MOUNTAINS LANDS: Lands designated as *Mountain Lands* within the NAP consist of those rolling hillside areas, steep slopes, and isolated remote mountain lands with difficult or no access. Mountain Lands also include areas served by winding mountain roads which cannot accommodate substantial increases in traffic from new development. The primary intended use is large lot single family estate housing. Other uses that may be found compatible, where consistent with the policies of this plan (such as—but not limited to—landform and resource protection, water runoff management, safety provisions and preservation of rural character) include agriculture, horse stables, retreats, monasteries, private camp grounds, bed-and-breakfast lodging. Low-intensity conference centers, public and private schools, water tanks, and telecommunications facilities and other local serving public facilities." 12

11

The above says that some non-residential uses may be permitted if they are consistent with the policies (this indicates all policies) of the NAP and are local serving. There was much discussion during the formation of the NAP land use policies about the need to avoid regional institutions in order to minimize additional traffic loads.

This comment will show that the proposed school is not consistent with the majority of the applicable goals and policies of the NAP, and is thus not entitled to a Conditional Use Permit to build at the location in question. Several citizens who have testified in opposition to the Heschel proposal were members of the three founding committees of the NAP for several years. Joan Yacovone, prior mayor of Agoura Hills was on the Policy Committee, Jess Thomas and Phil Ramuno were on the Public Advisory Committee and are members of the Old Agoura Homeowners Association, and Mike Kamino, Planning Director for Agoura Hills, was on the Technical Advisory Committee. These people know the intent of the NAP because they helped create it. One of the ironic intentions of the NAP was to prevent fiascos like Heschel's now ten-year-old development attempt by defining the intensity of uses permitted in the Santa Monica Mountains.

12

The following is a limited list of the goals and policies of the NAP which clearly show that the HESCHEL WEST DAY SCHOOL proposal is inconsistent with those goals and policies.

12

"FIRE HAZARDS GOALS AND POLICIES

Goal 9V-10: A built environment designed to minimize the potential for loss of life, physical injury, property damage, economic loss and social dislocation due to wildland fires.

Policy V-70: In fire-hazardous areas with significant biological resources, place a higher priority on avoiding development than on designing mitigation measures that would require intrusive fuel breaks and fuel modification areas to protect new development."

12

In Heschel's CUP requirements, the fire department has mandated huge areas of existing biological resources to be removed as a fuel modification fire break. This is because the school is proposed to be built in the most severely hazardous fire zone in the Santa Monica Mountains. Of the many local wild fires in recent history, two have burned through the entire area where Heschel proposed to build. Existing local residents have experienced the terror and chaos of evacuation. There has been no formal study of the effect of the Heschel School on the ability of local families to evacuate efficiently. Old Agoura has been completely frustrated by the lack of meaningful comment from the Los Angeles County agencies of Fire, Sheriff, and Public Works, despite our repeated attempts to identify responsibility.

13

The fires of October have created a whole new dimension to the prospect of fire hazard.

Clearly, the County system for dealing with the complexities of public safety during fire storms must be drastically augmented to match the unforeseen new conditions which continue to evolve. It is insane to even consider granting a CUP for this school at this location. That would be an invitation for tragedy.

"HILLSIDE MANAGEMENT GOALS AND POLICIES 12

Goal IV-3: Hillside areas that retain their natural topographic character and native vegetative communities, and hillside development which protects public health and safety and minimizes erosion and development-induced runoff.

Policies:
IV-20: New development projects shall be designed to protect significant natural features, and to minimize the amount of grading.

IV-23: Discourage the use of manufactured slopes in excess of ten vertical feet, and require that any such slopes be land-form graded.

14

IV-24: Ensure that the overall project design/layout of hillside developments adapts to the natural hillside topography and protects ridgelines and natural-appearing views from surrounding vantage points such as highways, parklands and overlooks. Overall emphasize fitting the project into its hillside setting rather than altering the hillside to fit the project."

The school's first design was based upon an almost thirty-foot high artificial plateau and is now down to about twenty feet, still double what the general plan calls a maximum. The proposed access road cuts a 90-foot deep slash in the ridgeline which protects the existing rural neighborhood from the river of noise and pollution generated by the adjacent 101 freeway. These design factors do not, in any way, make an attempt to adapt to the existing hillside topography. 12

"SCENIC HILLSIDE GOALS AND POLICIES

GOAL IV-5: An environment that retains the area's scenic beauty, including specific natural features and broad vistas.

Policies:

15

IV-38: Maintain and enhance the visual quality of vistas along the unincorporated portions of identified scenic routes, including:

- *Ventura freeway*
- *Mulholland highway*
- *Kanan-Dume Road*
- *Agoura Road*
- *Chesebro Road*
- *Cornell Road*
- *Las Virgenes Road*
- *Old Topanga Canyon Road*
- *Topanga Canyon Road*

IV-39: Regulate the alteration of the natural landscape and terrain to ensure minimal visual disruption of existing settings. 12

IV-40: Preserve in their natural state, topographic features of high scenic value, including significant canyon walls, geological formations, creeks, and waterfalls. Preserve the area's hillside backdrop in its present state to the extent feasible and control the design of development on ridgelines so that it will not interfere with significant scenic views.

IV-41: Ensure that any alteration of the natural landscape from earth-moving activity, as well as new development, blends with the existing terrain of the site and surroundings.

IV-43: Design and site buildings, including clustered development, so as to be compatible and harmonious with the surrounding environment. For

example, designs should incorporate mature stands of trees, rock outcropping, streams, lakes, and reservoirs and other such natural features."

Observe that Chesebro Road is one of the nine major scenic routes set out for protection in the North Area Plan. Heschel's plan calls for hiding the campus from the lower elevation views with landscaping. But that completely ignores that much of Old Agoura is much higher than Chesebro Road. The urban-density campus, with its attendant traffic clatter, will be in stark contrast with the natural open space and tranquility that the neighborhood now cherishes. The line-of-site declarations in the EIR completely ignore this jolting reality. Again, the cut in the southerly ridgeline is an absolute travesty. 12

The sole token effort in the school's plan to maintain a natural appearance in the artificially elevated building pad is to call for a very vaguely defined undulation in the sloping westerly face of the new wall next to the existing rural homes along Chesebro Road. There are absolutely no proposed physical features to soften the intrusion of the campus, outside of sketchily described landscaping, using saplings. This project doesn't blend in, it stands out, and up.

In the very beginning of the NAP, the **GUIDING PRINCIPLES** are stated as follows:

"The guiding principle of the Santa Monica Mountains North Area Plan is to: **'let the land dictate the type and intensity of use.'** The overall goal of the plan is to maximize preservation of the area's natural environment, recognize the opportunities and constraints that the land imposes, accommodate new uses that minimize impacts on the natural environment, and ensure that new development is compatible with and enhances the quality of existing communities."

Next are the **GENERAL GOALS** of the plan.

"GOAL I: ***Preservation of the unique cultural qualities and characteristics of rural and suburban areas.***

12

Goal I strives to maintain the continuation of existing settlement patterns that have developed within the region over the decades. This goal recognizes that the area's communities, especially the rural enclaves such as Malibou Lake and Old Agoura and other more remote areas, have cultures and characteristics which are important community assets. These communities provide a sense of refuge from the urban expanse of the Los Angeles metropolitan area. For purposes of this plan, 'rural' is defined as:

' A way of life characterized by living in a low density environment with resultant positive qualities, including, but not limited to: fewer people; a natural, peaceful, quiet setting; the allowance for a sense of solitude; unhindered views of the stars in the night sky; and equestrian and agrarian uses that are sensitive to the land. Coupled with these positive qualities, rural areas can be further defined as those unencumbered by typical urban/suburban facilities, including: curbs, gutters, sidewalks, street lighting,

formal and manicured landscaping, traffic signals, and commercial facilities dependant on large consumer volumes such as shopping centers.'

12

The best approach to development in the Plan area, where feasible, is to embrace the area's rural and semi-rural character."

The above narrative accurately describes Old Agoura and the body of the NAP captures why it is a worthy goal to protect and maintain its resident's way of life. At the January, 2007 hearing, Supervisor Yaroslavsky asked RPD Planner Szalay if the Heschel proposal was in compliance with the NAP. Mr. Szalay replied that, in his opinion, it was. A one-sentence answer to a one sentence question is a ridiculous conclusion to an issue as important and complicated as the question of a proposal's conformance to the General Plan.

13

The above examples are but an illustration of why the Heschel Day School West is not consistent with the policies of the NAP. A careful reading of the entire plan will prove why the school cannot be allowed to be built in the proposed location. A political whim is not a socially acceptable or legal way to trump established planning control.

Requiring the City of Agoura Hills to pick up the financial obligation for a private school that is far from local serving is a significant negative impact that is not being mitigated. In fact, it is interesting to note, that in January of 2007, the applicant announced that they were entering into a joint operation

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of a single middle school with Kadima Academy of West Hills, CA, effective September 2007. A review of the Kadima Academy website confirms this development and states that this newly created jointly operated middle school called Kadima Heschel West Middle School will be serving the Jewish community of both the West San Fernando Valley and the Conejo Valley, and that the permanent middle school will be housed on the Heschel owned site off Chesebro in Agoura. It appears that the residence location of the Kadima middle schoolers may not have been included in the distance exhibit referenced in applicants Environmental Analysis. It also does not appear that the applicant has noted this new operational structure in their supplemental EIR; namely that they have merged their middle school with another school over 9 miles away to the northeast and that the joint middle school will ultimately be housed on the Chesebro site and is designed to serve both the West San Fernando Valley and the Conejo Valley. Clearly, by no stretch of the imagination can this new middle school be considered **"local serving"**. 14

IV.

SUPERVISOR YAROSLAVSKY'S BIAS PRECLUDES HIS PARTICIPATION IN THE BOARD'S DECISION MAKING PROCESS 15

OAHA has witnessed several instances during this process in which Supervisor Yaroslavsky has compromised the integrity of the process. He has appeared at the applicant's events, including at least one fund raiser for the project proposed. He has indicated in conversations with members of the

City, members of the Las Virgenes Homeowners Association, and members of the OAHA, all outside of the public process, that the CUP will be granted, and that the only question will be how big the school will be, with no apparent concern for the legal issues presented by compliance with CEQA or the North Area Plan.

Supervisor Yaroslavsky has predetermined the issuance of the CUP, and predetermined the result of the instant appeal. In doing so he has acted outside of his authority, and contrary to law. To the extent the other Supervisors rely upon his decisions in that he is "the supervisor" for the proposed development, they, too, will be making a decision with no basis in fact, and no objective justification to support it.

OAHA acknowledges that the mere appearance of bias is insufficient to taint an otherwise lawful process, however, OAHA believes that in this case it can prove actual bias because in addition to the conduct and statements of the Supervisor, he has also: 15

- failed to require the applicant's compliance with CEQA;
- failed to require the applicant's compliance with the Board's directive;
- arbitrarily limited the opportunity of all parties in opposition to the EIR to present their issues to the Board in any meaningful way; and
- predetermined the issue in favor of the applicant, making the entire process an exercise in futility.

Any one of these examples, if it were alone in the universe, would probably be insufficient to prove bias, but when culled together along with the specific dates and places where he has appeared and made statements

indicate to OAHA that Supervisor Yaroslavsky's bias toward the applicant in this case is as deep as it is intransigent, creating a serious breach of the due process of law guaranteed to all parties in opposition to the EIR. 15

OAHA hereby requests that Supervisor Yaroslavsky recuse himself from any consideration of this matter, and that the appeal process begin anew without his predetermination of issues and obvious bias in favor of the applicant.

V.

CONCLUSION

CEQA and the North Area Plan require at a minimum a comprehensive examination of development on the land in question. In January, 2007, the Board of Supervisors substantially and fundamentally changed the project proposed by the applicant and requested that the applicant develop an interim school plan with all appropriate and complete mitigation. The applicant has failed to do so. Despite almost ten years of study and planning, the applicant has failed to provide anything close to a project that satisfies either CEQA or the North Area Plan. This is so simply because the land the applicant purchased is inherently inappropriate for a school. No mitigation can change the very real facts that the land is in the sweep of a known wildfire path in a Class 4 Fire Danger Area; the land is adjacent to a semi-rural community already impacted by a large, comprehensive pubic high school, and the infrastructure of the surrounding community makes impossible the traffic mitigation the proposed project requires in that the streets cannot be widened or improved in any meaningful way to support the proposed school. OAHA respectfully requests that the 16

Board put an end to the applicant's ridiculous attempt to fit a square peg in a round hole and deny the applicant's request for a CUP at the proposed site.

In conclusion, we again urge you to require the applicant to fully comply with its CEQA obligations and the mandates of the North Area Plan. Further, we implore you to restrain from allowing an interim use or campus until the full affects of the permanent campus can be determined, and until the full mitigations are completed and operational. 16

Respectfully Submitted,

The Old Agoura Homeowners Association

By: _____

Jess Thomas, President

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Old Agoura Homeowners Association
Letter Dated November 14, 2007

Response 1

This comment represents opinion that is not directed at the adequacy or completeness of the SEA. The comment will be forwarded to the Board of Supervisors for consideration during their deliberations on this project.

Response 2

The Board of Supervisors directed staff to conduct an environmental assessment for an interim school capable of supporting a student body of 390 students using a traffic plan that incorporates bussing or carpool programs and considers alternative points of access. Those requests made by the Board that did not involve changes to the project phasing, operation, or design are addressed outside the CEQA review process by the staff report or applicant presentations.

Refer to **Section 2.0** of the Final Supplemental EIR for a description of the Interim School Project. Consistent with the Board's request and CEQA requirements, the SEA focused on the direct physical changes of the interim plan on the environment. The analysis for buildout of the school as described in CUP No. 98-062 is fully evaluated in the Revised Draft EIR. Therefore, the focus of the SEA was to determine whether the proposed Interim School Project would cause any new impacts not previously disclosed nor increase the severity of an existing impact identified in the Revised Draft EIR.

Response 3

Refer above to Response No. 2. Operation of the interim school provides capacity for fewer students (390 vs. 750), incorporates bussing or carpooling programs, lessens the volume of earthwork (63,944 cubic yards to 40,302 cubic yards), and reduces the depth of cuts for the access roads (59 feet to 47 feet). For these reasons, staff determined that effects of the Interim School Project, for the majority of impacts, would be less than for the project at buildout. However, the SEA focused upon the areas most likely to be impacted, i.e., traffic, air quality, and noise.

Response 4a

Refer to **Section 1.0** for a description of the Interim School Project analyzed in the SEA. Consistent with the direction of the Board, the grading plan has been modified to reduce the volume of earthwork, and depth of cuts associated with grading for project access. Therefore, the impacts of the Interim School

Project are reduced when compared to the project evaluated in the Revised Draft EIR and no further analysis was needed. Refer to Response No. 3 for more information.

Response 4b

This comment is not directed at the adequacy or completeness of the SEA. The opinion noted in this comment will be forwarded to the Board for consideration during deliberations on this project.

Response 5

Calculation of a "Fair Share" contribution is a common means of assigning a proportionate share of the cost to fund needed improvements. The calculation is based on the percentage of project generated vehicle trips that travel through an impacted intersection and the cost to construct the identified improvement. The project's contribution to the volumes at each of the studied intersection locations can be found in **Tables 4.2-14(a)** through **4.2-14(c)**.

Response 6

This comment is not directed at the adequacy or completeness of the SEA. The opinion noted in this comment will be forwarded to the Board for consideration during deliberations on this project.

Response 7

This comment is not directed at the adequacy or completeness of the SEA. The opinion noted in this comment will be forwarded to the Board for consideration during deliberations on this project.

Response 8

This comment is not directed at the adequacy or completeness of the SEA. The opinion noted in this comment will be forwarded to the Board for consideration during deliberations on this project.

Response 9

Consistent with *CEQA Guidelines* Section 15124(b), the Revised Draft EIR identifies the objectives sought by the applicant. This comment is not directed at the content or analysis of the SEA so no further response is required.

Response 10

This comment is beyond the scope of the SEA. A reasonable range of feasible alternatives was identified in the Revised Draft EIR, which is incorporated by reference in **Section 1.3** of the SEA.

Response 11

This comment is beyond the scope of the SEA. The traffic consultant has continually monitored traffic volumes on studied roadway segments over the course of the project review process. For example, during preparation of the SEA the consultant reviewed the recently approved Agoura Village Specific Plan EIR to examine assumptions on the location and total volumes of cumulative project trips and compare them against the cumulative analysis contained in the Revised Final EIR. The findings of the comparison indicated that the assumptions utilized in the Revised Draft EIR are more conservative than the assumptions raised in this recent environmental document.

Response 12

These comments are beyond the scope of the SEA. All of the issues raised in these comments were addressed as part of the Final EIR review for the project, which is incorporated by reference in **Section 1.3** of the SEA. Refer to Response No. 2

Response 13

These comments are beyond the scope of the SEA. All of the issues raised in these comments were addressed in the Revised Draft and Final EIR, which are incorporated by reference in **Section 1.3** of the SEA.

Response 14

CEQA Guidelines Section 15124 requires that an EIR describe a project's technical, economic, and environmental characteristics. Consistent with this directive, the Revised Draft EIR discussed current and projected future enrollment data provided by the applicant. Refer to **Section 1.0** of the Revised Draft EIR. The enrollment data indicates that the majority of students attending the existing school are located within the Conejo Valley. This trend is assumed to continue with the operation of the Project.

Nothing on file with the County suggests a change in operational characteristics from those identified in the CUP, so it would be speculative to assume that the applicant is merging with another school. CEQA Guidelines Section 15145 specifically discourages speculation in an EIR.

Response 15

This comment is not directed at the content or adequacy of the Revised Draft EIR. The comment will be forwarded to the Board for consideration during their deliberations on the project.

Response 16

This comment is not directed at the content or adequacy of the Revised Draft EIR. The comment will be forwarded to the Board for consideration during their deliberations on the project.

MITIGATION MONITORING PROGRAM – Heschel School Project – 98-062 (Revised 11/19/07)

INTRODUCTION The Mitigation Monitoring Program for the Heschel West School Project describes the procedures the applicant and others will use to implement the mitigation measures adopted in connection with the approval of the proposed project and the methods of monitoring such actions. A monitoring program is necessary only for impacts that would be significant if not mitigated. The following consists of a monitoring program table applicable to the Heschel West School Project, noting the responsible agency for mitigation monitoring, the schedule, and a list of all project-related mitigation measures.

PURPOSE The Mitigation Monitoring Program (MMP) has been prepared in conformance with Section 21081.6 of the California Environmental Quality Act. It is the intent of this program to (1) verify satisfaction of the required mitigation measures of the EIR; (2) provide a methodology to document implementation of the required mitigation; (3) provide a record of the Monitoring Program; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the frequency and duration of monitoring; and (7) utilize existing review processes wherever feasible.

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.1	**VISUAL RESOURCES**				
4.1-1	Landscaping consisting of natural vegetation shall be placed along the southern perimeter of Chesebro Road, as defined on the site plan. The purpose of this vegetation is to screen vistas of the completed project from motorists, walkers, and riders. Installation of this vegetative screen shall occur prior to grading. Maintenance and monitoring reports shall be prepared annually for a minimum of three years to ensure the long-term completion of this mitigation measure.	Applicant (Project Landscape Architect)	Review of Landscape Plan and Field Verification	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. Prior to issuance of Grading Permits	
4.1-2	A landscape/revegetation plan shall be prepared by a registered landscape architect for review and approval by the County of Los Angeles Department of Regional Planning and California Department of Fish and Game (CDFG) prior to the issuance of the grading permit. The landscape/revegetation plan shall utilize indigenous plants and shall avoid invasive, non-native ornamentals to the maximum degree feasible.	Project Applicant	Review of Landscape Plan and Field Verification	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. Prior to Issuance of Grading Permits	

Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.1 VISUAL RESOURCES (cont'd)				
4.1-3 The applicant shall prepare a lighting plan that identifies the type, layout, and luminaire wattage. At a minimum the plan shall conform to the requirements defined below. The County of Los Angeles Department of Regional Planning shall approve final lighting orientation and design. (1) Nuisance Prevention: All outdoor lighting fixtures shall be designed, located, installed and aimed downward or toward structures—if the light is effectively contained by the structure and no glare is visible off site—to prevent glare, light trespass and light pollution. No lights shall be directed toward nearby residences or open space. (2) Lighting Levels: Outdoor lighting installations shall be designed to avoid harsh contrasts in lighting levels between the project site and the adjacent properties. • The illumination provided by parking lot lighting shall average no more than 0.05 watts/square foot, which equates to a lighting power density consistent with parking lots in Lighting Zone 2. • The illumination provided by on-site roadway lighting shall average no more than 0.03 watts/square foot, which equates to a lighting power density consistent with a two-lane roadway in Lighting Zone 2. • The illumination provided by on-site walkway lighting shall average no more than 0.08 watts/square foot, which equates to a lighting power density consistent with walkways in Lighting Zone 2.	Applicant	Review and Approve Final Lighting Plan and Field Verification	1. LA County Department of Regional Planning 2. LA County Departments of Regional Planning and Public Works 3. Prior to Issuance of Building Permits	

Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.1 VISUAL RESOURCES (cont'd)				
4.1-3 (cont'd) (3) Lamp Types: Metal Halide of high-pressure sodium lamps should be used in all areas deemed as security risks. Low wattage incandescent or compact florescent lamps should be used in all other portions of the campus.				
(4) Fixture Types: All outdoor lighting shall use cut-off luminaries with the light source downcast and fully shielded with no light emitted above the horizontal plane so that light sources are not visible to surroundings.				
(5) Accent Lighting: Architectural features may be illuminated by uplighting provided that the light is effectively contained by the structures, the lamps are low intensity used only to provide subtle lighting effects and no glare or light trespass is produced.				
(6) Security Lighting: Security lighting should be activated with motion sensors to the extent feasible.				
4.1-4 Project structures shall utilize non-reflective glass to avoid glare intruding onto adjacent residential properties.	Project Applicant and Construction Contractor	Review and Approval of Building Plans	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. Prior to issuance of Building Permits	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.2	**TRANSPORTATION AND ACCESS**				
4.2-1	Canwood Street and Chesebro Road at Driver Avenue and Palo Comado Canyon Road – This unsignalized intersection currently meets the County's warrant for traffic signal installation, indicating that a traffic signal is necessary at this location to accommodate existing traffic volumes. Therefore, the project should contribute its fair share toward installation of a signal. However, the intersection is under the jurisdiction of the City of Agoura Hills. Should the City of Agoura Hills determine that a traffic signal is unacceptable, the following alternative "non-signalized" improvement is recommended: • Improve the eastbound and westbound approaches of this intersection (Driver Avenue, and Palo Comado Canyon Road, respectively) to install an exclusive left-turn lane, in addition to a shared through/right-turn lane, in both directions. Some minor roadway widening on both approaches within the existing rights-of-way will be required in order to implement this improvement. The intersection will remain four-way stop sign controlled. • To monitor the timing of implementation, the applicant shall prepare annual enrollment reports for submittal to the Los Angeles County Department of Public Works. This mitigation measure shall be implemented before enrollment reaches 660 private school students and 20% of the total preschool enrollment.	Project Applicant and Construction Contractor	Payment of Fair Share Amount to City of Agoura Hills with Funding Verification to LA County Departments of Regional Planning and Public Works Review and Approve annual enrollment reports Field Verification	1. LACDPW 2. LACDPW 3. Prior to issuance of Building Permits	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.2	**TRANSPORTATION AND ACCESS (cont'd)**				
4.2-2	Palo Comado Canyon Road at US 101 Westbound Ramps – Two alternative improvements are proposed for this location. Either of these recommended improvements could mitigate project impacts but only the roundabout is authorized under CUP 98-062 to be implemented prior to initial occupancy of the school, and will provide appropriate traffic control for the intersection, and will accommodate the new project's Canwood Street access location as part of an expanded intersection configuration. (a) Roundabout – Reconstruct the intersection, including all approaches, to install a new traffic roundabout, more commonly known as a "traffic circle." As proposed, the recommended roundabout design would include an approximately 45- to 50-foot radius inner circle, with a single travel lane around the circle. The roundabout would control all approaches to this intersection, including both the northbound and southbound Palo Comado Canyon Road approaches, the westbound US 101 on/off ramps, and the Canwood Street approach. It is possible that some or all of these approaches would be "flared" to provide two storage lanes, and the minor approach from Canwood Street may also be "yield" sign controlled. In consultation with the City of Agoura Hills, the final design of the roundabout shall be reviewed and approved by Caltrans and the County Department of Public Works, and may require rights-of-way in excess of that currently available.	Project Applicant and Construction Contractor	Review and Approve Project Study Report for intersection improvements	1. LACDPW, Caltrans 2. LACDPW, Caltrans 3. Prior to issuance of Grading Permits	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.2	**TRANSPORTATION AND ACCESS (cont'd)**				
4.2-3	Chesebro Road and US 101 Eastbound Ramps at Dorothy Drive – This unsignalized intersection currently meets the County's warrant for traffic signal installation, indicating that a traffic signal is necessary at this location to accommodate existing traffic volumes. Therefore, the project should contribute its fair share toward installation of a signal. However, if a traffic signal is found to unacceptable, the following alternative "non-signalized" improvement is recommended: • Re-stripe the northbound approach of this intersection to provide one shared left-turn/through lane, and one shared through/right-turn lane. Re-stripe the US 101 on ramp to provide two receiving lanes. The right lane of the on ramp should be striped as a "drop lane," which merges with the left lane. • To monitor the timing of implementation, the applicant shall prepare annual enrollment reports for submittal to the Los Angeles County Department of Public Works. This mitigation measure shall be implemented before enrollment reaches 80% of the proposed total (approximately 531 of the 660 private school students).	Project Applicant and Construction Contractor	Payment of Fair Share Amount to City of Agoura Hills with Funding Verification to LA County Departments of Regional Planning and Public Works Review and Approve annual enrollment reports Field Verification	1. LACDPW, Caltrans 2. LACDPW, Caltrans 3. Prior to enrollment reaching 531 students	
4.2-4	Palo Comado Canyon Road Improvements – Prior to initial occupancy of the school, Palo Comado Canyon Road shall be improved along the west side to complete a 32-foot half roadway from Canwood Street/Chesebro Road to the westbound US 101 on ramp.	Project Applicant and Construction Contractor	Field Verification Encroachment Permit from City of Agoura Hills	1. LACDPW 2. LACDPW 3. Prior to issuance of Building Permits	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.2	**TRANSPORTATION AND ACCESS (cont'd)**				
4.2-5	At the time a fee district for roadway improvements is established within the North Area Plan, the project applicant shall contribute a "fair share" amount, as determined by the fee structure established for the district, to fund widening of the Chesebro Road overpass and reconfiguration of the Kanan Road interchange consistent with the proposed circulation improvements identified in the Santa Monica Mountains North Area Plan.	Project Applicant	Payment of Fair Share Amount with Funding Verification to LA County Department of Regional Planning	1. LACDPW 2. LACDPW 3. At time of fee district establishment	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.2	**TRANSPORTATION AND ACCESS (cont'd)**				
4.2-6	Canwood Street and Chesebro Road at Driver Avenue and Palo Comado Canyon Road – In addition to Mitigation Measure 4.2-1, re-stripe the eastbound approach of this intersection (Driver Avenue) to install an exclusive left-turn lane, in addition to a shared through/right-turn lane, and restripe the southbound approach of the intersection (Chesebro Road) to provide an exclusive left-turn lane plus a shared through/right-turn lane. Some minor roadway widening within the existing right-of-way will be required in order to implement this improvement. However, if the traffic signal is not acceptable, the following "non-signalized" improvement is recommended: • In addition to the installation of the eastbound left-turn lane to address project specific mitigation, further improve the eastbound approach of this intersection (Driver Avenue) to install an additional through lane, for a final approach configuration of one exclusive left-turn lane, one through lane, and one shared through/right-turn lane. It is likely that additional rights-of-way will be needed in order to accommodate the roadway widening necessary to implement this cumulative improvement, and the project shall pay its fair share toward the cost of acquiring any necessary rights-of-way. The intersection would retain the existing four-way, stop-sign control.	Project Applicant	Payment of Fair Share Amount to City of Agoura Hills with Funding Verification to LA County Department of Regional Planning and Public Works Field Verification	1. LACDPW 2. LACDPW 3. Prior to issuance of Building Permits	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.2	**TRANSPORTATION AND ACCESS (cont'd)**				
4.2-7	Palo Comado Canyon Road at US 101 Westbound Ramps – No additional improvements are necessary under the "roundabout" alternative improvement at this location, as the proposed measure will be adequate to reduce cumulative impacts at this intersection to less than significant levels. However, if the traffic signal improvement alternative is implemented, an additional through lane should be installed for both the northbound and southbound approaches, in addition to a new northbound left-turn lane. The cumulative improvement will result in a final intersection configuration of one left-turn lane, one through lane, and one shared through/right-turn lane for northbound traffic, and one left-turn lane, two through lanes, and one right-turn lane for the southbound approach. This ultimate improvement would require the existing two-lane bridge crossing the US 101 to be widened to its full width. The project is required to contribute its fair share funding toward this improvement.	Project Applicant and Construction Contractor	Payment of Fair Share Amount to City of Agoura Hills with Funding Verification to LA County Departments of Regional Planning and Public Works Field Verification	1. LACDPW 2. LACDPW 3. Prior to issuance of Building Permits if traffic signal alternative is implemented.	
4.2-8	Chesebro Road and US 101 Eastbound Ramps at Dorothy Drive – No additional improvements beyond the recommended project-specific improvement measure are necessary to address cumulative impacts whether the traffic signal or "non-signalized" improvement is selected.	See MM 4.2-3	See MM 4.2-3	See MM 4.2-3	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.2	**TRANSPORTATION AND ACCESS (cont'd)**				
4.2-9	Chesebro Road and Palo Comado Canyon Road at Chesebro Road – Install a traffic signal at this location, which is forecast to meet warrants under future 2010 ambient growth conditions. If a traffic signal is not acceptable, re-stripe the intersection to provide one left-turn lane and one right-turn lane for the eastbound (Chesebro Road) approach. Re-stripe northbound Palo Comado Canyon Road to add an exclusive left-turn lane in addition to a single through lane. Re-stripe the westbound direction of Chesebro Road west of Palo Comado Canyon Road to provide two "receiving" lanes (one each for the new northbound left-turn lane and for the existing southbound right-turn lane from Palo Comado Canyon Road.	Project Applicant and Construction Contractor	Payment of Fair Share Amount to City of Agoura Hills with Funding Verification to LA County Departments of Regional Planning and Public Works Field Verification	1. LACDPW 2. LACDPW 3. Prior to issuance of Building Permits	
4.2-10	Chesebro Road and Laura La Plante Drive at Agoura Road – Install a traffic signal at this location, which is forecast to meet warrants under future 2010 ambient growth conditions. If a traffic signal is not acceptable, re-stripe this intersection to provide a left-turn only lane and one shared through/right-turn only lane for the eastbound approach, one shared left-turn/through lane plus a right-turn lane on the westbound approach, and one left-turn lane and one shared through/right-turn lane for the southbound approach.	Project Applicant and Construction Contractor	Payment of Fair Share Amount to City of Agoura Hills with Funding Verification to LA County Department of Regional Planning and Public Works Field Verification	1. LACDPW 2. LACDPW 3. Prior to issuance of Building Permits	
4.3	**NOISE**				
4.3-1	All construction activity occurring on the project site shall adhere to the requirements of the County of Los Angeles Construction Equipment Noise Standards, County of Los Angeles Ordinance No. 11743, Section 12.08.440 as identified in Table 4.3-3 of the Draft EIR.	Project Applicant and Construction Contractor	Field Verification	1. LACDPW, Building and Safety Division 2. LACDPW, Building and Safety Division 3. During Grading and Construction	
4.3-2	All construction equipment, fixed or mobile, shall be in proper operating condition and fitted with factory standard silencing features, including the muffling and shielding of intakes and exhausts.	Project Applicant and Construction Contractor	Field Verification	1. LACDPW, Building and Safety Division 2. LACDPW, Building and Safety Division 3. During Grading and Construction	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.3	**NOISE (cont'd)**				
4.3-3	All construction truck traffic shall avoid residential areas and other sensitive receptors.	Project Applicant and Construction Contractor	Field Verification	1. LACDPW, Building and Safety Division 2. LACDPW, Building and Safety Division 3. During Grading and Construction	
4.3-4	Construction equipment shall be turned off when not in direct use.	Project Applicant and Construction Contractor	Field Verification	1. LACDPW, Building and Safety Division 2. LACDPW, Building and Safety Division 3. During Grading and Construction	
4.3-5	Sound blankets shall be used on all construction equipment for which use of sound blankets is technically feasible.	Project Applicant and Construction Contractor	Field Verification	1. LACDPW, Building and Safety Division 2. LACDPW, Building and Safety Division 3. During Grading and Construction	.
4.3-6	Portable acoustical barriers shall be placed along the back property boundary of the adjacent residential uses during grading activity associated with Phase I and II of campus construction.	Project Applicant and Construction Contractor	Field Verification	1. LACDPW, Building and Safety Division 2. LACDPW, Building and Safety Division 3. During Grading and Construction	
4.3-7	All stationary and point sources of noise (e.g., bells amplified sound, etc.) occurring on the project site shall adhere to the requirements of the County of Los Angeles Ordinance No. 11743, Section 12.08.390 as identified in Table 4.3-2 of the Draft EIR, County of Los Angeles Exterior Noise Standards for Stationary and Point Noise Sources.	Applicant	Field Verification	1. LA County Department of Health Services 2. LA County Department of Building and Safety 3. During Life of Project	
4.3-8	No amplified sound shall be generated between the hours of 8:00 P.M. and 8:00 A.M. All school bells shall be oriented away from adjacent residential areas.	Applicant	Field Verification	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. During Life of Project	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.5	**BIOLOGICAL RESOURCES**				
4.5-1	As a means of special-status species protection, prior to any grading/construction activities, pre-grading surveys for the mariposa lily and morning glory shall be conducted by a qualified botanist. Pre construction reports shall be provided to the County of Los Angeles Department of Regional Planning. The loss of any such species would be mitigated through on-site enhancement as articulated below under MM 4.5-6.	Applicant (Project Biologist)	Review of Pre Grading/Construction Survey Findings	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. Prior to and during Grading and Construction activity	
4.5-2	Prior to any grading/construction activities, the County shall install temporary fencing where site grading occurs adjacent to natural habitat to the north. Fencing shall be maintained and monitored by the applicant for the duration of the grading/construction period. Monthly reports shall be provided to the County of Los Angeles Department of Regional Planning.	Applicant (Project Biologist)	Field Verification And Review of Monthly Status Reports	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. Prior to and during Grading and Construction activity	
4.5-3	No earlier than 20 days prior to any grading activity that would occur during the breeding season, pre-construction/grading survey of the entire area proposed for grading/construction activities for any special-status bird species shall be conducted by a qualified biologist. If nests of special-status or other protected migratory bird species are observed, construction within 100 feet shall be postponed or halted at the discretion of the biological monitor, until the nest site is vacated and juveniles have fledged, as determined by the biologist. Implementation of this measure would ensure that no loss of active nests of either species will occur and, therefore, will reduce impacts on nesting birds to a less than significant level. Pre construction reports shall be provided to the County of Los Angeles Department of Regional Planning.	Applicant (Project Biologist)	Review of Pre-Construction Survey Results And Field Verification	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. Prior to and during Grading and Construction activity	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.5	**BIOLOGICAL RESOURCES (cont'd)**				
4.5-4	Bird nests, which are state and federally protected, will not be disturbed during and following construction activities. The nesting/breeding season of native bird species potentially nesting on the site is typically February through August. In order to determine if active nests of bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present in the construction zone or within 300 feet (500 feet for raptors) of the construction zone, the applicant shall have weekly field surveys conducted by a qualified biologist between 45 to 20 days (only) prior to construction activities. If active nests are found, a minimum 300-foot (this distance may be greater depending on the bird species and construction activity, as determined by the biologist) fence barrier shall be erected around the nest site and clearing and construction within the fenced area shall be postponed or halted, at the discretion of the biological monitor, until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of a second attempt at nesting. The biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. In addition, fuel modification activities, including vegetation removal and pruning, will not be conducted during the nesting season (February through August).	Applicant (Project Biologist)	Review of Pre-Construction Survey Results And Field Verification	1. LA County Department of Regional Planning, CDFG 2. LA County Department of Regional Planning, California Department of Fish and Game 3. Prior to and during Grading and Construction activity	
4.5-5	Construction personnel shall be instructed on the sensitivity of the area. The project applicant or qualified biologist will record the results of the recommended protective measures described in order to document compliance.	Applicant (Project Biologist)	Review of Instructional Material on Protection Measures	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. Prior to and during Grading and Construction activity	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.5	**BIOLOGICAL RESOURCES (cont'd)**				
4.5-6	A revegetation and maintenance plan shall be developed prior to the issuance of a grading permit by a qualified habitat restoration specialist acceptable to the Director of Planning, to be retained by the applicant, that describes the specific actions, tasks, and methodologies to address the revegetation, enhancement, and maintenance of revegetated or restored habitat areas. The plan would specify, at a minimum, the following: (1) the location of revegetation and enhancement areas; (2) the quantity and species of plants to be planted as well as those to be removed; (3) planting procedures, including the use of soil preparation and irrigation; (4) a schedule and action plan to maintain and monitor the plantings for a minimum five-year period; and (5) a list of criteria (e.g., growth, native plant cover, survivorship) by which to measure success of the plantings, as well as contingency measures if the plantings are not successful. This plan shall be approved by the County LA County Department of Regional Planning, National Park Service, and other appropriate resource agencies. At a minimum, the plan will provide for the following replacement ratios and monitoring requirements:	Applicant (Project Biologist)	Review and Approve Revegetation and Maintenance Plan	1. LA County Department of Regional Planning, National Park Service, California Department of Fish and Game 2. LA County Department of Regional Planning, National Park Service, California Department of Fish and Game 3. Prior to Issuance of Grading Permits	

Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.5 BIOLOGICAL RESOURCES (cont'd)				
4.5-6 (cont'd) • The direct loss of needlegrass grassland community shall be replaced at a 2:1 ratio by revegetating land that currently supports California annual grassland vegetation. The mitigation area will be located on site or at an alternative site approved by the CDFG and the Department of Regional Planning (LA County Department of Regional Planning). Because of the disturbed nature of the on-site California annual grassland community and because it does not support Rare, Threatened, or Endangered species, the replacement of portions of this non-native grassland community with a native grassland community will not result in additional significant impacts.				
• The direct loss of purple sage-California sagebrush vegetation shall be replaced at a 1:1 ratio by enhancing remaining on-site disturbed or degraded vegetation.				
• CDFG, the County of Los Angeles and the selected biological monitor shall approve a monitoring plan. At a minimum, the plan shall include quarterly monitoring by a qualified biologist for the first three years, and on an annual basis for two following years. During each monitoring visit, hand removal of non-native vegetation will be conducted. Approved success criteria shall be based on an overall percentage of vegetation cover and percentage of non-native plant species consistent with on-site high-quality purple sage-California sagebrush habitat.				

Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.5 BIOLOGICAL RESOURCES (cont'd)				
4.5-7 The following measures will be required in order to comply with local, state, and federal regulations regarding impacts to ACOE, CDFG, NRCS, and RWQCB jurisdictional areas: (a) If determined practicable following review of the project plans by the Los Angeles County Fire Department, fuel modification zones shall not be closer than 75 feet to existing jurisdictional drainages. (b) Permitting as required by ACOE and RWQCB shall be executed pursuant to Section 404 of the federal Clean Water Act, for all impacts to "waters of the U.S." All conditions of the permits and certifications from these agencies that are designed to minimize impacts to biological resources and all measures to mitigate for the loss of jurisdictional habitats shall be implemented. Prior to permitting, representatives of the ACOE must conduct a field verification, and subsequent certification, of the biological conditions, functions, (i.e., intermittent or ephemeral water flow) and extent of jurisdictional resources on the site. (c) If necessary, a Streambed Alteration Agreement shall be executed with CDFG under provisions of Section 1603 of the California Fish and Game Code. All conditions of that agreement designed to minimize impacts to biological resources and all measures to mitigate for the loss of jurisdictional habitats shall be implemented.	Project Applicant	Review and Approve Fire/Vegetation Management Plan And Review ACOE and CDGF Permits And Field Verification	1. Army Corps of Engineers, California Department of Fish and Game, and Regional Water Quality Control Board 2. LA County Department of Regional Planning 3. Prior to Issuance of Grading Permits	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.5	**BIOLOGICAL RESOURCES (cont'd)**				
4.5-8	In order to protect the native plant communities that are located within the natural open space areas of the site, the plants listed in Table 4.5-5 in the Draft EIR will not be planted. In addition, the landscaped areas and the fuel modification zone shall utilize locally indigenous plants to the greatest extent feasible. The landscaping plans for the project shall be reviewed by a qualified botanist and LA County Department of Regional Planning for approval prior to grading permit who shall recommend appropriate provisions to prevent other invasive plant species from colonizing remaining natural areas.	Applicant (Project Biologist)	Review Landscaping Plans	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. Prior to Issuance of Grading Permits	
4.5-9	The applicant will obtain a County-approved biological monitor to coordinate and periodically monitor construction activity to ensure that incidental construction impacts on biological resources are avoided or minimized. The monitor will be given authorization to stop specific construction activities if violations of mitigation measures or any local, state, or federal laws are suspected. Responsibilities of the monitor include: • Review/stake the construction limits in the field with the contractor and the County inspector in accordance with the final approved grading plan. The limits shall clearly delineate the location of Catalina mariposa lilies, California black walnuts, Valley oak tree, jurisdictional drainages, and the preserved natural open space areas on site.	Project Applicant	Field Verification	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. Prior to and during Grading and Construction activity	

Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.5 BIOLOGICAL RESOURCES (cont'd)				
4.5-9 (cont'd) • Prepare an instruction sheet for all equipment operators who will work on the site. The instruction sheet shall include information that will be stated in the CDFG Streambed Alteration Agreement, including, but not limited to, nesting bird information, protection of the preserved jurisdictional areas from litter, contaminants, and debris. Each operator will be required to sign an acknowledgment that they are aware of these conditions and that their violation of such conditions may result in their termination of work on the site and financial responsibility for correction of damage.				
• The biological inspector shall conduct meetings with the contractor and other key construction personnel to describe the importance of restricting work to within the grading limit and outside of the preserved areas and to emphasize the sensitivity of nesting birds. The inspector should also discuss staging/storage areas for construction equipment and materials. The biological inspector shall investigate all on-site storage areas to minimize impacts to biological resources. Construction access, parking, storage of equipment and materials shall not occur within 25 feet of the dripline of any California black walnut or Valley oak trees.				

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.5	**BIOLOGICAL RESOURCES (cont'd)**				
4.5-10	The construction contractor will ensure that temporary chain-link fencing is installed at the limit of grading near sensitive resources identified by the biological monitor. The fencing will remain in place until grading and excavation work is complete, and will be removed under the direction of the biological inspector. Prior to fence installation, the fencing contractor will be instructed to avoid driving on or immediately adjacent to sensitive biological resources, including remaining trees, remaining jurisdictional resources, and remaining natural habitats.	Project Applicant and Construction Contractor	Field Verification	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. Prior to and during Grading and Construction activity	
4.5-11	Where necessary, erosion control measures shall be constructed on the slopes below grading areas to prevent erosion and deposition of materials into areas with remaining California black walnut or Valley oak trees during grading and construction activities. These erosion control measures will also prevent silts from entering drainages.	Project Applicant and Construction Contractor	Review of Stormwater Pollution Prevention Plan	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. Prior to and during Grading and Construction Activity	
4.6	**GEOTECHNICAL HAZARDS**				
4.6-1	The project design and construction shall incorporate and implement all of the recommendations in the Gorian geotechnical investigation dated May 1999, and all geotechnical recommendations developed as part of more detailed project design.	Applicant (Geotechnical Engineer, Engineering Geologist)	Grading Plan Check and Field Verification	1. LACDPW, Geology/ Soils Section, and Building and Safety 2. LACDPW, Geology/ Soils Section 3. Prior to Approval of Final Grading Plans	
4.6-2	All aspects of grading, including site preparation, grading, and fill placement, shall be per the County of Los Angeles Building Code.	Applicant (Geotechnical Engineer)	Grading Plan Check and Field Verification	1. LACDPW, Geology/ Soils Section 2. LACDPW, Geology/ Soils Section 3. Prior to Approval of Grading Permits and Verify During Grading	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.6	**GEOTECHNICAL HAZARDS (cont'd)**				
4.6-3	Cut slopes may be constructed at a maximum gradient of 2:1. All cut slopes or backcuts for retaining walls must be observed by the project geotechnical consultant to verify absence of adverse geologic conditions. Where topsoil is present at the top of a cut slope, the top of the slope shall be "laid back" or rounded.	Applicant (Geotechnical Engineer)	Grading Plan check and Field Verification	1. LACDPW, Geology/ Soils, Building and Safety Division 2. LACDPW, Geology/ Soils, Building and Safety Division 3. Prior to Issuance of Grading Permits and Verify During Grading	
4.6-4	Fill slopes may be constructed at a maximum gradient of 2:1. Fill slopes shall be keyed and benched into firm in-place soil or bedrock. Fill slope keyways shall be a minimum of 15 feet wide and cut to a minimum depth of 2 feet at the toe into competent in-place materials. The keyway shall be tilted into the slope and shall be at least 3 feet deep at the heel (measured from below the slope toe elevation). The keyway shall be observed by the project geotechnical consultant prior to placing any fill.	Applicant (Geotechnical Engineer)	Grading Plan Check and Field Verification	1. LACDPW, Geology/ Soils, Building and Safety Division 2. LACDPW, Geology/ Soils, Building and Safety Division 3. Prior to Issuance of Grading Permits and Verify During Grading	
4.6-5	All slopes will require maintenance to reduce the risk of erosion and degradation with time due to natural or man-made conditions. Future performance of the slopes will depend on the control of the burrowing animals and maintenance of the brow ditches, drainage structures, and the slope vegetation as discussed below.	Applicant (Landscape Contractor)	Field Verification	1. LACDPW, Geology/ Soils, Building and Safety Division 2. LACDPW, Geology/ Soils, Building and Safety Division 3. During life of project	
4.6-6	All graded or exposed natural slopes shall be maintained with dense, deep rooting (minimum 2 feet deep), drought resistant ground cover and shrubs or trees. A reliable irrigation system shall be installed on the slopes where necessary, adjusted so over watering does not occur, and periodically checked for leakage. Care shall be taken to maintain a uniform, near optimum moisture content in the slopes, and to avoid over drying, or excess irrigation. Excess watering of slopes shall be avoided to reduce the risk of erosion and surficial failures. Slopes shall not be watered before forecasted rain.	Applicant (Landscape Contractor)	Field Verification	1. LACDPW, Geology/ Soils, Building and Safety Division 2. LACDPW, Geology/ Soils, Building and Safety Division 3. During life of project	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.6	**GEOTECHNICAL HAZARDS (cont'd)**				
4.6-7	All drainage structures shall be kept in good condition and clean the entire length to the outlet. Final grading of the site shall provide positive drainage away from slopes, and water shall not be allowed to pond or gather in a slope area. Burrowing animals, particularly ground squirrels, can destroy slopes; therefore, where present, immediate measures shall be taken to evict them.	Applicant (Geotechnical Engineer)	Grading Plan check and Field Verification	1. LACDPW, Geology/ Soils, Building and Safety Division 2. LACDPW, Geology/ Soils, Building and Safety Division 3. During life of project	
4.6-8	On-site materials obtained from excavations may be used as fill soils. Fill soils shall be free of all deleterious materials including trash, debris, organic matter, and rocks larger than 6 inches. Fill soils shall be placed in thin uniform lifts not exceeding 10 inches of uncompacted thickness, brought to 2% over the optimum moisture content, and compacted to a minimum of 90% relative compaction. The need for import fill is not anticipated. However, if needed, sources of import fill shall be approved by the project geotechnical consultant prior to transport of materials to the site.	Applicant (Geotechnical Engineer)	Field Verification	1. LACDPW, Geology/ Soils, Building and Safety Division 2. LACDPW, Geology/ Soils, Building and Safety Division 3. Prior to and During Grading and Construction Activity	
4.6-9	Remedial grading in the form of removals and recompaction is recommended to prepare all building pad areas and those locations where cut slopes are required near a landslide. Within areas of settlement sensitive structures and 5 feet beyond, removal operations must remove any highly compressible upper native soils. Where fill thickness varies significantly or a transition condition exists under a structure, additional removals as recommended in the Gorian geotechnical investigation shall be performed to reduce the potential for differential movement.	Applicant (Geotechnical Engineer)	Grading Plan check and Field Verification	1. LACDPW, Geology/ Soils, Building and Safety Division 2. LACDPW, Geology/ Soils, Building and Safety Division 3. Prior to and During Grading and Construction Activity	
4.6-10	Structures built as part of the project shall be designed in accordance with the seismic design factors in the latest version of the Uniform Building Code.	Project Applicant and Construction Contractor	Building Plan Check and Field Verification	1. LACDPW, Building and Safety Division 2. LACDPW, Building and Safety Division 3. Prior to issuance of Building Permits	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.6	**GEOTECHNICAL HAZARDS (cont'd)**				
4.6-11	Expansion tests shall be performed at the finish grade materials at the conclusion of grading for each building pad area.	Project Applicant and Construction Contractor	Grading Plan check and Field Verification	1. LACDPW, Geology/ Soils, Building and Safety Division 2. LACDPW, Geology/ Soils, Building and Safety Division 3. Prior to Issuance of Grading Permits and Verify During Grading	
4.6-12	Positive drainage shall be consistently provided and maintained away from all structures. Drainage shall not be changed creating an adverse drainage condition.	Project Applicant and Construction Contractor	Building Plan Check and Field Verification	1. LACDPW, Building and Safety Division 2. LACDPW, Building and Safety Division 3. During life of project	
4.6-13	Landscape watering shall be held to a minimum. Sprinkler systems shall be maintained and plumbing leaks shall be immediately repaired so the subgrade soils underlying or adjacent to the structures do not become saturated. Trees shall be spaced so that roots will not extend under foundations or slabs.	Project Applicant and Construction Contractor	Building Plan Check and Field Verification	1. LACDPW, Building and Safety Division 2. LACDPW, Building and Safety Division 3. During life of project	
4.6-14	Water shall not be allowed to pond or accumulate around the pool decking allowing water migration into the subgrade. All pool hardware fittings shall be adequately water tight, and caulking shall be maintained between hardscape joints, and the interfaces between the hardscape and the adjoining house.	Project Applicant and Construction Contractor	Building Plan Check and Field Verification	1. LACDPW, Building and Safety Division 2. LACDPW, Building and Safety Division 3. During life of project	
4.6-15	Information regarding the care and maintenance of improvements located on expansive soils shall be passed on to future owners of the property.	Project Applicant		1. LACDPW, Building and Safety Division 2. LACDPW, Building and Safety Division 3. During life of project	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.7	**FIRE SERVICES AND HAZARDS**				
4.7-1	Concurrent with the issuance of building permits, the applicant shall pay the Los Angeles County Fire Department Developer Fee in effect at that time based on actual building area.	Project Applicant	Submit Receipt to LA County DRP Verifying Fee Payment	1. LA County Department of Regional Planning, LA County Fire Department 2. LA County Department of Regional Planning, 3. Prior to Issuance of Building Permits	
4.7-2	The site plan for the proposed project shall provide sufficient capacity for fire flows of 5,000 gallons per minute at 20 pounds per square inch residual pressure for a five-hour duration for educational units and uses with a floor plan in excess of 35,000 square feet, or such other fire flow required by the County fire department.	Project Applicant	Verification of Required Fire Flows	1. LA County Fire Department, LACDPW 2. LACDPW 3. Prior to Issuance of Occupancy Permits	
4.7-3	Prior to framing, access, hydrants, and water supply shall be provided to comply with Section 902 of the Fire Code, which requires all weather access.	Project Applicant	Field Verification	1. LA County Fire Department, LACDPW 2. LA County Fire Department, LACDPW 3. Prior to Issuance of Building Permits	
4.7-4	Vehicular access must be provided and maintained serviceable to all required fire hydrants throughout construction.	Project Applicant	Field Verification	1. LA County Fire Department, LACDPW 2. LA County Fire Department, LACDPW 3. Prior to Issuance of Building Permits	
4.7-5	Prior to issuance of occupancy permits, the development shall comply with County Building and Safety Code and Fire Code requirements associated with the provision of adequate site vehicular access (County Fire Code 10.207), and fire prevention and suppression.	Project Applicant	Receipts of Wildfire Fuel Modification Plan and Field Verification	1. LA County Fire Department, LACDPW 2. LA County Fire Department, LACDPW 3. Prior to Issuance of Occupancy Permits	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.7	**FIRE SERVICES AND HAZARDS (cont'd)**				
4.7-6	Prior to Issuance of Building Permits, the project shall satisfy all conditions of approval for vehicular and fire department access.	Project Applicant	Field Verification	1. LA County Fire Department, LACDPW 2. LA County Fire Department, LACDPW 3. Prior to Issuance of Building Permits	
4.7-7	The applicant shall install fire department approved street signs and building numbers prior to issuance of occupancy permits.	Project Applicant	Field Verification	1. LA County Fire Department, LACDPW 2. LA County Fire Department, LACDPW 3. Prior to Issuance of Occupancy Permits	
4.7-8	The Fire/Vegetation Management Plan prepared for the project shall be reviewed and approved by the fire department Prior to Issuance of Building Permits.	Project Applicant	Review Fire/Vegetation Management Plan	1. LA County Fire Department, LACDPW 2. LA County Fire Department, LACDPW 3. Prior to Issuance of Building Permits	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.8	**AIR QUALITY**				
4.8-1	Develop and implement a construction management plan, as approved by the County, which includes the following measures recommended by the South Coast Air Quality Management District (SCAQMD), or equivalently effective measures approved by the SCAQMD: a. Configure construction parking to minimize traffic interference. b. Provide temporary traffic controls during all phases of construction activities to maintain traffic flow (e.g., flag person). c. Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the degree practicable. d. Re-route construction trucks away from congested streets. e. Consolidate truck deliveries when possible. f. Provide dedicated turn lanes for movement of construction trucks and equipment on and off site. g. Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications and per SCAQMD rules, to minimize exhaust emissions. h. Suspend use of all construction equipment operations during second stage smog alerts. Contact the SCAQMD at 800/242-4022 for daily forecasts. i. Use electricity from power poles rather than temporary diesel- or gasoline-powered generators.	Project Applicant	Plan Check	1. LA County Department of Regional Planning 2. LA County Department of Regional Planning 3. During Grading and Construction	

Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.8 AIR QUALITY (cont'd)				
4.8-1 (cont'd) j. Use methanol- or natural gas-powered mobile equipment and pile drivers instead of diesel if readily available at competitive prices.				
k. Use propane- or butane-powered on-site mobile equipment instead of gasoline if readily available at competitive prices.				
4.8-2 Develop and implement a dust control plan, as approved by the County, which includes the following measures recommended by the SCAQMD, or equivalently effective measures approved by the SCAQMD:	Project Applicant and Construction Contractor	Review and Approval of Fugitive Dust Control Plan and Field Inspection	1. AQMD 2. AQMD 3. Prior to Issuance of Grading Permit	
a. Apply approved non-toxic chemical soil stabilizers according to manufacturers' specification or other measures agreed to by the City to all inactive construction areas (previously graded areas inactive for four days or more).				
b. Replace ground cover in disturbed areas as quickly as possible.				
c. Enclose, cover, water twice daily, or apply approved soil binders to exposed piles (i.e., gravel, sand, dirt) according to manufacturers' specifications.				
d. Water active grading sites at least twice daily.				
e. Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.				
f. Provide temporary wind fencing consisting of 3- to 5-foot barriers with 50% or less porosity along the perimeter of sites that have been cleared or are being graded, if necessary.				

Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.8 AIR QUALITY (cont'd)				
4.8-2 (cont'd) g. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code.				
h. Sweep streets at the end of the day if visible soil material is carried over to adjacent roads (recommend water sweepers using reclaimed water if readily available).				
i. Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.				
j. Apply water three times daily or chemical soil stabilizers according to manufacturers' specifications to all unpaved parking or staging areas or unpaved road surfaces.				
k. Enforce traffic speed limits of 15 miles per hour or less on all unpaved roads.				
l. Pave construction roads when the specific roadway path would be utilized for 120 days or more.				
4.8-3 Painting contractors shall utilize low ROC content paints and solvents. The following SCAQMD website lists manufacturers who supply interior and exterior low or zero ROC paints: http://www.aqmd.Gov/business/brochures/zerovoc.htm.	Project Applicant		1. AQMD 2. AQMD 3. Prior to Issuance of Building Permits	

	Mitigation Measures/Conditions of Approval	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase	Status
4.9	**HYDROLOGY AND WATER QUALITY**				
4.9-1	Final drainage plans shall be prepared to ensure that no significant flooding would occur during or after site development. These plans shall be prepared to the satisfaction of the City of the Los Angeles County Department of Public Works.	Project Applicant	Approval of Drainage Plans and Field Verification	1. LACDPW, LACDFCD 2. LACDPW, LACDFCD 3. Prior to Issuance of Grading Permit	
4.9-2	Final grading plans shall be prepared to ensure that no significant erosion or sedimentation would occur during or after site development. These plans shall be prepared to the satisfaction of the Los Angeles County Department of Public Works.	Project Applicant	Review and Approval of Final Grading Plans and Field Verification	1. LACDPW, LACDFCD 2. LACDPW, LACDFCD 3. Prior to Issuance of Grading Permit	
4.9-3	The applicant shall satisfy all applicable requirements of the NPDES program in effect at the time of project construction to the satisfaction of the Los Angeles County Department of Public Works. These requirements include preparation of a Standard Urban Storm Water Mitigation Plan containing structural treatment and source control measures appropriate and applicable to the project.	Project Applicant	Review and Approval of Standard Urban Storm Water Mitigation Plan and Field Verification	1. LACDPW, LACDFCD 2. LACDPW, LACDFCD 3. Prior to Issuance of Grading Permit and During Life of Project	
	INTERIM SCHOOL The applicant shall prepare a vehicle trip-monitoring program to ensure that the Carpool/Bussing Program developed as part of the Interim School will adhere to the vehicle trip limits identified therein. The monitoring program shall include, at a minimum, the following: • Monthly traffic counts at entrance(s) and exit(s) of the school; • Unannounced "spot checks" on monthly basis noting trips counts and documentation of arrival and departure times; • Monetary penalties for non-compliance	Project Applicant	Field verification Review and Approval of monthly and annual reports	1. LACDPW 2. LACDPW 3. During Life of Project	

FINDINGS OF FACT AND REGARDING THE FINAL ENVIRONMENTAL IMPACT REPORT AND STATEMENT OF OVERRIDING CONSIDERATIONS FOR HESCHEL WEST SCHOOL
County Project No. 98-062
Conditional Use Permit No. 98-062

Section I
Introduction

The following findings of fact are based on the information contained in the Final Environmental Impact Report for the Heschel West School (the "Applicant") and additional facts found in the complete record of proceedings.

As defined by Section 15050 of the California Environmental Quality Act (CEQA) Guidelines (State CEQA Guidelines), the County of Los Angeles is serving as "Lead Agency" and is therefore responsible for preparing the EIR for the proposed project. In accordance with the requirements of the California Environmental Quality Act (CEQA), the County of Los Angeles conducted a preliminary review of the application for the proposed Heschel West School Project. As a result, a Notice of Preparation (NOP) was prepared and circulated by the County of Los Angeles in October 1998 for the required 30-day review period. The County's Initial Study was also circulated with this NOP to provide additional information on the project to public agencies and other parties reviewing the NOP.

The original Draft EIR was made available on October 28, 2002 through December 11, 2002 for a 45-day public review and comment period as mandated by CEQA. During the public review period, interested public agencies and private parties submitted written comments concerning the adequacy of the document to the County of Los Angeles, Department of Regional Planning.

Two public hearings, at which time public testimony was heard, were held before the Los Angeles County Regional Planning Commission (RPC) in March and May 2003 to consider the proposed project, the requested entitlements, and the adequacy of the original Draft EIR. At the conclusion of these public hearings, the RPC requested that issues raised by that testimony be addressed in a revised and recirculated EIR consistent with the procedural requirements of Section 15088.5 of the State CEQA Guidelines.

A Revised Draft EIR (RDEIR) was subsequently circulated in March 2005 for a 45-day public review and comment period.

The topics evaluated in the RDEIR were based on the County's initial study review of the project, considerations of responses to the NOP prepared for the proposed project, and the concerns raised in the 2003 public hearings. Given those considerations, the RDEIR considered the following environmental topics:

- Visual Resources
- Transportation and Access
- Noise
- Human Health
- Biological Resources
- Geotechnical Hazards
- Fire Services and Hazards
- Air Quality
- Hydrology and Water Quality

The RDEIR evaluated the environmental impacts of the proposed Heschel West School project and the related discretionary actions by the County of Los Angeles. As described in Section 2.0, Project Description, of the RDEIR, the Applicant requested a Conditional Use Permit (CUP) to authorize the phased construction, operation, and maintenance of a private preschool, elementary, and middle school (grades pre-K through 9) for up to 750 students in the A-1-5 Zone. The requested CUP would also authorize a grading permit to be issued for the amount of earthwork necessary to develop the property as proposed, consistent with the definition of a grading project under Section 22.08.070 of the Los Angeles County Planning and Zoning Code. Table 1 provides a summary of the Heschel West School proposed project building characteristics.

Table 1
Project Characteristics

Building Reference	Type of Use	Number of Stories	Size/ Floor Area
A	Auditorium	One Story	14,295 sq. ft.
B	Cafeteria/Multi-Purpose	One Story	14,410 sq. ft.
C	Library/Multi-Media/Administration	Two Story	16,320 sq. ft.
D	Classrooms	Two Story	35,730 sq. ft.
E	Sanctuary	One Story	8,000 sq. ft.
F	Gymnasium/PE Lockers	Two Story	26,095 sq. ft.
G	Classrooms	Two Story	32,680 sq. ft.
H	Library/Storage/Teacher Lounge	Two Story	11,470 sq. ft.
I	Preschool	One Story	7,450 sq. ft.
	Total Building Area		**166,450 sq. ft.**

Source: Jack Hollander & Associates, Inc., May 2003 and 2005 RDEIR.

The County of Los Angeles, serving as Lead Agency, prepared this RDEIR to serve as the environmental review document for Responsible Agencies, as defined by the State CEQA Guidelines. As described on page 2.0-1 of the RDEIR, Responsible Agencies for this project will likely include the South Coast Air Quality Management District (SCAQMD), United States Army Corps of Engineers (ACOE), California Department of Fish and Game (CDFG), Regional Water Quality Control Board (RWQCB), Caltrans, and the City of Agoura Hills.

Following the close of the public review period by the RPC on September 7, 2005, the County of Los Angeles prepared responses to all written and oral comments made during the public review period and during the three RPC Hearings (May 25, June 15, and September 7, 2005), consistent with the requirements of Section 15088 of the State CEQA Guidelines. Pursuant to Sections 15081 and 15132 of the State CEQA Guidelines, the County of Los Angeles prepared a Final EIR for the project consisting of the RDEIR, revisions to the RDEIR found in the Final EIR document, all comments received on the RDEIR, responses to those comments, and the mitigation monitoring and reporting program (hereinafter "2006 EIR").

On June 28, 2006, RPC unanimously approved the issuance of a CUP to authorize the construction and operation of a private school at the site, with a maximum of 750 students (the Project). The 2006 EIR certified by RPC found that two alternate mitigation measures, a roundabout and a five-way traffic signal, could fully mitigate the cumulative traffic impacts caused by the build-out of this school and other developments approved by the City of Agoura Hills and other jurisdictions in that region. The RPC's approval of the Project and certification of the 2006 EIR was appealed by the City of Agoura Hills, the Old Agoura Homeowners Association and the Applicant to the County Board of Supervisors (“the BOS”).

In the months following Project approval, Caltrans formally identified its requirements regarding the design, review and approval of the recommended traffic improvements that fall within its jurisdiction. Based on those requirements, the timing for construction of intersection improvements associated with the Project would take place beyond the desired occupancy date.

Given the circumstances, at the January 23, 2007 hearing before the BOS, the BOS directed preparation of an interim traffic plan option that would allow the school to begin operation with a student population of 390 students. There were no comments or new matters raised at the January 23, 2007 hearing that were not already covered in the responses to comments received on the RDEIR. No letters were received at or subsequent to the January 23, 2007 hearing.

Through the BOS’s January 23, 2007 resolution, incorporated herein by reference, the Applicant was instructed to work with staff and other interested parties and public agencies to perform the following:

1. Develop an interim traffic plan for a student body of no more than 390 students that fully mitigates all project-specific, tertiary, and cumulative traffic impacts, provides an enhanced, measurable, and

enforceable busing and/or carpooling program and includes an evaluation of alternative access routes including but not necessarily limited to one-way ingress at Canwood Street and one-way egress at Chesebro Road;

2. Perform any and all additional environmental assessment required by the California Environmental Quality Act and make the interim traffic plan and additional environmental documentation available for public review for a period of not less than 45 days and direct staff to prepare appropriate responses to comments and the final environmental documentation;

3. Prepare and recommend to this Board a modified grading concept to the Board that meets all County standards and includes a redesign of the Canwood Street entrance that more fully preserves the natural topography of the ridgeline;

4. Produce photometric and sight-line analyses, elevations, building renderings, and landscape plans, make these graphics available to interested members of the community, and prepare for recommendation to this Board a modified set of design and landscape standards that will preserve the semi-rural/equestrian character and existing architectural aesthetic of Old Agoura;

5. Create a preliminary emergency response planning checklist for inclusion in the conditions of the conditional use permit that ensures the future development and regular updating of a comprehensive emergency response and evacuation plan that will establish clear lines of communication between parents, school officials, community members and emergency responders and ensure that the school's operations do not interfere with an orderly evacuation of the surrounding community should one become necessary;

6. Improve the school's noise attenuation plan and recommend changes to the permit conditions that eliminate wherever possible potentially disruptive noises. Including but not limited to loudspeakers, school bells and other amplified devices;

7. Work with the City of Agoura Hills to develop a set of standard minimum conditions for any temporary use permits approved for this site;

8. Work with the appropriate conservation and public park agencies to secure final documentation verifying the respective agency's willingness to receive the deed restricted conservation easement and land dedication that are shown on the approved Exhibit A and submit this documentation to the Board prior to May 22, 2007; and

9. Immediately repair and continually maintain all exterior fencing on the property so as to prevent trespassing and perform this work in a manner that preserves the existing character of the Old Agoura community.

The Applicant has worked with staff and other interested parties and public agencies and completed the tasks as outlined in the Board of Supervisor's January 23, 2007 resolution.

Pursuant to the Board of Supervisor's January 23, 2007 resolution, a carpool/busing plan and Supplemental Environmental Analysis (SEA) was prepared to consider operation of this school under the interim traffic plan condition. The carpool/busing plan and SEA was made available on October 1, 2007 through November 14, 2007 for a 45-day public review and comment period in accordance with the Board of Supervisor's motion. Responses to comments on environmental issues raised on the SEA were prepared in accordance with Section 15088.5(f)(1) of the State CEQA Guidelines and circulated on November 16 through November 26, 2007. The 2006 EIR, the Supplemental Environmental Analysis, and a revised Mitigation Monitoring Program are collectively referred to as the Final EIR.

Section II

Summary of Findings Regarding the Potentially Significant Environmental Effects of the Proposed Project

A. <u>Environmental Effects Found to be Less than Significant</u>

1. Human Health

Facts in Support of Findings

The EIR fully evaluated potential impacts related to human health on pages 4.4-1 through 4.4-21. This section of the EIR addresses potential impact related to the Calabasas Landfill and its proximity to the proposed site for the Heschel West School.

The Heschel West School project site is located approximately 0.75 mile southwest of the Calabasas Landfill. The County of Los Angeles has issued Conditional Use Permit No. 5022-5 for operation of the landfill. The Calabasas Landfill complies with all federal, state, and local regulations governing the operations of landfills.

Federal regulations regarding solid waste include the Resource Conservation and Recovery Act of 1976 (RCRA), the Solid Waste Disposal Amendments of 1980, and the Hazardous and Solid Waste Amendment of 1984. Federal regulations regarding water quality include Part 258 of Title 40, Code of Federal Regulations and the Clean Water Act. State regulations covering water quality requirements for landfills are contained in Division 2 of Title 27, California Code of Regulations. Regulations pertaining to public health and safety include those governing handling of hazardous waste, landfill gas migration, vector control, and site security are found in Sections 20870, 29019.5, 20810, and 20530 of Title 27, California Code of Regulations. The Los Angeles County Department of Health Services, which is the Local Enforcement Agency (LEA) for the California Integrated Waste Management Board, oversees Solid Waste Facilities Permit No. 19-AA-0056.

These permits regulate all aspects of landfill operation and closure including: design of the facility, the nature and type of waste accepted, the amount of waste accepted, the type of cover material applied to the landfill cells and when it is applied, the configuration of landfill cells (i.e., height, width, compaction) water quality and air quality monitoring. For example, a drainage network has been implemented at the landfill to control runoff and prevent ponding on the landfill deck. This will reduce the amount of water that percolates into the landfill and the amount of storm water runoff from entering Chesebro Creek. It is highly unlikely that construction workers, students, or faculty of the proposed school would be exposed to contaminants contained in surface water at any appreciable level. This is based on the fact that no uses are proposed near the creek, the limited periods of time when surface water flow occurs in the unnamed drainage, and the small contribution of this flow relative to the overall volume of runoff that enters into Chesebro Creek from the larger watershed. Additionally, the subwatershed of the project site is disjunct from that of the landfill providing a physical and elevational separation. (*See,* for example, RDEIR pages 4.4-11 through 4.4-18.)

Groundwater protection measures are also implemented at the landfill to prevent leachate from polluting the groundwater table. A subsurface barrier system was constructed to prevent contaminants from percolating below the landfill. The subsurface barrier system also includes extraction wells and groundwater monitoring wells. There are also seven liner systems at the landfill to impede the migration of groundwater off the landfill site. While not all portions of the landfill are constructed with the liner system, all future areas of the landfill will be excavated prior to refuse placement to construct a liner system. The County Sanitation Districts compares down-gradient water quality to historic background water quality to assess any changes in groundwater quality conditions. Future samples will also be compared to the data on file to determine if the landfill is affecting groundwater quality. Although groundwater monitoring has detected contaminants in local groundwater down gradient of barriers #2 and #5, the project site is sufficiently far away from the landfill to avoid contamination. Moreover, the detected levels have shown a statistically significant decreasing or neutral trend in concentrations down-gradient of the landfill, which indicates natural attenuation is occurring. Students and faculty would not be exposed to contaminants because the drinking and irrigation water used on site would be supplied by the Las Virgenes Municipal Water District.

Correspondence from the Sanitation Districts of Los Angeles County (dated August 20, 2002) indicates that the Calabasas Landfill has never accepted non-regulated nuclear waste from Rocketdyne labs and the landfill is not permitted to receive any radioactive waste. The landfill has operated detectors at each weigh scale since 1983 to detect the presence of radioactive materials and ensure such waste is not accepted. Furthermore, the presence of soil serves as a barrier to alpha and beta particles emitted by naturally decaying isotopes. Consequently, students and

faculty members would not be subject to a significant health risk as a result of exposure to any naturally occurring radionuclide that might be present in groundwater in the vicinity of the property. In the event dewatering is necessary during construction of Phase 1, the Applicant would obtain a separate National Pollutant Discharge Elimination System (NPDES) Permit for groundwater discharge from the Regional Water Quality Control Board (RWQCB). Conditions on the permit include water quality sampling and appropriate means of treatment, if necessary.

The ambient air quality around the landfill site is within the background ranges experienced in the South Coast Air Basin. This suggests that the landfill is not directly affecting air quality in the area. The flare station and microturbines on the landfill are designed to operate and meet all pertinent air quality regulations established by the South Coast Air Quality Management District (SCAQMD) and testing of the flare station indicates that this facility is operating within the permit limits. To control dust resulting from landfill activities, the Sanitation Districts have prepared a dust emissions plan approved by the SCAQMD. Dust is minimized through the continuous use of water trucks and the construction of barriers near active landfill cells and revegetation is also used on areas of the landfill that are no longer active.

The evaluation of human health risk associated with the proximity of the project site to the Calabasas Landfill, and not associated with air quality, is a site-specific issue that is not influenced by other development projects. As such, there are no cumulative impacts to human health.

Findings

The Regional Planning Commission finds that the project will not have a significant adverse impact on human health.

The project site is approximately 0.75 mile from the Calabasas Landfill. The landfill design contains a variety of physical measures that limit potential environmental effects associated with operation of this facility, including surface water controls, groundwater protection mechanisms, landfill gas collection systems, and fugitive dust management programs. These systems have proven effective in limiting the risks to human health and the environment associated with operation of this facility. Due to the presence of these mechanisms and the distance of the project site from this facility, no significant human health risk is anticipated.

The risk assessment prepared by the Sanitation Districts of Los Angeles County (dated August 2005) evaluated potential risks to both human and ecologic receptors from groundwater contamination, including contamination that may volatilize to the soil and/or air from landfill operation. The preliminary findings of this risk assessment indicate that there are no risks to human health or the environment in the study area.

B. <u>Environmental Effects Discussed in the EIR Which Can Be Avoided or Substantially Lessened to Less Than Significant Levels</u>

2. Traffic and Access

Facts in Support of Findings

An evaluation of the traffic impacts of the proposed project is found on pages 4.2-1 through 4.2-48 of the EIR. The comprehensive traffic impact analysis completed for the project is found in Appendix 4.2 of the EIR. The methodologies used in this study for the analysis and evaluation of traffic operations at each study intersection are based on Traffic Impact Analysis Report Guidelines issued by the Los Angeles County Department of Public Works dated January 1997. Using the Critical Movement Analysis (CMA) methodology and other methodologies, the analysis incorporated a detailed evaluation of traffic conditions at five intersections in terms of Level of Service (LOS).

The uses associated with the proposed Heschel West School would generate approximately 2,638 daily trips, of which 720 would occur in the A.M. peak hour, 508 would occur in the school P.M. peak hour, and 79 would occur during the normal P.M. peak hour. This level of trip generation is expected to significantly impact three of the study

intersections during one or more of the peak periods under consideration, prior to mitigation. These intersections are as follows: (1) Canwood Street and Chesebro Road at Driver Avenue and Palo Comado Canyon Road; (2) Palo Comado Canyon Road at U.S. 101 westbound ramps; and (3) Chesebro Road and U.S. 101 eastbound ramps at Dorothy Drive. No significant impacts are anticipated to occur on any of the nearby neighborhood streets or to any of the Los Angeles County Congestion Management Program (CMP) monitoring intersections or freeway segments. In addition, no roadway segment impacts will occur as a result of the project. With implementation of recommended mitigation measures, all project-related impacts will be reduced to less than significant levels.

Introduction of traffic generated by cumulative development in the project vicinity will result in significant impacts at all five of the studied locations prior to mitigation. These intersections are as follows: (1) Canwood Street and Chesebro Road at Driver Avenue and Palo Comado Canyon Road; (2) Palo Comado Canyon Road at U.S. 101 westbound ramps; (3) Chesebro Road and U.S. 101 eastbound ramps at Dorothy Drive; (4) Chesebro Road and Palo Comado Canyon Road at Chesebro Road; and (5) Chesebro Road and Laura La Plante Drive at Agoura Road. These significant cumulative impacts can be mitigated to less than significant levels through implementation of the recommended improvements, funded in part by the Applicant's payment of a "fair share" contribution towards the cost of additional long-term intersection and freeway ramp improvements, some of which are currently proposed by the City of Agoura Hills. (*See* RDEIR page 4.2-46, referencing the EIR prepared in connection with the City of Agoura Hills General Plan Update.)

The "fair share" payment for mitigation of project contributions to cumulative traffic impacts at area intersections will be determined through a cooperative effort between the County Department of Public Works and City of Agoura Hills. Payment of the agreed-upon fees will be made to the City of Agoura Hills as required by Condition 22 of Conditional Use Permit No. 98-062-(3). The school must also install various traffic mitigation measures at the school's sole expense.

While most of the study intersections are under the jurisdiction of the City of Agoura Hills, the intersection of Palo Comado Canyon Road/U.S. 101 northbound ramps/Canwood Street is under the jurisdiction of the California Department of Transportation (Caltrans). While the City of Agoura Hills and the County of Los Angeles Department of Public Works will be consulted during the final design process for any intersection improvements approved for this location, Caltrans has the ultimate authority with regard to design and implementation of such improvements. Condition 30a of Conditional Use Permit No. 98-062-(3) provides for the City of Agoura Hills participation in the approval process for the improvements at this location.

The school would also schedule weekend special events that could draw as many as 1,500 persons. A weekend special event analysis indicates that these events could result in a total of approximately 600 vehicles arriving or departing the project site. This could create significant impacts on Saturdays at the project access location of Palo Comado Canyon Road and the westbound U.S. 101 ramps/Canwood Street under the "arrival" traffic scenario, and significant impacts on Saturdays and Sundays for the "departure" traffic scenario. However, the magnitudes of these weekend impacts are substantially less than the magnitudes of typical weekday peak-hour impacts. Moreover, Conditions 30k through n of Conditional Use Permit No. 98-062-(3) place restrictions on the number and timing of special events. Included is a requirement to prepare a special event management plan and obtain a Temporary Use Permit when an event is predicted to generate the need for more than the 400 parking spaces that will be available on the project site. These requirements are intended to mitigate circulation and parking management issues associated with special events.

Additional facts to support the findings below are found in the record of proceedings for the project.

Findings

Pursuant to Public Resources Code Section 21081(a)(1) and State CEQA *Guidelines* Section 15091, the Regional Planning Commission finds that the project's incorporation of the following mitigation measures, which are discussed in the RDEIR at pages 4.2-34 through 4.2-36, and 4.2-44 through 4.2-46, will avoid or reduce the transportation and circulation impacts to a less than significant level.

Canwood Street and Chesebro Road at Driver Avenue and Palo Comado Canyon Road (Project-Specific Impacts)

4.2-1 This unsignalized intersection currently meets the County's warrant for traffic signal installation, indicating that a traffic signal is necessary at this location to accommodate existing traffic volumes. Therefore, the project should contribute its fair share toward installation of a signal. However, the intersection is under the jurisdiction of the City of Agoura Hills. Should the City of Agoura Hills determine that a traffic signal is unacceptable, the following alternative "non-signalized" improvement is recommended:

- Improve the eastbound and westbound approaches of this intersection (Driver Avenue, and Palo Comado Canyon Road, respectively) to install an exclusive left-turn lane, in addition to a shared through/right-turn lane, in both directions. Some minor roadway widening on both approaches within the existing rights-of-way will be required in order to implement this improvement. The intersection will remain four-way stop-sign controlled.

- To monitor the timing of implementation, the Applicant shall prepare annual enrollment reports for submittal to the Los Angeles County Department of Public Works. This mitigation measure shall be implemented before enrollment reaches 660 day school students and 20 percent of the total preschool enrollment.

Palo Comado Canyon Road at US 101 Westbound Ramps (Project-Specific Impacts)

4.2-2 Two alternative improvements were proposed for this location. Either of these recommended improvements could mitigate the project specific impacts anticipated from the establishment of the school. The mitigation measure for this intersection impact shall be implemented prior to initial occupancy of the school, and will provide appropriate traffic control for the intersection, and will accommodate the new project's Canwood Street access location as part of a revised intersection configuration.

(a) Roundabout – Reconfigure the intersection, including all approaches, to install a new traffic roundabout, more commonly known as a "traffic circle." As proposed, the recommended roundabout design would include an inner circle with a radius of approximately 50 feet and a single travel lane around the circle. The roundabout would control all approaches to this intersection, including both the northbound and southbound Palo Comado Canyon Road approaches, the westbound US 101 on/off ramps, and the Canwood Street approach. It is possible that some or all of these approaches would be "flared" to provide two storage lanes, and the minor approach from Canwood Street may also be "yield" sign controlled. The final design of the roundabout shall be reviewed and approved by Caltrans and the County Department of Public Works, and may require rights-of-way in excess of that currently available.

(b) Traffic Signal – Reconfigure the intersection to include the Canwood Street approach as part of an overall intersection geometry, and install a new traffic signal at this intersection. Re-stripe the westbound Canwood Street approach to provide one shared left-turn/through lane and one exclusive right-turn lane. The southbound approach of Palo Comado Canyon Road would be re-striped to provide one left-turn lane (to Canwood Street), one through lane, and one right-turn only lane. Widen and re-stripe the westbound US 101 off ramp to provide an additional right-turn only lane, to accommodate the project traffic U-turn movement directly onto Canwood Street.

The traffic signal will operate on a three-phase cycle, with the westbound approaches of the westbound US 101 off ramp and Canwood Street having separate phases. Special traffic signal heads will be installed to prevent confusion to drivers entering the intersection, and signal timing and phasing will be designed to prevent vehicles from becoming "trapped" within the intersection.

The "roundabout" alternative was suggested by Caltrans during preliminary reviews of the initial traffic study. Caltrans has recently been exploring the roundabout interchange design, and has installed roundabouts at several freeway ramp/surface street intersections throughout the State. Although the original "traffic signal" mitigation proposal was found feasible by Caltrans, the characteristics of this intersection prompted Caltrans to request analysis of a roundabout design.

The decision regarding the appropriate mitigation alternative to be installed at the Palo Comado and US-101 ramp/Canwood Street location ultimately rests with Caltrans. The Regional Planning Commission has rejected the traffic signal on testimony from the City of Agoura Hills. Although Canwood Street is within the City of Agoura Hills, Caltrans has jurisdiction over the intersection pursuant to access-control provisions of its freeway agreement with the City. However, Caltrans will not make a final decision without the direct input from the City of Agoura Hills. Current discussions with Caltrans indicate that the roundabout designs for the intersection mitigation could fully address the project's impacts and could be feasibly constructed within existing rights of way. However, it is Caltrans policy that no decision will be rendered until the project requiring the mitigation measure has been approved and an application for an encroachment permit to construct the proposed mitigation has been filed. At that time, Caltrans will conduct the necessary engineering studies to determine what intersection design to install.

Chesebro Road and US 101 Eastbound Ramps at Dorothy Drive (Project-Specific Impacts)

4.2-3 This unsignalized intersection currently meets the County's warrant for traffic signal installation, indicating that a traffic signal is necessary at this location to accommodate existing traffic volumes. Therefore, the project shall contribute its fair share toward installation of a signal. However, if a traffic signal is found to unacceptable by the City of Agoura Hills, the following alternative "non-signalized" improvement is recommended:

- Re-stripe the northbound approach of this intersection to provide one shared left-turn/through lane, and one shared through/right-turn lane. Re-stripe the US 101 on ramp to provide two receiving lanes. The right lane of the on ramp should be striped as a "drop lane," which merges with the left lane.

  To monitor the timing of implementation, the Applicant shall prepare annual enrollment reports for submittal to the Los Angeles County Department of Public Works. This mitigation measure shall be implemented before enrollment reaches 80 percent of the proposed total (approximately 531 of the 660 day school students).

Palo Comado Canyon Road Improvements (Project-Specific and Cumulative Impacts)

4.2-4 Prior to initial occupancy of the school, Palo Comado Canyon Road shall be improved along the west side to complete a 32-foot half roadway from Canwood Street/Chesebro Road to the westbound US 101 on-ramp.

Chesebro Road Overpass (Cumulative Impacts)

4.2-5 At the time a fee district for roadway improvements is established within the North Area Plan, the project Applicant shall contribute a "fair share" amount, as determined by the fee structure established for the district, to fund widening of the Chesebro Road overpass and reconfiguration of the Kanan Road interchange consistent with the proposed circulation improvements identified in the Santa Monica Mountains North Area Plan.

Canwood Street and Chesebro Road at Driver Avenue and Palo Comado Canyon Road (Cumulative Impacts)

4.2-6 In addition to the traffic signal improvements described previously to address project-specific impacts, re-stripe the eastbound approach of this intersection (Driver Avenue) to install an exclusive left-turn lane, in addition to a shared through/right-turn lane, and restripe the southbound approach of the intersection (Chesebro Road) to provide an exclusive left-turn lane plus a shared through/right-turn lane. Some minor roadway widening within the existing right-of-way will be required in order to implement this improvement.

However, if the traffic signal is not acceptable, the following "non-signalized" improvement is recommended:

In addition to the installation of the eastbound left-turn lane to address project specific mitigation, further improve the eastbound approach of this intersection (Driver Avenue) to install an additional through lane, for a final approach configuration of one exclusive left-turn lane, one through lane, and one shared through/right-turn lane. It is likely that additional rights-of-way will be needed in order to accommodate the roadway widening necessary to implement this cumulative improvement, in which case the project would have to pay its "fair share" toward the cost (if any) of acquiring such rights-of-way. The intersection would retain the existing four-way, STOP-sign control.

Palo Comado Canyon Road at US 101 Westbound Ramps (Cumulative Impacts)

4.2-7 No additional improvements at this location are necessary under the “roundabout” alternative, as the proposed measure will be adequate to reduce cumulative impacts at this intersection to less than significant levels. However, if the traffic signal alternative is selected instead, an additional through lane should be installed for both the northbound and southbound approaches, in addition to a new northbound left-turn lane. The traffic signal alternative would result in a final intersection configuration of one left-turn lane, one through lane, and one shared through/right-turn lane for northbound traffic, and one left-turn lane, two through lanes, and one right-turn lane for the southbound approach. The traffic signal alternative would also require the existing two-lane bridge crossing the US 101 to be widened, and the project would be required to contribute a "fair share" of the costs associated with this alternative improvement.

Chesebro Road and US 101 Eastbound Ramps at Dorothy Drive (Cumulative Impacts)

4.2-8 No additional improvements beyond the recommended project-specific improvement measure are necessary to address cumulative impacts, whether the traffic signal or “non-signalized” improvement is selected.

Chesebro Road and Palo Comado Canyon Road at Chesebro Road (Cumulative Impacts)

4.2-9 Pay a "fair share" of the costs associated with installing a traffic signal at this location, which is forecast to meet warrants under future 2010 ambient growth conditions. However, if a traffic signal is not acceptable, pay a "fair share" of the costs associated with the following measures: a) re-striping the intersection to provide one left-turn lane and one right-turn lane for the eastbound (Chesebro Road) approach; b) re-striping northbound Palo Comado Canyon Road to add an exclusive left-turn lane in addition to a single through lane; and c) re-striping the westbound direction of Chesebro Road west of Palo Comado Canyon Road to provide two “receiving” lanes (one each for the new northbound left-turn lane and for the existing southbound right-turn lane from Palo Comado Canyon Road).

Chesebro Road and Laura La Plante Drive at Agoura Road (Cumulative Impacts)

4.2-10 Pay a "fair share" of the costs associated with installing a traffic signal at this location, which is forecast to meet warrants under future 2010 ambient growth conditions. If a traffic signal is not acceptable, pay a "fair share" of the costs associated with re-striping this intersection to provide a left-turn only lane and one shared through/right-turn only lane for the eastbound approach, one shared left-turn/through lane plus a right-turn lane on the westbound approach, and one left-turn lane and one shared through/right-turn lane for the southbound approach.

3. Noise

Facts in Support of Findings

An evaluation of the potential noise impacts associated with this project is found on pages 4.3-1 through 4.3-26 of the EIR.

The proposed project would generate noise during both construction and operation. Noise levels generated during the construction stages would be temporary and would primarily affect adjacent sensitive uses. All construction activity must comply with construction noise restrictions imposed by Section 12.08 of the County Code. Project compliance with these Code provisions, along with implementation of mitigation measures outlined in the EIR, would reduce construction noise impacts to less than significant levels.

On an operational basis, roadway noise generated by project traffic is predicted to increase by approximately 0.5 dB(A). Noise generated by on-site activity such as children playing or school bells would be well below the requirements of the Los Angeles County Noise Ordinance for daytime conditions. Besides evening educational activities, nighttime events would consist of graduation night, or similar periodic events. No nighttime athletic events would occur, and restrictions on the use of bells or amplified sounds are provided in the EIR as mitigation. Consequently, project operation would not result in a significant point-source noise impact to adjacent land uses.

Finally, the EIR evaluated the cumulative impact of the project based on methodology outlined on RDEIR page 4.3-1 of the EIR, and the acoustical analysis contained in Appendix 4.3. As stated therein, the cumulative analysis is based upon either a list of past, present, and probable future projects or a summary of projections contained in the County's *General Plan*. Development of the proposed project would not audibly increase noise levels along affected roadway segments. Consequently, the project would not contribute to any future increase in noise levels that may occur as a result of cumulative development. As such the noise level increase along studied roadway segments would not generate a significant cumulative impact. An approximation of the combined effect of stationary and point source project specific noise on a nearby receptor would exceed 45 dB(A) L_{eq} no longer than 30 minutes within any one-hour period. Consequently, no significant cumulative noise impacts are anticipated with school operation.

Additional facts to support the findings below are found in the record of proceedings for the project.

Findings

Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091, the Regional Planning Commission finds that the project's incorporation of the following mitigation measures, which are discussed in the EIR, will avoid or reduce impacts related to noise conditions to a less than significant level.

4.3-1 All construction activity occurring on the project site shall adhere to the requirements of the County of Los Angeles Construction Equipment Noise Standards, , as set forth in Section 12.08.440 of the County Code, and as identified in **Table 4.3-3** of the EIR.

4.3-2 All construction equipment, fixed or mobile, shall be in proper operating condition and fitted with factory standard silencing features, including the muffling and shielding of intakes and exhausts.

4.3-3 All construction truck traffic shall avoid residential areas and other sensitive receptors to the extent feasible.

4.3-4 Construction equipment shall be turned off when not in direct use.

4.3-5 Sound blankets shall be used on all construction equipment for which use of sound blankets is technically feasible.

4.3-6 Portable acoustical barriers shall be placed along the project site's common boundary with adjacent residential uses during grading activity associated with Phase I and II of campus construction.

4.3-7 All stationary and point sources of noise (e.g., bells amplified sound, etc.) occurring on the project site shall adhere to the requirements of the County of Los Angeles Ordinance No. 11743, Section 12.08.390 as identified in **Table 4.3-2** of the EIR**, County of Los Angeles Exterior Noise Standards for Stationary and Point Noise Sources**.

4.3-8 No amplified sound shall be generated between the hours of 8:00 P.M. and 8:00 A.M. All school bells shall be oriented away from adjacent residential areas.

4. Geotechnical Hazards

Facts in Support of Findings

The EIR fully evaluated potential impact related to geotechnical hazards on pages 4.6-1 through 4.6-16. This section of the EIR addresses potential impacts related to the condition of on-site soils and the geology of the area in relation to potential seismic events. The proposed project would result in the construction and occupancy of school children and faculty, and therefore has the inherent potential to subject persons to ground shaking-related hazards. By incorporating recommendations of the geotechnical engineering study and complying with the Uniform Building code (UBC) and County of Los Angeles Building Standards, project impacts related to seismic hazards would be less than significant.

Finally, the EIR evaluated the cumulative impact of the project based on methodology outlined on pages 4.0-1 through 4.0-2. As stated therein, the cumulative analysis is based upon a list of past, present, and probable future projects. Geotechnical and soil resources are site-specific conditions that are not cumulative in nature. Because the development of each site in the project area within the County would have to be consistent with applicable County of Los Angeles requirements and the adopted Uniform Building Code as it pertains to protection against known geologic hazards, geological impacts of cumulative development would be less than significant.

Additional facts to support the finding below are found in the record of proceedings for the project.

Findings

Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091, the Regional Planning Commission finds that the project's incorporation of the following mitigation measures, which are discussed in the EIR, will avoid or reduce impacts related to soils and geologic conditions to a less than significant level.

General

4.6-1 The project design and construction shall incorporate and implement all of the recommendations in the Gorian geotechnical investigation dated May 1999, and all geotechnical recommendations developed as part of more detailed project design.

Grading-Related Impacts

4.6-2 All aspects of grading, including site preparation, grading, and fill placement, shall conform with relevant provisions of the County of Los Angeles Building Code.

4.6-3 Cut slopes may be constructed at a maximum gradient of 2:1. All cut slopes or backcuts for retaining walls must be observed by the project geotechnical consultant to verify absence of adverse geologic conditions. Where topsoil is present at the top of a cut slope, the top of the slope shall be "laid back" or rounded.

4.6-4 Fill slopes may be constructed at a maximum gradient of 2:1. Fill slopes shall be keyed and benched into firm in-place soil or bedrock. Fill slope keyways shall be a minimum of 15 feet wide and cut to a minimum depth of 2 feet at the toe into competent in-place materials. The keyway shall be tilted into the slope and shall be at least 3 feet deep at the heel (measured from below the slope toe elevation). The keyway shall be observed by the project geotechnical consultant prior to placing any fill.

4.6-5 All slopes shall be maintained so as to reduce the risk of erosion and degradation with time due to natural or man-made conditions. In particular, burrowing animals shall be controlled and brow ditches, drainage structures, and the slope vegetation shall be maintained in good condition.

4.6-6 All graded or exposed natural slopes shall be maintained with dense, deep rooting (minimum 2 feet deep), drought-resistant ground cover and shrubs or trees. A reliable irrigation system shall be installed on the slopes where necessary, adjusted so over-watering does not occur, and periodically checked for leakage. Care shall be taken to maintain a uniform, optimum moisture content in the slopes, and to avoid over drying, or excess irrigation. Excess watering of slopes shall be avoided to reduce the risk of erosion and surficial failures. Slopes shall not be watered before forecasted rain.

4.6-7 All drainage structures shall be kept in good condition and clean the entire length to the outlet. Final grading of the site shall provide positive drainage away from slopes, and water shall not be allowed to pond or gather in a slope area. Burrowing animals, particularly ground squirrels, can destroy slopes; therefore, where present, immediate measures shall be taken to evict them.

Differential Fill and Settlement/Landslides

4.6-8 On-site materials obtained from excavations may be used as fill soils. Fill soils shall be free of all deleterious materials including trash, debris, organic matter, and rocks larger than 6 inches. Fill soils shall be placed in thin uniform lifts not exceeding 10 inches of uncompacted thickness, brought to 2 percent over the optimum moisture content, and compacted to a minimum of 90 percent relative compaction. The need for import fill is not anticipated. However, if needed, sources of import fill shall be approved by the project geotechnical consultant prior to transport of materials to the site.

4.6-9 Remedial grading in the form of removals and recompaction is recommended to prepare all building pad areas and those locations where cut slopes are required near a landslide. Within areas of settlement sensitive structures and 5 feet beyond, removal operations must remove any highly compressible upper native soils. Where fill thickness varies significantly or a transition condition exists under a structure, additional removals as recommended in the Gorian geotechnical investigation shall be performed to reduce the potential for differential movement.

Seismic Hazards

4.6-10 Structures built as part of the project shall be designed in accordance with the seismic design factors in the latest version of the Uniform Building Code.

Expansive Soils

4.6-11 Expansion tests shall be performed at the finish grade upon conclusion of grading for each building pad area.

4.6-12 Positive drainage shall be consistently provided and maintained away from all structures. Drainage shall not be changed creating an adverse drainage condition.

4.6-13 Landscape watering shall be held to a minimum. Sprinkler systems shall be maintained and plumbing leaks shall be immediately repaired so the subgrade soils underlying or adjacent to the structures do not become saturated. Trees shall be spaced so that roots will not extend under foundations or slabs.

4.6-14 Water shall not be allowed to pond or accumulate around the any pool decking (which could otherwise allow water migration into the subgrade). All pool hardware fittings shall be adequately water tight, and caulking shall be maintained between hardscape joints.

4.6-15 Information regarding the care and maintenance of improvements located on expansive soils shall be passed on to any future owners of the property.

5. Fire Services and Hazards

Facts in Support of Findings

An evaluation of the Project's potential impacts on fire protection services is found on pages 4.7-1 through 4.7-23 of the EIR.

The County of Los Angeles Fire Department will be responsible for fire protection and emergency medical service to the project area. Adherence to applicable codes and requirements during construction would reduce the potential for fire hazards at the site during construction to below the threshold of significance. The potential for interference with emergency vehicles traveling through the area is considered small given the periodic and short-term nature of any construction-related traffic resulting from the development, and with the implementation of the required construction management plan. No significant impacts are expected with the use of flagmen and other standard construction traffic practices.

The site is located within an existing service area and the Department estimates the response time to the project at four minutes (for primary response). This equals the National Fire Protection Association (NFPA) Standard No. 1710's goal in response to a primary call for service. Paramedics should arrive within eight minutes per NFPA 1710. Based on the above, and with payment of the developer fee required as part of the Los Angeles County Fire Department Development Fee Program, the potential for impact on response times is considered to be less than significant.

The project is within a Very High Fire Hazard Severity Zone (VHFHSZ) under the requirements of California Government Code Section 51178. Because of the school's location, the Applicant will prepare a fuel modification plan, landscape plan, and irrigation plan. The Fire/Vegetation Management Plan for the project was developed based upon the findings of a computer model used by the U.S. Forest Service to predict the rate of spread and direction of fire within the project area. This plan was developed to create a defensible space that would prevent a wildfire from burning the campus.

The Applicant is also required to prepare an emergency plan that will outline procedures and responsibilities to ensure a safe and orderly response in the event of adequate warning of a fire or other emergency. Strategies for avoiding traffic congestion in an evacuation scenario will be included in the Emergency Plan. Protocols given to parents and training sessions will outline and emphasize safe and orderly entrance and exit strategies. Parents will be encouraged to use the Canwood Street access to the freeway and to avoid traveling through the intersection of Driver Avenue, Chesebro Road, Canwood Street, and Palo Comado Canyon Road.

In the event there is inadequate warning of a fire, the project incorporates a shelter-in-place facility constructed using two-hour fire-rated exterior walls from foundation to roof, and sized to house all students and staff at a minimum ratio of 7 square feet per occupant. This facility will provide enough breathing air for the expected occupant load for two hours. The shelter-in-place procedure is the preferred protective action when there is inadequate time to evacuate. Based on the above, and with implementation of the fuel modification plans and compliance with applicable requirements for construction, access, water mains, fire hydrants, fire flows, brush clearance and fuel modification plans, no significant impacts are anticipated.

The school's internal road structure would also provide an alternative evacuation route for residents up Chesebro Canyon, alleviating congestion at the intersection of Driver Avenue, Chesebro Road, Canwood Street, and Palo Comado Canyon Road. In addition to emergency access, the school's vegetation management, fire-retardant construction and separation from the intense flames and heat of the fire will create a wildland buffer that serves as a refuge for fleeing residents as well as a protective buffer between the wildland areas and adjacent residents. The school itself, with large open areas, can readily serve as a fire equipment staging area. Therefore, the Proposed Project could provide beneficial community impacts in case of an emergency.

Finally, the EIR evaluated the cumulative impact of the project based on methodology outlined on pages 4.0-1 through 4.0-2 of the EIR. As stated therein, the cumulative analysis is based upon either a list of past, present, and probable future projects or a summary of projections contained in the County's *General Plan*. Build-out of the land uses allowed by the *General Plan*, including the related projects known at this time, will increase demands on fire protection services. Continued implementation of the County Fire Department's proactive fire fighting plans and policies would ensure the continued ability of the Department to meet the cumulative demand for fire and emergency services and meet recommended national fire protection service standards. No significant cumulative impacts will result.

Findings

Pursuant to Public Resources Code Section 21081(a)(1) and State CEQA *Guidelines* Section 15091, the Regional Planning Commission finds that the project's adherence to the following mitigation measures from the EIR, which are incorporated into the project, will avoid or reduce the fire protection service impacts to a less than significant level.

4.7-1 Concurrent with the issuance of building permits, the Applicant shall pay the Los Angeles County Fire Department Developer Fee in effect at that time based on actual building area.

4.7-2 The site plan for the proposed project shall provide sufficient capacity for fire flows of 5,000 gpm at 20 psi residual pressure for a five-hour duration for educational units and uses with a floor plan in excess of 35,000 square feet, or such other fire flow required by the County Fire Department.

4.7-3 Prior to framing, access, hydrants, and water supply shall be provided to comply with Section 902 of the Fire Code, which requires all-weather access.

4.7-4 Vehicular access must be provided and maintained serviceable to all required fire hydrants throughout construction.

4.7-5 Prior to issuance of occupancy permits, the development shall comply with County Building and Safety Code and Fire Code requirements associated with the provision of adequate site vehicular access (County Fire Code 10.207), and fire prevention and suppression.

4.7-6 Prior to issuance of building permits, the project shall satisfy all conditions of approval for vehicular and Fire Department access.

4.7-7 The Applicant shall install Fire Department-approved street signs and building numbers prior to issuance of occupancy permits.

4.7-8 The Fire/Vegetation Management Plan prepared for the project shall be reviewed and approved by the Fire Department prior to issuance of building permits.

6. Air Quality

Facts in Support of Findings

An evaluation of the potential air quality impacts of the proposed Project is found on pages 4.8-1 through 4.8-31 of the EIR.

The project would generate both construction-related and operation-related pollutant emissions. Construction-related emissions would be generated by on-site stationary sources, heavy-duty construction vehicles, construction worker vehicles, and energy use. Operation-related emissions would be generated by on-site and off-site stationary sources and by mobile sources. The project is expected to be constructed in several phases within a 12-year time span. Grading and earthwork activities for the entire project would be undertaken during the first two phases of the project, with approximately 72 percent occurring in the first phase. Construction activity during Phase I would not generate emissions that exceed South Coast Air Quality Management District's (SCAQMD's) thresholds of significance, since the project would be subject to SCAQMD Rule 403 – Fugitive Dust. Further, combined construction and operational emissions resulting from operation of initial phases of the project, and construction of latter phases would not exceed SCAQMD's thresholds of significance. Operation of the proposed school would not generate a volume of air emissions that exceed the thresholds of significance and so would not result in significant air quality impacts.

Modeling was also used to determine if traffic generated by the project would result in significant increases in carbon monoxide levels at five intersections that will likely be impacted by the project. The analysis concluded that CO levels should be well below the stringent state standards. Thus, vehicle trips associated with the project would not cause a CO hotspot, and sensitive receptors within the proposed project and in the vicinity of the project site would not be exposed to a CO hotspot.

The California Air Resources Board has classified diesel exhaust as a toxic pollutant that may pose a threat to human health. The US 101 does not provide the connection between major ports, rail spurs, and airports, which generate heavy volumes of truck traffic. A health risk assessment prepared by the SCAQMD in order to identify areas eligible for funding under the Carl Moyer Program indicates that the project site is not located along a freeway corridor where there exists a cancer risk of one in one million or greater. Based on the above, sufficient evidence is

available to indicate that project operation at this location would not result in a significant health risk from exposure to diesel exhaust.

Finally, the EIR evaluated the cumulative impact of the project based on the methodology outline on pages 4.8-30 through 4.8-31 of the EIR recommended by the SCAQMD. The analysis of cumulative impacts focuses on determining whether the project is consistent with forecasted future regional growth. If all cumulative projects are individually consistent with the growth assumptions upon which the SCAQMD's Air Quality Management Plan (AQMP) is based, then future development would not impede the attainment of ambient air quality standards and significant cumulative air quality impacts would not occur. The proposed school is considered a conditionally permitted use within the Santa Monica Mountains North Area Plan, which is a subset of the County General Plan. The control strategy of the AQMP is based on projections contained in local general plans. For this reason, projects that are consistent with local general plans are considered consistent with air quality related regional plans, such as the AQMP. Based on the above, and that the project would not cause a significant project impact, the emissions generated by the project are not considered cumulative considerable.

Findings

Pursuant to Public Resources Code Section 21081(a)(1) and State CEQA *Guidelines* Section 15091, the Regional Planning Commission finds that the project's adherence to the mitigation measures discussed below, in addition to the design features which are incorporated directly into the project, will avoid or reduce impacts related to air quality to a less than significant level.

Each development project in the South Coast Air Basin (SCAB) is required to comply with standard construction emission control practices to minimize the amount of fugitive dust and construction equipment emissions generated during construction. The SCAQMD has prepared a list of measures to reduce the impacts of construction-related emissions to the greatest extent possible. Those that could be feasibly implemented during the development of the project, in addition to Rule 403 – Fugitive Dust, are as follows:

(Note: these mitigation measures are recommended to ensure that emissions from overlapping construction and operational activities, associated with the anticipated 12-year duration of the project's construction, are maintained at less than significant levels.)

4.8-1 Develop and implement a construction management plan, as approved by the County, which includes the following measures recommended by the SCAQMD, or equivalently effective measures approved by the SCAQMD:

a. Configure construction parking to minimize traffic interference.

b. Provide temporary traffic controls during all phases of construction activities to maintain traffic flow (e.g., flag person).

c. Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the degree practicable.

d. Re-route construction trucks away from congested streets.

e. Consolidate truck deliveries when possible.

f. Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

g. Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications and per SCAQMD rules, to minimize exhaust emissions.

h. Suspend use of all construction equipment operations during second stage smog alerts. Contact the SCAQMD at 800/242-4022 for daily forecasts.

i. Use electricity from power poles rather than temporary diesel- or gasoline-powered generators.

j. If readily available at competitive prices, use methanol- or natural gas-powered mobile equipment and pile drivers instead of diesel.

k. If readily available at competitive prices, use propane- or butane-powered on-site mobile equipment instead of gasoline.

4.8-2 Develop and implement a dust control plan, as approved by the County, which includes the following measures recommended by the SCAQMD, or equivalently effective measures approved by the SCAQMD:

a. Apply approved non-toxic chemical soil stabilizers according to manufacturers' specification or other measures agreed to by the County to all inactive construction areas (previously graded areas inactive for four days or more).

b. Replace ground cover in disturbed areas as quickly as possible.

c. Enclose, cover, water twice daily, or apply approved soil binders to exposed piles (i.e., gravel, sand, dirt) according to manufacturers' specifications.

d. Water active grading sites at least twice daily.

e. Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.

f. Provide temporary wind fencing consisting of 3- to 5-foot barriers with 50 percent or less porosity along the perimeter of sites that have been cleared or are being graded, if necessary.

g. All trucks hauling dirt, sand, soil, or other loose materials are to be covered <u>or</u> should maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code.

h. Sweep streets at the end of the day if visible soil material is carried over to adjacent roads (recommend water sweepers using reclaimed water if readily available).

i. Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.

j. Apply water three times daily or chemical soil stabilizers according to manufacturers' specifications to all unpaved parking or staging areas or unpaved road surfaces.

k. Enforce traffic speed limits of 15 miles per hour or less on all unpaved roads.

l. Pave construction roads when the specific roadway path would be utilized for 120 days or more.

4.8-3 Painting contractors shall utilize low ROC content paints and solvents. The following SCAQMD website lists manufacturers who supply interior and exterior low or zero ROC paints: <u>http://www.aqmd.Gov/business/brochures/zerovoc.htm</u>.

7. Hydrology and Water Quality

Facts in Support of Findings

An evaluation of the project's potential impacts on hydrology and water quality is found on pages 4.9-1 through 4.9-17 of the EIR.

Building of the Heschel West School would result in the construction of additional impervious surfaces that would reduce water absorption and increase surface runoff and velocities. The Applicant has prepared a drainage concept that identifies the methods of capturing and controlling runoff during a design year storm event. The proposed drainage system is able to contain a design-year storm without causing flooding either on- or off-site. In fact, the project would have a beneficial impact on adjacent residences located along Chesebro Road, because the land area tributary to the rear of these homes will be reduced in the developed condition. Given that none of the proposed uses are within a 100-year flood hazard zone, and no downstream flooding is anticipated as a result of project build-out, no significant impart is anticipated.

With regards to water quality, construction and operation of proposed school is subject to the requirements of the National Pollutant Discharge Elimination System program. Use of the Best Management Practices as outline in the Storm Water Pollution Prevention Plan and Standard Urban Storm Water Mitigation Plan will reduce project related water quality impacts to less-than-significant levels.

Additional facts to support the findings below are found in the record of proceedings for the project.

Findings

Pursuant to Public Resources Code Section 21081(a)(1) and State CEQA *Guidelines* Section 15091, the Regional Planning Commission finds that the project's adherence to the following mitigation measures, in addition to the design features which are incorporated directly into the project, will avoid or reduce impacts related to hydrology and water quality to a less than significant level.

4.9-1 Final drainage plans shall be prepared to ensure that no significant flooding would occur during or after site development. These plans shall be prepared to the satisfaction of Los Angeles County Department of Public Works.

4.9-2 Final grading plans shall be prepared to ensure that no significant erosion or sedimentation would occur during or after site development. These plans shall be prepared to the satisfaction of the Los Angeles County Department of Public Works.

4.9-3 The Applicant shall satisfy all applicable requirements of the NPDES program in effect at the time of project construction to the satisfaction of the Los Angeles County Department of Public Works. These requirements include preparation of a Standard Urban Storm Water Mitigation Plan containing structural treatment and source control measures appropriate and applicable to the project.

C. <u>Environmental Effects of the Project Which are Considered Unavoidable Significant Impacts</u>

8. Visual Qualities

Facts in Support of Findings

An evaluation of the potential visual resource impacts associated with this project is found on pages 4.1-1 through 4.1-35 of the EIR.

Development of any use on the property would be governed by a Conditional Use Permit, which will contain design guidelines and development standards for the project. These standards regulate building setbacks, building heights,

permitted density ranges, define roadway design and landscaping, parking requirements, and monumentation and signage. Each of the above has been carefully crafted to create the desired character and visual image of the project.

Site development would change the visual character of a portion of the site from vacant land to a developed or man-made condition. All phases of the project have been designed to cluster development within the flatter, lower lying portions of the property. An objective of the planning process was to preserve visually dominant landform features that characterize the site and surrounding viewsheds. Moreover, the project has been designed to minimize mass and bulk conflicts with adjacent residences, for example by setting school buildings back approximately 280 feet from the rear yards of such residences, and by using building architecture that is consistent with prevalent styles in the community of Old Agoura.

The project would also introduce new sources of light and glare that could spill over onto adjacent sensitive uses, including the adjacent wildlife corridor, if not properly designed and installed. Mitigation is provided to reduce this impact to a less than significant level.

On a cumulative basis, the US 101 corridor is experiencing a general trend towards urbanization. This cumulative development is contributing to the loss of open space and changing the visual character of the area to one that is more urban in character, which is considered a cumulatively significant visual impact.

Findings

The significant cumulative and project-specific visual impacts associated with the project have been reduced to the extent feasible through incorporation of the mitigation measures enumerated below. However, the Regional Planning Commission finds that development of the proposed project would result in the conversion of vacant land to developed use, which is considered a significant, unavoidable cumulative visual impact. The Regional Planning Commission also finds that the significant impact identified above is outweighed by project benefits as set forth in the Statement of Overriding Considerations.

4.1-1 Landscaping consisting of natural vegetation shall be placed along the southern perimeter of Chesebro Road, as defined on the site plan. The purpose of this vegetation is to screen vistas of the completed project from motorists, walkers, and riders. Installation of this vegetative screen shall occur prior to grading. Maintenance and monitoring reports shall be prepared annually for a minimum of three years to ensure the long-term completion of this mitigation measure.

4.1-2 A landscape/revegetation plan shall be prepared by a registered landscape architect for review and approval by the County of Los Angeles Department of Regional Planning and California Department of Fish and Game prior to the issuance of the grading permit. The landscape/revegetation plan shall utilize indigenous plants and shall avoid invasive, non-native ornamentals to the maximum degree feasible.

4.1-3 The Applicant shall prepare a lighting plan that identifies the type, layout, and luminaire wattage. At a minimum the plan shall conform to the requirements defined below. The County of Los Angeles Department of Regional Planning shall approve final lighting orientation and design.

(1) Nuisance Prevention: All outdoor lighting fixtures shall be designed, located, installed and aimed downward or towards structures—if the light is effectively contained by the structure and no glare is visible off site—to prevent glare, light trespass and light pollution. No lights shall be directed towards nearby residences or open space.

(2) Lighting Levels: Outdoor lighting installations shall be designed to avoid harsh contrasts in lighting levels between the project site and the adjacent properties.

- The illumination provided by parking lot lighting shall average no more than 0.05 watts/square foot, which equates to a lighting power density consistent with parking lots in Lighting Zone 2.

- The illumination provided by on-site roadway lighting shall average no more than 0.03

watts/square foot, which equates to a lighting power density consistent with a two-lane roadway in Lighting Zone 2.

- The illumination provided by on-site walkway lighting shall average no more than 0.08 watts/square foot, which equates to a lighting power density consistent with walkways in Lighting Zone 2.

(3) Lamp Types: Metal Halide or high-pressure sodium lamps should be used in all areas deemed as security risks. Low wattage incandescent or compact florescent lamps should be used in all other portions of the campus.

(4) Fixture Types: All outdoor lighting shall use cut-off luminaries with the light source downcast and fully shielded with no light emitted above the horizontal plane.

(5) Accent Lighting: Architectural features may be illuminated by uplighting provided that the light is effectively contained by the structures, the lamps are low intensity used only to provide subtle lighting effects and no glare or light trespass is produced.

(6) Security Lighting: Security lighting should be activated with motion sensors to the extent feasible.

4.1-4 Project structures shall utilize non-reflective glass to avoid glare intruding onto adjacent residential properties.

9. Biological Resources

Facts in Support of Findings

An evaluation of the Project's potential impacts on biological resources is found on pages 4.5-1 through 4.5-54 of the EIR.

Implementation of the proposed project would permanently convert approximately 27 acres of the 73-acre property from a natural to a developed condition. In order to minimize disturbances associated with fuel modification, a Fire/Vegetation Management Plan has been prepared consistent with the County Fire Code(s). Compliance with the requirements of the Fire/Vegetation Management Plan will result in the disturbance of approximately 4.5 acres of natural areas (included in the 27 acres referenced above). Project construction would not directly impact special-status plant species found on site. However, there would be direct impacts to special-status communities' habitats including Valley needlegrass grassland and coastal sage scrub, which are considered special-status plant communities. To address project impacts, the Applicant has committed to putting fully 40 percent of its site into a permanent conservation easement, and the School is conditioned to dedicate to the National Park Service the portion of the site north of Chesebro Road, in the vicinity of Chesebro Creek. Mitigation is also provided to compensate for the direct loss to special status habitat.

The loss of some wildlife habitat during construction and operation of the proposed project could directly disturb wildlife residing on the project site, and/or utilizing lands immediately adjacent to the project site. Project operation would result in indirect impacts associated with increased human presence, the introduction of artificial lighting or glare and stormwater runoff. Project operation would not have a significant impact on the adjacent Liberty Canyon wildlife corridor located east and adjacent to the proposed site. Implementation of recommended mitigation measures would reduce project-related impacts on common and special-status plants and wildlife, to a less than significant level.

Finally, the EIR evaluated the cumulative impact of the project based on methodology outlined on pages 4.0-1 through 4.0-2 of the EIR. As stated therein, the cumulative analysis was based upon a list of past, present, and probable future projects. Buildout of the North Area Plan would result in the incremental conversion of open space

to a "built environment." The cumulative loss of open space would reduce land available to meet various ecological requirements and this loss is considered to be cumulatively significant.

Findings

The project-specific biological resource impacts associated with the project have been reduced to the extent feasible through incorporation of the mitigation measures enumerated below. However, the Regional Planning Commission finds that development of the proposed project would result in the conversion of vacant land to developed use, which is considered a significant, unavoidable cumulative loss of open space. The Planning Commission also finds that the significant impact identified above is outweighed by project benefits as set forth in the Statement of Overriding Considerations.

4.5-1 As a means of special-status species protection, prior to any grading/construction activities, pre-grading surveys for the mariposa lily and morning glory shall be conducted by a qualified botanist. Pre-construction reports shall be provided to the County of Los Angeles Department of Regional Planning. The loss of any such species would be mitigated through on-site enhancement as articulated below under Mitigation Measure 4.5-6.

4.5-2 Prior to any grading/construction activities, the Applicant shall install temporary fencing where site grading occurs adjacent to natural habitat to the north. Fencing shall be maintained and monitored by the Applicant for the duration of the grading/construction period. Monthly reports shall be provided to the County of Los Angeles Department of Regional Planning.

4.5-3 No earlier than 20 days prior to any grading activity that would occur during the breeding season, pre-construction/grading survey of the entire area proposed for grading/construction activities for any special-status bird species shall be conducted by a qualified biologist. If nests of special-status or other protected migratory bird species are observed, construction within 100 feet shall be postponed or halted at the discretion of the biological monitor, until the nest site is vacated and juveniles have fledged, as determined by the biologist. Implementation of this measure would ensure that no loss of active nests of either species will occur and, therefore, will reduce impacts on nesting birds to a less than significant level. Pre-construction reports shall be provided to the County of Los Angeles Department of Regional Planning.

4.5-4 Bird nests, which are state and federally protected, will not be disturbed during and following construction activities. The nesting/breeding season of native bird species potentially nesting on the site is typically February through August. In order to determine if active nests of bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present in the construction zone or within 300 feet (500 feet for raptors) of the construction zone, the Applicant shall have weekly field surveys conducted by a qualified biologist between 45 to 20 days (only) prior to construction activities. If active nests are found, a minimum 300-foot (this distance may be greater depending on the bird species and construction activity, as determined by the biologist) fence barrier shall be erected around the nest site and clearing and construction within the fenced area shall be postponed or halted, at the discretion of the biological monitor, until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of a second attempt at nesting. The biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. In addition, fuel modification activities, including vegetation removal and pruning, will not be conducted during the nesting season (February through August).

4.5-5 Construction personnel shall be instructed on the sensitivity of the area. The project Applicant or qualified biologist will record the results of the recommended protective measures described in order to document compliance.

4.5-6 A revegetation and maintenance plan shall be developed prior to the issuance of a grading permit by a qualified habitat restoration specialist acceptable to the Director of Planning, to be retained by the Applicant, that describes the specific actions, tasks, and methodologies to address the revegetation, enhancement, and maintenance of revegetated or restored habitat areas. The plan would specify, at a

minimum, the following: (1) the location of revegetation and enhancement areas; (2) the quantity and species of plants to be planted as well as those to be removed; (3) planting procedures, including the use of soil preparation and irrigation; (4) a schedule and action plan to maintain and monitor the plantings for a minimum five-year period; and (5) a list of criteria (e.g., growth, native plant cover, survivorship) by which to measure success of the plantings, as well as contingency measures if the plantings are not successful. This plan shall be approved by the County DRP, National Park Service, and other appropriate resource agencies. At a minimum, the plan will provide for the following replacement ratios and monitoring requirements:

- The direct loss of needlegrass grassland community shall be replaced at a 2:1 ratio by revegetating land that currently supports California annual grassland vegetation. The mitigation area will be located on site or at an alternative site approved by the CDFG and the Department of Regional Planning (DRP). Because of the disturbed nature of the on-site California annual grassland community and because it does not support Rare, Threatened, or Endangered species, the replacement of portions of this non-native grassland community with a native grassland community will not result in additional significant impacts.

- The direct loss of purple sage-California sage brush vegetation shall be replaced at a 1:1 ratio by enhancing remaining on-site disturbed or degraded vegetation.

- CDFG, DRP and the selected biological monitor shall approve a monitoring plan. At a minimum, the plan shall include quarterly monitoring by a qualified biologist for the first three years, and on an annual basis for two following years. During each monitoring visit, hand removal of non-native vegetation will be conducted. Approved success criteria shall be based on an overall percentage of vegetation cover and percentage of non-native plant species consistent with on-site high quality purple sage-California sagebrush habitat.

4.5-7 The following measures will be required in order to comply with local, state, and federal regulations regarding impacts to ACOE, CDFG, NRCS, and RWQCB jurisdictional areas:

(a) If determined practicable following review of the project plans by the Los Angeles County Fire Department, fuel modification zones shall not be closer than 75 feet to existing jurisdictional drainages.
(b) Permitting as required by ACOE and RWQCB shall be executed pursuant to Section 404 of the federal Clean Water Act, for all impacts to waters of the US. All conditions of the permits and certifications from these agencies that are designed to minimize impacts to biological resources and all measures to mitigate for the loss of jurisdictional habitats shall be implemented. Prior to permitting, representatives of the ACOE must conduct a field verification, and subsequent certification, of the biological conditions, functions, (i.e., intermittent or ephemeral water flow) and extent of jurisdictional resources on the site.
(c) If necessary, a Streambed Alteration Agreement shall be executed with CDFG pursuant to Section 1603 of the California Fish and Game Code. All conditions of that agreement designed to minimize impacts to biological resources, and all measures to mitigate for the loss of jurisdictional habitats, shall be implemented.

4.5-8 In order to protect the native plant communities that are located within the natural open space areas of the site, the plants listed in **Table 4.5-5** in the EIR will not be planted. In addition, the landscaped areas and the fuel modification zone shall utilize locally indigenous plants to the greatest extent feasible. The landscaping plans for the project shall be reviewed by a qualified botanist and DRP for approval prior to grading permit who shall recommend appropriate provisions to prevent other invasive plant species from colonizing remaining natural areas.

4.5-9 The Applicant will obtain a County-approved biological monitor to coordinate and periodically monitor construction activity to ensure that incidental construction impacts on biological resources are avoided or minimized. The monitor will be given authorization to stop specific construction activities if violations of mitigation measures or any local, state, or federal laws are suspected.

Responsibilities of the monitor include:

- Review/stake the construction limits in the field with the contractor and the County inspector in accordance with the final approved grading plan. The limits shall clearly delineate the location of Catalina mariposa lilies, California black walnuts, Valley oak tree, jurisdictional drainages, and the preserved natural open space areas on site.

- Prepare an instruction sheet for all equipment operators who will work on the site. The instruction sheet shall include information that will be stated in the CDFG Streambed Alteration Agreement, including, but not limited to, nesting bird information, protection of the preserved jurisdictional areas from litter, contaminants, and debris. Each operator will be required to sign an acknowledgment that they are aware of these conditions and that their violation of such conditions may result in their termination of work on the site and financial responsibility for correction of damage.

- The biological inspector shall conduct meetings with the contractor and other key construction personnel to describe the importance of restricting work to within the grading limit and outside of the preserved areas and to emphasize the sensitivity of nesting birds. The inspector should also discuss staging/storage areas for construction equipment and materials. The biological inspector shall investigate all on-site storage areas to minimize impacts to biological resources. Construction access, parking, storage of equipment and materials shall not occur within 25 feet of the drip-line of any California black walnut or Valley oak trees.

4.5-10 The construction contractor will ensure that temporary fencing is installed at the limit of grading near sensitive resources identified by the biological monitor. The fencing will remain in place until grading and excavation work is complete, and will be removed under the direction of the biological inspector. Prior to fence installation, the fencing contractor will be instructed to avoid driving on or immediately adjacent to sensitive biological resources, including remaining trees, remaining jurisdictional resources, and remaining natural habitats.

4.5-11 Where necessary, erosion control measures shall be constructed on the slopes below grading areas to prevent erosion and deposition of materials into areas with remaining California black walnut or Valley oak trees during grading and construction activities. These erosion control measures will also prevent silts from entering drainages.

Section III
Description And Background Of The Proposed Interim School Student Carpool/Busing Plan

A. Introduction

Following the RPC approval of the Project and certification of the EIR, a number of permanent mitigation improvements associated with the Project were identified by California Department of Transportation (Caltrans) which would push the opening of the School well beyond the desired occupancy date. As such, at its meeting of January 23, 2007, the Los Angeles County Board of Supervisors (the Board) directed the School to consider an "interim" School that might feasibly be utilized prior to the installation of the "ultimate" permanent traffic mitigation improvements included in the project's conditions of approval (the Interim School Project).

This solution required the School to develop an interim traffic plan that avoids all project-specific tertiary, and cumulative traffic impacts, provides an enhanced, measurable, and enforceable busing and/or carpooling program, and includes the evaluation of alternative access routes including but not necessarily limited to a one-way egress at Chesebro Road. Based on the Board's direction, a carpool/busing plan and associated Supplemental Environmental Analysis ("SEA") was prepared to consider operation of the school under this "Interim" condition, and circulated for a 45-day public review from October 1, 2001 through November 14, 2007.

B. Interim School Project Description

Pursuant to the Board's direction, an Interim School Student Carpool/Busing Plan (Interim School Project) was designed that would allow the school to begin operation with a student population of 390 students and avoids all project-specific, tertiary and cumulative traffic impacts. The Interim School Project includes limited occupancy, at a maximum of 390 students in grades pre-K through 8th Grade and would include the development of associated buildings and recreational facilities described in the EIR under Phase I or Phase II. Mitigation measures include a measurable and enforceable busing and/or carpooling program (the Carpool/Busing Plan). The Carpool/Busing Plan, as described in the SEA and outlined in Table 1 of the Traffic Impact Analysis, specifies inbound, outbound and total allowable vehicle trips during each of eight specific time periods throughout the day. The School will be required to comply with each of these trip cap allowances.

The Carpool/Busing Plan includes a vehicle trip monitoring program to the Interim School Project adheres to the vehicle trip limits and will not exceed traffic impacts attributable to the project on streets in the surrounding area. The monitoring and enforcement program will be incorporated into the project's overall CEQA mitigation monitoring and reporting program (MMRP). The monitoring program will include monthly compliance checks through random, unannounced traffic counts conducted over three consecutive days by a County or County-approved traffic consultant (Tier One Count). If violations are detected in the Tier One Count, a follow-up Tier Two Count will be performed within 15 days. If the Tier Two Count reveals non-compliance the School will be subject to a fine of $100 per vehicle trip in excess of the daily trip caps. If, over the course of a semester, four or more Tier One Count violations or two or more Tier Two Count violations are detected, the maximum permitted student enrollment for the subsequent school year will be reduced. Further, on a yearly basis, prior to the start of the school year, the School must submit a transportation management program to the County Department of Public Works.

In addition to the monitoring program, two important physical components of the Carpool/Busing Plan include a one-way loop for site access, involving one-way ingress at Canwood Street and one-way egress at Chesebro Road and an alternative location for vehicular access to and from the the School, along the east side of Palo Comado Canyon Road approximately halfway between the 101 Freeway's northbound on/off ramps and the intersection of Palo Comado Canyon Road with Driver Avenue and Chesebro Road (the Mid-Block Access).

The SEA also examines the School's most recent plans for grading in connection with the two proposed access routes for the School – the access proposed in the EIR, immediately north of Canwood Street (the Canwood Access) and the Mid-Block Access described above. The refined grading plans for the Canwood Access involve a 7 percent grade and retaining walls no taller than 10 feet and the grading plans for the Mid-Block Access roadway involve a landscaped sound-attenuating berm along the northern edge of the roadway, a landscaped median wall, and a landscaped bench drain south of the roadway.

C. Summary of SEA and Findings

One of the primary bases for the creation of the Interim School Plan is to further minimize environmental impacts – specifically, traffic impacts – in response to agency and public comments. The Carpool/Busing Plan does not amount to a substantial change to the Project, nor to the circumstances under which the Project is being undertaken, and accordingly could not reasonably result in new significant environmental effects or a substantial increase in the severity of impacts identified in the EIR.

Specifically, regarding potential traffic impacts resulting from the Interim School Project, even without the "ultimate" traffic and access improvements being considered by Caltrans, the School can operate without causing any significant traffic impacts at any of the five study intersections, provided that an aggressive student Carpool/busing program is used in combination with either the One-Way Loop or the Mid-Block Access scenarios for vehicular access to the campus. The net impacts of the proposed interim Heschel School (with carpool/busing and either the One-Way Loop or the Mid-Block Access) would also be well below the generally recognized thresholds for significance for impacts on any arterial monitoring intersection or freeway segment, or neighborhood streets.

Regarding potential impacts to air quality, the existing daily operational emissions would not exceed the SCAQMD's significance thresholds without the Interim School Project. With the introduction of the Interim School Project, mobile source emissions are further reduced and total operational emissions will remain below the significance thresholds.

Finally, regarding potential noise impacts, implementation of the Interim School Project would not increase the severity of an existing impact nor create a new impact not previously disclosed in the EIR.

Section IV

Findings Regarding Considerations Which Make Certain Alternatives Analyzed in the EIR Infeasible

The Regional Planning Commission makes the following findings and statements of fact regarding project alternatives identified in the EIR pursuant to Section 15091(a)(3) of the State CEQA *Guidelines*.

The consideration of alternatives is an integral component of the CEQA process. The selection and evaluation of a reasonable range of alternatives provides the public and decision-makers with information on ways to avoid or lesson environmental impacts created by a proposed project. When selecting alternatives for evaluation, CEQA requires alternatives that meet most of the basic objectives of the project while avoiding or substantial lessening the significant effects.

The State CEQA *Guidelines* state that a suitable alternative, which should be considered for some projects, is an alternative location. The Applicant considered over 18 separate sites during the search for a suitable campus location. However, there is no other site of suitable size, that could be acquired by the Applicant, that was zoned or contained General Plan designations suitable for an education facility, and which would go as far towards feasibly meeting the following basic project objectives:

- Design the campus in a manner that preserves the area's natural terrain.
- Construct a "state-of-the-art" private, educational institution to accommodate the growing demand for a Jewish educational, cultural, and recreational facility in the Conejo Valley;
- Accommodate a student population of sufficient size to support community demand and the range of creative and physical education programs and facilities (auditorium, dedicated library, gymnasium, athletic fields) needed to promote the academic needs of current and future students, faculty, and staff;
- Site the facility in the demographic center of the existing school population and the Jewish population in order to minimize travel times and maximize access to the facility;

- Promote learning by providing a quiet educational experience;

- Provide opportunities for public and private youth oriented recreational activities, and a community meeting facility; and

- Promote school security by locating the school on a secluded site with controlled access.

Analysis of a range of alternatives has been performed to provide information on ways to lessen or avoid the impacts of the proposed Heschel West School Project. Five alternatives were analyzed in the EIR. These alternatives are summarized in the EIR and include: (1) the No Project/No Development Alternative; (2) the Subdivision Alternative; (3) the Modified Site Plan; (4) the Reduced Development Intensity; and (5) the Alternative Means of Access Alternative.

Of these alternatives, the No Project/No Development Alternative is considered the environmentally superior alternative, but it fails to meet any of the basic project objectives. Section 15326(d)(2) of the State *CEQA Guidelines* indicates that, if the No Project Alternative is the "environmentally superior" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

In this instance, the Reduced Development Intensity Alternative is considered environmentally superior to the proposed project. However, social and other considerations make this alternative infeasible. Specifically, this alternative would not accommodate a student population of sufficient size to support community demand and the range of creative and physical education programs and facilities need to promote the academic needs of current and future students, faculty, and staff.

The Subdivision Alternative is considered *inferior* to the proposed project with respect to impacts on visual qualities and biological resources; *superior* to the proposed project with respect to impacts on transportation/circulation and air quality, and *equivalent* to the proposed project with respect to noise impacts, impacts on human health, geology/geotechnical hazards, fire services, and hydrology/water quality. In sum, the Subdivision Alternative is not considered environmentally superior to the proposed project. The Subdivision Alternative would not meet any of the basic project objectives.

The Modified Site Plan Alternative is considered *inferior* to the proposed project with respect to noise impacts and impacts on visual qualities; *superior* to the proposed project with respect to impacts on biological resources; and functionally *equivalent* to the proposed project with respect to all other impacts. In sum, while it would meet many of the basic project objectives, the Modified Site Plan Alternative is not considered environmentally superior to the proposed project.

The Alternative Means of Access Alternative is considered *equivalent* to the proposed project with respect to all potential environmental impacts, except that a Palo Comado Road ("Mid-Block") Access Alternative is considered *inferior* to the proposed project with respect to noise impacts. Thus, while the Alternative Means of Access Alternative would meet all of the basic project objectives, it is not considered environmentally superior to the proposed project.

Section V
Findings Regarding Growth Inducing Impacts

In general terms, a project may foster spatial, economic or population growth in a geographic area if it meets any one of the criteria that are identified below.

- The project removes an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area);

- The project results in the urbanization of land in a remote location (Leap-Frog Development);

- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.);

- The project establishes a precedent setting action (e.g., a change in zoning or general plan amendment approval).

The project site is located within the County of Los Angeles. The property is designated by the North Area Plan as N5 and is zoned A-1-5. A private school is a conditionally permitted use within the A-1-5 zone. The property can be afforded all necessary municipal services and supporting infrastructure without major expansions to existing systems. Given the above, the RPC finds that the project is not growth inducing.

Section VI
Findings Regarding Significant Irreversible Environmental Changes

Uses of nonrenewable resources during the initial and continued phases of a proposed project may be irreversible if a large commitment of these resources makes their removal or non-use thereafter unlikely. According to Section 15126(f) of the State CEQA *Guidelines*, the irretrievable commitment of such resources should be evaluated to assure that their current consumption by a proposed project is justified. Here, the proposed Heschel West School Project will commit some presently undeveloped lands, to urban uses. The commitment of undeveloped land to urbanized uses is, essentially, and irreversible environmental change.

In addition, construction of the proposed land uses would contribute to the incremental depletion of resources, including renewable as well as slowly- or non-renewable resources. Resources, such as lumber and other forest products, as well as water, are generally considered renewable resources. Such resources would likely be replenished during the time it takes for the project to become fully built out and occupied. For example, lumber supplies are increased as seedlings mature into trees, while water supplies are replenished as water is redistributed through the action of the hydrologic cycle. Given this, the development of the project would not result in the irreversible commitment of renewable resources, although there would be an incremental increase in the demand for them over its lifetime.

The demand for all such resources is expected to increase whether or not the proposed project is developed. The Department of Finance indicates that the population of southern California will increase 62 percent over the thirty-year period between 1990 and the year 2020. The resources consumed by the proposed project would be used to meet the need for a wide array of educational opportunities created by this growth. These resources would likely be committed to other projects in the region intended to meet this demand if the proposed project was not developed. Further, the investment of resources in the proposed project would be typical of the level of investment normally required for a community of this scale. Provided that all standard building codes, including energy conservation standards, are followed, no wasteful use of energy or construction resources is anticipated.

Section VII
Recirculation of the Draft EIR

Revisions to the EIR have been made as a result of the comments submitted on the RDEIR. These revisions only clarify, amplify, or make insignificant modifications to the conclusions reached in the RDEIR. None of these revisions represent significant new information that would result in the identification of a new significant impact or an increase in severity of such an impact, from either the projects or from a new mitigation measure proposed for implementation as part of the projects. Nor do these revisions include a new mitigation measure to reduce a significant impact that has been declined by the project Applicant.

Therefore, the Regional Planning Commission finds that Section 15088.5 of the State CEQA *Guidelines* does not require recirculation of the RDEIR, as the revisions made to the RDEIR merely clarified or amplified information found in that document.

Section VIII

Certification

The Board of Supervisors certifies that:

(1) The Final EIR has been completed in compliance with CEQA;

(2) The Final EIR was reviewed and considered by the Board of Supervisors prior to approving the project; and

(3) The Final EIR reflects the independent judgment and analysis of the County of Los Angeles.

Section IX
Statement of Overriding Considerations

As set forth in the preceding sections, the implementation of the Project may result in significant adverse environmental impacts that cannot be avoided even with the adoption of all feasible mitigation measures. Despite the occurrence of these effects, however, the County chooses to approve the Project because, in its view, the economic, social, and other benefits of the Project would render such adverse impacts effects acceptable.

The following statements identify why, in the County's judgment, the benefits of the Project as approved outweigh its unavoidable significant effects. Any one of these reasons is sufficient to justify approval of the Project. Thus, even if every reason is not supported by substantial evidence, the County would stand by its determination and each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and into the documents found in the Record of Proceedings.

The County finds that the benefits of the Project would include the following:

Educational Facility

The proposed modern campus will help to meet the demand for high-quality educational, cultural, and recreational opportunities in the growing Conejo Valley. The facilities will accommodate a student population of sufficient size to provide the array of programs and amenities (including an auditorium, dedicated library, gymnasium, and athletic fields) that are highly important to the academic and personal success of current and future students, and to the training and retention of school faculty and staff.

Open Space Conservation

The proposed project will result in the protection of approximately 29 acres of open space, through a permanent conservation easement. The area to be preserved is located adjacent to Liberty Canyon, which is owned by the Santa Monica Mountains Conservancy, and which is regarded as one of the last viable wildlife movement corridors connecting the Santa Monica Mountains to the Angeles and Los Padres National Forests through the Simi Hills adjacent to the project site.

Safety and Security

The proposed project will promote public safety and security. Not only would the school be located on a secluded site with controlled access, but also the school's emergency access road would provide an alternative evacuation route for residents of Chesebro Canyon. This would alleviate emergency traffic congestion at the intersection of Driver Avenue, Chesebro Road, Canwood Street, and Palo Comado Canyon Roads. In addition, the school's vegetation management and fire-retardant construction would help to create a protective buffer between wildland areas and adjacent residences, and the campus could also serve as a refuge for nearby residents in the event of fire.

Community Meeting Facility

The proposed project will include a convenient meeting facility, which could provide opportunities for public and private youth-oriented recreational activity. Summertime and/or weekend daytime special events, educational and recreational programs and activities will occur on a periodic basis. These activities and events may include religious and cultural programs, graduations, seminars, adult education classes, board meetings, and recreational sports activities.

Provision of School Faculty Jobs

The proposed project has been designed to accommodate a staff of 97 at build-out. The school currently operates with a staff of 40 and it is anticipated that existing staff would transfer over to the new site upon completion of the first phase of construction. The project will provide quality jobs for teachers, school administrators, and support staff.

Provision of Construction Jobs

Construction of the Project will provide, over the anticipated 12-year building period, work for numerous individuals in the construction industry, as well as for architects, engineers and other professionals.

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Bruce W. McClendon, FAICP
Director of Planning

**NOTICE OF COMPLETION AND AVAILABILITY
ADDITIONAL INFORMATION OF PROPOSED INTERIM SCHOOL
STUDENT CARPOOL/BUSING PLAN
FOR THE HESCHEL SCHOOL PROJECT**

**County Project Number 98-062
Conditional Use Permit Number 98-062
SCH No. 1998101060**

The County of Los Angeles Department of Regional Planning acting in the capacity of "Lead Agency" under the County Environmental Guidelines, Chapter III, Section 304, has filed a "Notice of Completion" of a **Supplemental Environmental Analysis of Proposed Interim School Student Carpool/Busing Plan for the Heschel West Day School Project.** This document has been prepared in accordance with, and pursuant to, the California Environmental Quality Act (CEQA), as amended; Public Resources Code, Sections 21000-21178; and the "Guidelines for Implementation of the California Environmental Quality Act" (State CEQA Guidelines), California Code of Regulation, Title 14, Chapter 15000-15387.

PROPOSED PROJECT AND SITE LOCATION

The approximately 73-acre site is located within unincorporated Los Angeles County, just north of the US 101 adjacent to the eastern boundary of the City of Agoura Hills. More specifically, the currently vacant site is located east of Chesebro Road and contains a series of ridgelines, which bound the proposed development envelope on the eastern and southern borders. The project consists of the phased construction of a private school at the base of the ridgelines. The school would provide education to grades pre-K–8. A total of nine, one- and two-story buildings are planned, totaling approximately 166,450 square feet of floor space. These structures would be constructed on a 20.7-acre portion of the property, with the remainder of the site remaining as play fields, landscape areas and open space. A total of 223 parking spaces are proposed for staff and guests on the project site.

A Draft EIR for the project was previously prepared and circulated for public review in October 2002. Data incorporated as part of that earlier EIR was evaluated during two public hearings conducted in March and May 2003. The Los Angeles County Regional Planning Commission and the involved public raised numerous issues during this time. At the conclusion of these public hearings, the Los Angles County Regional Planning Commission (RPC) requested that issues raised by that testimony be addressed in a revised and re-circulated EIR consistent with the procedural requirements of Section 15088.5 of the *State CEQA Guidelines*.

Section 15088.5(a) of the *State CEQA Guidelines* indicates that a lead agency is required to re-circulate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review. In the case of the proposed Heschel School, the applicant has modified the grading plan to lower the pad elevations, reduce the development footprint, and increase natural open space setbacks. The school phasing plan has also been revised so that the first phase more readily integrates into the later phases of school development. Therefore, a Revised Draft EIR was circulated from April 4 to May 18, 2005 (45-days) and a FEIR subsequently certified by the RPC and project approved on June 28, 2006.

The RPC's approval of the project and certification of the FEIR was appealed to the Los Angeles County Board of Supervisors. At its meeting of January 23, 2007, the Board directed the school to consider an "interim school" option that might be feasibly implemented while certain permanent traffic mitigations are being discussed and resolved with Caltrans and other parties. The Board also directed the school to contemplate a carpool/busing plan for the interim school to further reduce traffic impacts to the neighboring areas.
The purposes of this Supplemental Environmental Analysis is to examine the potential for environmental impacts associated with the interim school carpool/busing plan that might be new impacts, or more severe impacts, compared with those identified in the FEIR.

The previous comments received on the project are part of the project's administrative records, but these will not be responded. Consistent with CEQA and County of Los Angeles Department of Regional Planning policies and procedures, written comments on Supplemental Environmental Analysis will be accepted through close of the public comment period and will be responded. Responses to the written comments above will be circulated for 10 days prior to the Board's final decision.

REVIEWING LOCATIONS

The formal public review period for the Supplemental Environmental Analysis will be from **October 1, 2007 to November 14, 2007 (45-days).** Comments previously submitted on the previous documents including Revised Draft EIR and responded to in the FEIR will not be responded.

A public hearing on this Supplemental Environmental Analysis and the proposed project has been scheduled before the Los Angeles County Board of Supervisors at 9:00 a.m. on **November 27, 2007** in the Board of Supervisors Hearing Room, 500 West Temple Street, Los Angeles Ca. 90012.

To ensure public access to the Supplemental Environmental Analysis, copies of the document are available for review at the County libraries listed below:

- County of Los Angeles
  Agoura Hills Library
  29901 Ladyface Court
  Agoura Hills, CA 91301

- County of Los Angeles
  Malibu Library
  23519 West Civic Center Way
  Malibu, CA 90265

- County of Los Angeles
  Westlake Village Library
  31220 Oak Crest Drive
  Westlake Village, CA 91361

Copies of the Supplemental Environmental Analysis will also be available for public review Monday through Thursday, 7:30 a.m. to 6:00 p.m. at

County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

Please submit written comments on the Supplemental Environmental Analysis to Hsiao-ching Chen of the Department of Regional Planning at the above address.

HESCHEL WEST DAY SCHOOL

COUNTY PROJECT No. 98-062
CONDITIONAL USE PERMIT No. 98-062

SUPPLEMENTAL ENVIRONMENTAL ANALYSIS OF PROPOSED INTERIM SCHOOL STUDENT CARPOOL/BUSING PLAN

Prepared for:

County of Los Angeles

Prepared by:

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September 2007

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1 INTRODUCTION

1.1 PURPOSE AND BACKGROUND

This Supplemental Environmental Analysis has been prepared in conformance with the California Environmental Quality Act (CEQA) Statutes and *CEQA Guidelines* to address potential environmental impacts associated with a Proposed Interim School Student Carpool/Busing Plan for the proposed Heschel West Day School Campus (the Site), located east of Chesebro Road and Palo Comado Canyon Boulevard and north of U.S. Highway 101 (US 101) in the County of Los Angeles (the County), immediately adjacent to the City of Agoura Hills.

On June 28, 2006, the County's Regional Planning Commission (RPC) unanimously approved the issuance of a Conditional Use Permit to authorize the construction and operation of a private school at the Site, with a maximum of 750 students (the Project). The Regional Planning Commission also certified the adequacy of an Environmental Impact Report (EIR) for the Project, which evaluated the potential of the Project (and related discretionary approvals by the County) to cause adverse environmental impacts on the following:

- Visual Qualities
- Transportation and Access
- Noise
- Human Health
- Biological Resources
- Geotechnical Hazards
- Fire Services and Hazards
- Air Quality
- Hydrology and Water Quality

That EIR concluded that the Project would likely have a less than significant impact on Human Health, unavoidable significant impacts on Visual Qualities and Biological Resources and, for all other areas listed above, impacts that could be avoided or reduced to less than significant levels.

However, the RPC's approval of the Project, and certification of the corresponding EIR, has been appealed to the County Board of Supervisors (the Board). Moreover, in the months following the RPC's

approval of the Project, the California Department of Transportation (Caltrans) formally identified its requirements regarding the design, review, and approval of the recommended traffic mitigation improvements that fall within its jurisdiction. Based on those requirements, the timing of the installation of some of the permanent intersection mitigation improvements associated with the Project would likely be pushed well beyond the Heschel West Day School (the School) desired occupancy date for the new school site.

With these facts in mind, at its meeting of January 23, 2007 the Board directed the School to consider an "interim school" option that might feasibly be utilized while Caltrans and others work to resolve the design of the above-referenced traffic mitigation improvements. Specifically, the Board requested that the School "develop an interim traffic plan for a student body of no more than 390 students that fully mitigates all project-specific, tertiary, and cumulative traffic impacts, provides an enhanced, measurable, and enforceable busing and/or carpooling program, and includes an evaluation of alternative access routes including but not necessarily limited to one-way ingress at Canwood Street and one-way egress at Chesebro Road."

Based on the Board's direction, the School retained Hirsch/Green Transportation Consulting, Inc. to develop a Proposed Interim School Carpool/Busing Plan and prepare a Traffic Impact Analysis Report for same. In March 2007, Hirsch/Green prepared a Traffic Impact Analysis Report for a Proposed Interim School Carpool/Busing Plan (for a School with 390 students) that contemplates a one-way loop for site access, involving ingress at Canwood and egress at Chesebro (the One-Way Loop). Subsequently, in June 2007, Hirsch/Green prepared a Traffic Impact Analysis Report for a Proposed Interim School Carpool/Busing Plan (for a School with 390 students) that contemplates an alternative location for vehicular access to and from the campus at a point along the east side of Palo Comado Canyon Road, approximately halfway between the 101 Freeway's northbound on/off ramps and the intersection of Palo Comado Canyon Road with Driver Avenue and Chesebro Road (the Mid-Block Access). These Hirsch/Green plans, which contemplate both the One-Way Loop and the Mid-Block Access scenarios for the interim school with 390 students, shall be collectively referenced as the "Carpool/Busing Plan," and are included within this document as **Appendix A** and **Appendix B**, respectively.

The purpose of this Supplemental Analysis is to examine the potential for environmental impacts associated with the Carpool/Busing Plan that might be new impacts, or more severe impacts, compared with those identified in the EIR. Because the Carpool/Busing Plan involves (as discussed below) a reduced student enrollment and generally fewer car trips to and from the Site, it is reasonable to assume that many of the environmental impacts associated with the Carpool/Busing Plan would be *less significant* than those discussed in the EIR. However, the Carpool/Busing Plan does contemplate (as the name suggests) the use of buses, and presumably diesel-powered buses, which are substantially larger than

most cars. Accordingly, the focus of this Supplemental Analysis is the Carpool/Busing Plan's potential impacts in the categories of Transportation and Access, Noise, and Air Quality.

Secondarily, this Supplemental Analysis also provides an opportunity for public review and comment on the School's most recent plans for grading in connection with the creation of a campus access roadway in one of two locations – either immediately north of Canwood Street (the "Canwood Access"), or the Mid-Block Access described above. The potential impacts of grading activities associated with the creation of either of these access roadways were fully analyzed in the EIR. However, at the request of the Board and County staff, and in the interest of further minimizing the potential for environmental impacts, the School has since developed or refined plans for (1) a Canwood Access roadway involving a 7 percent grade and retaining walls no taller than 10 feet; and (2) a Mid-Block Access roadway involving a landscaped sound-attenuating berm along the northern edge of the roadway, a landscaped median wall, and a landscaped bench drain south of the roadway. Graphical depictions of these refinements to the grading plans for the School are included within this document as **Appendix C**.

1.2 LEAD AGENCY AND DISCRETIONARY APPROVAL

As defined by Section 15050 of the State *CEQA Guidelines*, the County of Los Angeles is serving as "Lead Agency" and is therefore responsible for preparing the environmental analyses for the Project.

The discretionary approval at issue is a Conditional Use Permit (CUP) to authorize the phased construction, operation, and maintenance of a private preschool, elementary, and middle school (grades pre-K through 9) for up to 750 students in the A-1–5 Zone. The requested CUP would also authorize a grading permit to be issued for the amount of earthwork necessary to develop the property as proposed, consistent with the definition of a grading project under Section 22.08.070 of the Los Angeles County Planning and Zoning Code.

1.3 DOCUMENTS INCORPORATED BY REFERENCE

Sections 15150 and 15168(c)(3) and (d)(2) of the State *CEQA Guidelines* allow and encourage environmental documents to incorporate by reference any other documents that provide relevant data.

The following documents are hereby incorporated by reference (or included as Appendices) within this Supplemental Analysis, and all of these documents are considered part of the Final EIR.

- Draft Environmental Impact Report, October 2002
- Revised Draft Environmental Impact Report, March 2005

- Final Environmental Impact Report (Including Responses to Comments on Revised Draft Environmental Impact Report), June 2006

- Findings of Fact Regarding the Final Environmental Impact Report and Statement of Overriding Considerations, June 2006

- Traffic Impact Analysis Report on Proposed Interim School Student Carpool/Busing Plan, March 2007 (included as **Appendix A**)

- Traffic Impact Analysis Report on Proposed Palo Comado Canyon Road Mid-Block Access and Interim 390 Student School Occupancy Plan (included as **Appendix B**)

1.4 CEQA REQUIREMENTS FOR SUPPLEMENTAL ANALYSIS

When a lead agency has already prepared an EIR, CEQA mandates that "no subsequent or supplemental environmental impact report shall be required... unless one or more of the following events occurs: (a) substantial changes are proposed in the project which will require major revisions of the environmental impact report; (b) substantial changes occur with respect to the circumstances under which the project is being undertake, which will require major revisions in the environmental impact report; (c) new information, which was not known and could not have been known at the time the environmental impact report was certifies as complete, becomes available." Cal. Pub. Res. Code Section 21166.

State *CEQA Guidelines* Section 15162 further clarifies that a subsequent or supplemental EIR is only required when "substantial changes" occur to a project or the circumstances surrounding a project, or "new information" about a project implicates "new significant environmental effects" or a "substantial increase in the severity of previously significant effects."

By contrast, when only minor technical changes or additions to a previous EIR are necessary, and when, as here, none of the conditions described above have occurred, CEQA allows the lead agency to prepare and adopt an "addendum" of similar supplemental analysis. State *CEQA Guidelines* Section 15164(b).

1.5 SUMMARY OF ANALYSIS AND FINDINGS

Because previous analyses of environmental impacts have been conducted for the proposed project (see list above), the County as lead agency has elected to prepare this Supplemental Analysis, and to circulate this Analysis for public review and comment.

One of the primary bases for the creation of the Carpool/Busing Plan is to further minimize environmental impacts – specifically, traffic impacts – in response to agency and public comments.

The Carpool/Busing Plan does not amount to a substantial change to the Project, nor to the circumstances under which the Project is being undertaken, and accordingly could not reasonably result in new significant environmental effects or a substantial increase in the severity of impacts identified in the EIR.

2 TRANSPORTATION AND ACCESS

This Section considers the differences in traffic impacts between the project as originally evaluated in the March 2005 EIR, and the Carpool/Busing Plan. A summary of traffic-related findings from the March 2005 EIR is presented first, followed by a comprehensive assessment of the Carpool/Busing Plan.

2.1 SUMMARY OF TRAFFIC RELATED IMPACTS IDENTIFIED IN THE 2005 EIR

The following traffic impacts and mitigation measures were identified in the 2005 EIR and represent the impacts associated with full enrollment at the Abraham Joshua Heschel Day School–West.

At maximum enrollment, it was determined the project would generate 2,638 daily trips. Of these, 720 of trips would occur during the morning peak hour, 508 trips would occur during the school PM peak hour, and an additional 79 trips would occur during the normal PM peak hour. A summary of trips generated by the project is included in **Table 1.**

Table 1
Project Traffic Generation

				School			
		AM Peak Hour		PM Peak Hour		PM Peak Hour	
Proposed Uses	**Daily**	**In**	**Out**	**In**	**Out**	**In**	**Out**
Heschel School							
660 Students	2,231	382	265	220	249	0	40
90 Preschool Students	407	39	34	18	21	18	21
TOTAL	**2,638**	**421**	**299**	**238**	**270**	**18**	**61**

Source: Crane and Associates, February 2005

This level of trip generation would be expected to significantly impact three of the study intersections during one or more of the peak periods under consideration, prior to mitigation. However, with implementation of recommended mitigation measures, all project-related impacts would be reduced to less than significant levels. No significant impacts are anticipated to occur on any of the nearby neighborhood streets or to any of the Los Angeles County Congestion Management Program (CMP) monitoring intersections or freeway segments.

Additionally, introduction of traffic generated by cumulative and related projects in the project vicinity would be expected to result in significant impacts at all five of the studied locations, prior to mitigation.

The 2005 EIR found that these significant cumulative impacts could be mitigated to less than significant levels through implementation of the project's recommended improvements. These improvements would be funded in part by the applicant's payment of its "fair share" contribution towards the cost of additional long-term intersection and freeway ramp improvements, some of which have already been proposed by the City of Agoura Hills.

Traffic Mitigation 1

Canwood Street and Chesebro Road at Driver Avenue and Palo Comado Canyon Road – This un-signalized intersection currently meets the County's warrant for traffic signal installation, indicating that a traffic signal is necessary at this location to accommodate existing traffic volumes. Therefore, the project should contribute its fair share toward installation of a signal. However, the intersection is under the jurisdiction of the City of Agoura Hills. Should the City of Agoura Hills determine that a traffic signal is unacceptable, the following alternative "non-signalized" improvement is recommended.

Improve the eastbound and westbound approaches of this intersection (Driver Avenue and Palo Comado Canyon Road, respectively) to install an exclusive left-turn lane, in addition to a shared through/right-turn lane, in both directions. Some minor roadway widening on both approaches within the existing rights-of-way would be required in order to implement this improvement. The intersection would remain four-way stop-sign controlled.

To monitor the timing of implementation, the applicant shall prepare annual enrollment reports for submittal to the Los Angeles County Department of Public Works. This mitigation measure shall be implemented before enrollment reaches 660 day-school students and 20 percent of the total preschool enrollment.

Traffic Mitigation 2

Palo Comado Canyon Road at US 101 Westbound Ramps – Two alternative improvements are proposed for this location. Either of these recommended improvements shall be implemented prior to initial occupancy of the school would provide appropriate traffic control for the intersection and would accommodate the proposed project's Canwood Street access location as part of an expanded intersection configuration.

(i) **Roundabout** – Reconstruct the intersection, including all approaches, to install a new traffic roundabout, more commonly known as a "traffic circle." As proposed, the recommended roundabout design would include an approximately 45- to 50-foot radius inner circle, with a single travel lane around the circle. The roundabout would control all approaches to this

intersection, including both the northbound and southbound Palo Comado Canyon Road approaches, the westbound US 101 on/off ramps, and the Canwood Street approach. It is possible that some or all of these approaches would be "flared" to provide two storage lanes, and the minor approach from Canwood Street may also be "yield" sign controlled. The final design of the roundabout shall be reviewed and approved by Caltrans and the County Department of Public Works, and may require rights-of-way in excess of that currently available.

(ii) **Traffic Signal** – Reconfigure the intersection to include the Canwood Street approach as part of an overall intersection geometry, and install a new traffic signal at this intersection. Re-stripe the westbound Canwood Street approach to provide one shared left-turn/through lane and one exclusive right-turn lane. The southbound approach of Palo Comado Canyon Road should be re-striped to provide one left-turn lane (to Canwood Street), one through lane, and one right-turn-only lane. Widen and re-stripe the westbound US 101 off ramp to provide an additional right-turn-only lane, to accommodate the project traffic U-turn movement directly onto Canwood Street.

The traffic signal would operate on a three-phase cycle, with the westbound approaches of the westbound US 101 offramp and Canwood Street having separate phases. Special traffic signal heads would be installed to prevent confusion to drivers entering the intersection, and signal timing and phasing would be designed to prevent vehicles from becoming "trapped" within the intersection.

The "roundabout" alternative was suggested by Caltrans during preliminary reviews of the initial traffic study. Caltrans has recently been exploring the roundabout interchange design, and has installed roundabouts at several freeway ramp/surface street intersections throughout the state. Although the original "traffic signal" mitigation proposal is acceptable to Caltrans, the characteristics of this intersection prompted Caltrans to request an analysis of a roundabout design.

Caltrans will ultimately decide which of the two mitigation alternatives will be installed at the Palo Comado and US 101 ramp/Canwood Street location. Although Canwood Street is within the City of Agoura Hills, Caltrans has jurisdiction of the intersection under access control provisions of its freeway agreement with the City. Preliminary discussions with Caltrans indicate that either the traffic signal or the roundabout designs for the intersection mitigation could be feasibly constructed within existing rights-of-way and fully address the project's impacts. However, it is Caltrans' policy that no decision would be rendered until the project has been approved, and an encroachment permit to construct the proposed mitigation has been filed. At that time, Caltrans would conduct the necessary engineering

studies to determine which of the two alternatives are selected. The roundabout alternative would not cause significant effects beyond those caused by the project as proposed.

Traffic Mitigation 3

Chesebro Road and US 101 Eastbound Ramps at Dorothy Drive – This unsignalized intersection currently meets the County's warrant for traffic signal installation, indicating that a traffic signal is necessary at this location to accommodate existing traffic volumes. Therefore, the project should contribute its fair share toward installation of a signal. However, if a traffic signal is found unacceptable, the following alternative "non-signalized" improvement is recommended.

Re-stripe the northbound approach of this intersection to provide one shared left-turn/through lane, and one shared through/right-turn lane. In addition, re-stripe the US 101 on ramp to provide two receiving lanes. The right lane of the on ramp should be striped as a "drop lane," which merges with the left lane.

To monitor the timing of implementation, the applicant shall prepare annual enrollment reports for submittal to the Los Angeles County Department of Public Works. This mitigation measure shall be implemented before enrollment reaches 80 percent of the proposed total (approximately 531 of the 660) day-school students.

In addition to the three mitigation measures discussed above, the following roadway improvements are recommended as part of project implementation, to enhance travel in the project vicinity:

Traffic Mitigation 4

Palo Comado Canyon Road Improvements – Prior to initial occupancy of the school, Palo Comado Canyon Road shall be improved along the west side to complete a 32-foot half roadway from Canwood Street/Chesebro Road to the westbound US 101 on ramp.

Traffic Mitigation 5

At the time a fee-district for roadway improvements is established within the North Area Plan, the project applicant shall contribute a "fair share" amount, as determined by the fee structure established for the district, to fund widening of the Chesebro Road overpass and reconfiguration of the Kanan Road interchange consistent with the proposed circulation improvements identified in the Santa Monica Mountains North Area Plan.

Traffic Mitigation 6

Canwood Street and Chesebro Road at Driver Avenue and Palo Comado Canyon Road – In addition to the traffic signal improvements described previously to address project-specific impacts, re-stripe the eastbound approach of this intersection (Driver Avenue) to install an exclusive left-turn lane. Along with a shared through/right-turn lane, re-stripe the southbound approach of the intersection (Chesebro Road) to provide an exclusive left-turn lane plus a shared through/right-turn lane. Some minor roadway widening within the existing right-of-way would be required in order to implement this improvement.

However, if the traffic signal is not acceptable, the following "non-signalized" improvements are recommended.

- In addition to the installation of the eastbound left-turn lane to address project specific mitigation, the eastbound approach of this intersection (Driver Avenue) shall be improved by installing an additional through lane resulting in one exclusive left-turn lane. Additionally, one through lane and one shared through/right-turn lane shall be installed. It is likely that additional rights-of-way would be needed in order to accommodate the roadway widening necessary to implement this cumulative improvement, and the project shall pay its fair share toward the cost of acquiring any necessary rights-of-way. The intersection would retain the existing four-way stop sign control.

Traffic Mitigation 7

Palo Comado Canyon Road at US 101 Westbound Ramps – No additional improvements are necessary under the "roundabout" alternative improvement at this location, as the proposed measure would be adequate to reduce cumulative impacts at this intersection to less than significant levels. However, if the traffic signal improvement alternative is selected for implementation, an additional through lane should be installed for both the northbound and southbound approaches, in addition to a new northbound left-turn lane. The cumulative improvement would result in a final intersection configuration of one left-turn lane, one through lane, and one shared through/right-turn lane for northbound traffic, and one left-turn lane, two through lanes, and one right-turn lane for the southbound approach. This ultimate improvement would require the existing two-lane bridge crossing the US 101 to be widened to its full width. The project is required to contribute its fair share funding toward this improvement.

Traffic Mitigation 8

Chesebro Road and US 101 Eastbound Ramps at Dorothy Drive – No additional improvements beyond the recommended project-specific improvement measure are necessary to address cumulative impacts, whether the traffic signal or "non-signalized" improvement is selected.

Traffic Mitigation 9

Chesebro Road and Palo Comado Canyon Road at Chesebro Road – Install a traffic signal at this location, which is forecast to meet warrants under future 2010 ambient growth conditions. However, if a traffic signal is not acceptable, re-stripe the intersection to provide one left-turn lane and one right-turn lane for the eastbound (Chesebro Road) approach. Re-stripe northbound Palo Comado Canyon Road to add an exclusive left-turn lane in addition to a single through lane. Re-stripe the westbound direction of Chesebro Road west of Palo Comado Canyon Road to provide two "receiving" lanes (one each for the new northbound left-turn lane and for the existing southbound right-turn lane from Palo Comado Canyon Road).

Traffic Mitigation 10

Chesebro Road and Laura La Plante Drive at Agoura Road – Install a traffic signal at this location, which is forecast to meet warrants under future 2010 ambient growth conditions. If a traffic signal is not acceptable, re-stripe this intersection to provide a left-turn only lane and one shared through/right-turn only lane for the eastbound approach, one shared left-turn/through lane plus a right-turn lane on the westbound approach, and one left-turn lane and one shared through/right-turn lane for the southbound approach.

2.2. SUMMARY OF TRAFFIC RELATED IMPACTS ASSOCIATED WITH THE PROPOSED CARPOOL/BUSING PLAN

Subsequent to the Los Angeles Regional Planning Commission approval of the proposed project in June 2006, Caltrans formally identified its requirements regarding the design, review, and approval of the recommended mitigation improvements under its jurisdiction. Based on those requirements, the timing of the installation of some of the permanent intersection mitigation improvements would likely be pushed well beyond the School's desired occupancy date for the new school site.

Preliminary conversations had identified that Caltrans would allow the preparation of a Project Engineering Evaluation Report (PEER) that would examine only the design aspects of the preferred roundabout improvement. However, subsequent to those preliminary conversations, Caltrans announced that it would require the evaluation and comparison of both potential improvements at the site access intersection – the roundabout and the alternative traffic signal improvement.

Complying with Caltrans' requirement would result in the preparation of a much more detailed Project Report/Project Study Report (PR/PSR), which is a significantly more lengthy and analysis-intensive process. As a result of this decision by Caltrans, coupled with the ongoing concerns by the City of

Agoura Hills regarding potential school related traffic impacts and mitigation measures, installation of any of the identified permanent intersection mitigation improvements would likely be pushed well beyond the school's desired occupancy date for the new school site.

In recognition of these conditions and situations, and in order that the School may occupy its site once development/construction of the approved facilities are completed, the Board of Supervisors has proposed that the Heschel School identify and implement an interim School occupancy program. This program would potentially use an aggressive carpooling/busing program and alternative site access routes, to support a reduced-enrollment 390-student campus until such time as the "ultimate" traffic and access improvements can be identified and implemented.

Based on the Board of Supervisors direction, Hirsch/Green Transportation Consulting, Inc. (Hirsch/Green) was retained to identify a student carpooling/busing program (that also considers two alternative site access scenarios – the One-Way Loop and the Mid-Block Access) and analyze the potential traffic impacts of such a program on the surrounding street system.

The parameters of this study were scoped with Los Angeles County Department of Public Works to ensure that appropriate analysis methodologies and assumptions were utilized. Based on those discussions, the study was based on data and assumptions contained in the approved traffic study prepared for the Heschel School (Crain & Associates, Revised February 2005), although this supplemental analysis focuses primarily on the forecast future (year 2010) traffic conditions at the five area intersections identified in those analyses. The intersections, listed below, represent the locations most likely to be affected by traffic generated by the proposed student busing program.

- Canwood Street/Chesebro Road at Driver Avenue/Palo Comado Canyon Road
- Palo Comado Canyon Road at US 101 Freeway Northbound On/Off-Ramps
- Chesebro Road/US 101 Freeway Southbound On/Off-Ramps at Dorothy Drive
- Chesebro Road and Palo Comado Canyon Road at Chesebro Road
- Chesebro Road and Laura La Plante Drive at Agoura Road

The reports prepared by Hirsch/Green (in March and June 2007) summarize results of a traffic impact analysis of two options for site access – the One-Way Loop and the Mid-Block Access – that, in combination with an aggressive student carpooling and/or busing plan, would allow the interim occupancy of the school for up to 390 of the total 750 students without creating significant traffic impacts to the surrounding area.

The strategy for this subsequent traffic analysis was adopted to address the Board's intent to accomplish the following objectives, based on the testimony and discussion at the January 23rd, 2007 Board hearing:

- identify alternative access and/or student transportation options would permit the school to operate at an acceptable operational level during the Caltrans/Los Angeles County/City of Agoura Hills mitigation improvement analysis and approval process; and

- provide an interim School occupancy program that would minimize traffic additions and impacts to the surrounding community and would not require the installation of any substantial roadway improvements, thereby avoiding the potentially time-consuming tasks associated with mitigation design, review, approval, and implementation of roadway improvements that would unnecessarily further delay occupancy of the School in the short term.

In addition to these intersections, traffic conditions and potential project traffic impacts on several residential streets providing access to the project vicinity were also evaluated, including Driver Avenue, Chesebro Road, Palo Comado Canyon Road, and Canwood Street.

2.3 ORIGINAL PROJECT VS. CARPOOL/BUSING SCENARIO

Original Project Details

As described in detail in the approved project traffic study (Crain & Associates, Revised February 2005), the originally-analyzed Heschel School proposal is for the development and operation of a new 750-student Jewish day school (with 660 students in grades K–8, and 90 pre-school students). Upon completion of the proposed School campus, the existing Heschel School campus, located at 27400 West Canwood Street, would be vacated, and all operations, faculty and staff, and student population relocated to the new site.

The original project would provide separate pre-school, kindergarten, elementary and middle school facilities, including two library buildings, an auditorium, a multipurpose/cafeteria area, and a gym including separate boys and girls locker rooms. Surrounding these buildings, an athletic field, garden, play areas, tennis courts, and a pool are also planned for construction.

Parking for the project would be provided by a total of approximately 223 permanent parking spaces located within several surface parking lots. Access to the parking areas and the school would be provided via a new driveway located near the eastern terminus of Canwood Street, east of Palo Comado Canyon Road. This portion of Canwood Street is discontinuous with the primary portion of Canwood Street located south and west of Palo Comado Canyon Road, and presently serves only as a secondary access for an adjacent gas station at the northeast corner of Canwood Street and Palo Comado Canyon Road. This new project access driveway would serve an internal roadway that circles the school and provides on-site vehicular circulation within the school grounds. A secondary, "emergency only" access

to Chesebro Road, located near the northern project boundary (north of the intersection with Driver Avenue/Palo Comado Canyon Road) would also be provided, as required by the Los Angeles Department of Regional Planning. This improvement is in response to Los Angeles County Fire Department, City of Agoura Hills, and general community concerns regarding fire safety for the project and surrounding area.

Permanent buildings for the school are to be developed in a series of phases over the course of approximately 12 years, with student enrollment growing in accordance with the capacity of the completed campus during each phase. Phase I would place a series of both permanent and modular structures on the site to accommodate between 350 and 390 students, and is anticipated to be completed within approximately one year from project approvals.

Phase II would construct additional permanent facilities to replace many of the modular structures, plus add permanent athletic fields to the site. This second phase of the project would begin within approximately two years of completion of Phase I, and allow for a total enrollment of up to 670 students. Phase III would continue the development of the permanent structures on the project site, and would allow for the full enrollment of 750 students by the year 2010. Phases IV through VI would complete the development of the school facilities through the 12-year program. These later phases would continue to replace temporary modular facilities with the final permanent buildings, but would not result in any increases in enrollment beyond the maximum 750 students allowed by 2010 as part of Phase III.

As described in the approved February 2005 project traffic study, the "full enrollment" project as described above would result in a total of three significant impacts during one or more of the peak analysis periods. Impacts would occur at the following intersections:

- Driver Avenue/Palo Camodo Canyon Road at Canwood Street/Chesebro Road;
- Canwood Street/Palo Comado Canyon Road at the US 101 Northbound Ramps; and
- Dorothy Drive and US 101 Southbound Freeway Ramps.

Measures to mitigate these project-specific impacts of the original "full enrollment" project have been described in the previous section and include both signalized (installation of new traffic signals) and un-signalized alternatives. Some of these alternatives also recommended roadway or localized intersection widenings and/or restriping, in response to City of Agoura Hills comments noting the rural nature of the vicinity and the incompatibility of traffic signals within this area. The mitigation proposals to address project impacts at the project's primary access location of Canwood Street/Palo Comado Canyon Road at the US 101 Northbound Ramps also included a "roundabout" alternative suggested by

Caltrans. All of the proposed measures and alternatives were deemed acceptable, and each reduced the impacts of the approved project to less than significant levels.

Proposed Interim (390-Student) School Project Details

The proposed interim solution was selected in an effort to maintain construction efficiencies included in the already approved "full enrollment" School project. Under this alternative plan, the actual development of the site, including all structures, parking facilities, play areas and athletic fields, and access and internal site circulation elements would continue as proposed. However, occupancy of the School site would be limited to 390 students in grades pre-K through 5th Grade until such time as the "ultimate" mitigation improvements described in the project's conditions of approval can be completed.

For ease of reference, a Site Plan for the Proposed Interim School (which corresponds with what are described above as Phases I and II of the construction of a permanent campus) is attached as **Appendix D**.

The primary objective of the Proposed Interim School program is to provide options which would allow occupancy of the school during the design, approval, and installation process necessary for implementation of the required "ultimate" project traffic mitigation measures identified in the project EIR, or mitigation measures as subsequently determined during the mitigation approval process. In order to achieve this objective, any interim occupancy program would, of necessity, need to avoid significant traffic impacts that would require installation of any such mitigation improvements. An examination of the approved project traffic study indicated that, of the three project-specific traffic impacts produced by the "full enrollment" (750-student) School, two of those impacts (at Driver Avenue/Palo Camodo Canyon Road at Canwood Street/Chesebro Road, and at Dorothy Drive at the US 101 Southbound Freeway Ramps) could be avoided simply by reducing the net trip generation of the school during the peak periods.

However, impacts at the third location, the project's proposed main entrance location at the intersection of Canwood Street/Palo Comado Canyon Road at US 101 Northbound Ramps) presented other issues. This particular intersection has an unusual offset configuration, with both Canwood Street and the US 101 Northbound Off-Ramp intersecting Palo Comado Canyon Road on the east side of the roadway. Additionally, the US 101 Northbound Off-Ramp is located opposite the Off-Ramp on the west side of Palo Comado Canyon Road. Due to this unique intersection configuration, with the US 101 Northbound Off-Ramp and Canwood Street intersecting Palo Comado Canyon Road within approximately 50 feet of each other, operations at this intersection in the future, assuming School traffic entering and exiting on Canwood Street, would require a significant amount of traffic control. As identified in the approved

project traffic study, two mitigation alternatives are being considered for this intersection, a traffic signal, and a "roundabout" design. Both potential mitigation measures would fully address the need for intersection approach controls, and would fully mitigate the impacts of the "full enrollment" School project.

A detailed review of the operations of this intersection, however, revealed that the critical component requiring access control was the "outbound" traffic from Canwood Street; the "twin approach" configuration of Canwood Street and the US 101 Northbound Off-Ramp on the east side of Palo Comado Canyon Road necessitates separating the westbound traffic flows on each of these approaches in order to avoid conflicting movements occurring at the same time. As such, even nominal amounts of Heschel School traffic exiting from Canwood Street to Palo Comado Canyon Road would require some type of traffic control, resulting in a "mitigation" improvement for any site access scenario involving "outbound" school traffic at this location. Therefore, it was determined that elimination of westbound Canwood Street project traffic would allow for a simpler operation of this intersection, and provide the opportunity to develop an interim School access scheme that would not require mitigation.

The approach described above resulted in the development of two alternative means of vehicular access to an from the campus – the One-Way Loop, and the Mid-Block Access – both of which would eliminate "outbound" (westbound) project traffic from the intersection of Palo Comado and Canwood.

Although these alternative access scenarios result in slight modifications of the School traffic distributions at two of the study intersections (Driver Avenue/Palo Camodo Canyon Road at Canwood Street/Chesebro Road, and Dorothy Drive at the US-101 Southbound Freeway Ramps) as compared to the original study appended to the EIR, the overall travel patterns for School traffic adhere to those identified in the approved traffic impact analyses, and do not present a significant departure from those assumptions.

Interim School Project Trip Generation Estimates

A thorough assessment of the potential School operations was conducted by the Heschel School administration to provide information for the supplemental analysis, including the arrival/departure times of the School's faculty and staff, and each of the grade levels (pre-K through 5th Grade) anticipated at the interim School.

The resulting interim School operations plan identified three distinct elements of the School's arrival/departure timelines:

- Kindergarten and pre-K classes;

- 1st through 5th Grades; and
- School's faculty/staff.

Approximately 138 students are anticipated to be in the Kindergarten and pre-K classes at the maximum 390-student school-enrollment cap. These students are generally five years or younger, and therefore, attend classes on a limited schedule from approximately 9:00 AM to about 2:00 PM. Due to their ages, these students are not anticipated to significantly participate in a typical "busing" program, although carpooling of these students would be mandatory.

The remaining 252 1st through 5th Grade students would utilize a more traditional school schedule, with class start times generally around 8:00 AM, and dismissal times between 3:00 and 3:30 PM. These older students were assumed to be the primary candidates for the proposed busing program. To provide flexibility, some carpooling of these students was also assumed.

The School's 71 faculty and staff generally arrive between about 7:30 and 8:00 AM. Typical of many administrative, custodial, and teaching staff, however, many of these personnel do not leave the School site at the class dismissal times and stay to complete business or teach/participate in extracurricular after school activities. Based on information provided by the School, it is estimated that most of the staff departs the site between 15 minutes and 1 hour following class dismissal. In order to provide maximum flexibility for the School, and to examine the potential "worst case" traffic impacts, none of the faculty/staff were assumed to participate in the proposed busing program, although some carpooling and/or ride share activities for the faculty/staff is anticipated.

Included in the estimation of the potential trip generation for the interim School is the ultimate goal that the interim School would operate at its maximum enrollment level of 390 students without creating a significant traffic impact on any of the study intersections or within the surrounding community. As a result, the determination of the number of vehicles "allowed" at each of the intersections without triggering a significant impact was factored into the development of the preliminary carpooling and busing participation estimates. This process was based on the revised "One-Way Loop" access travel patterns and utilized the "Future (2010) Without Project" traffic volumes and analyses contained in the approved project traffic study as a baseline.

Calculation of vehicle trips involved a number of operational assumptions, depending on the type of activity being examined. Assumptions included the following:

- For faculty/staff calculations, none of the 71 faculty and staff were assumed to be included in the busing program. This assumption was based on the need for teachers, school administrators, and

other staff to work schedules that may not adhere to specific bus schedules dictated by student arrival and departure activities.

- Trip generation for faculty/staff was assumed to reflect the following characteristics; all 71 faculty/staff would "drive alone" to the site, although an average vehicle occupancy (AVO) of approximately 1.2 persons per vehicle (based on general travel characteristics in the Southern California region) was also assumed, indicating some nominal level of potential site-related carpool activity. This assumption resulted in an estimated total of approximately 59 faculty/staff-related vehicles.

- Approximately 20 percent of the faculty/staff would be dropped off and picked up from the site by a spouse or other person as part of an off-site "ride share" trip (for instance, a teacher would be dropped off at the School in the morning by a spouse or other driver on their way to work or as an interim stop along an existing trip). This assumption results in an "outbound" faculty/staff trip component during the AM peak hour, and an "inbound" trip component during the afternoon periods, further producing a "worst case" trip estimate for faculty/staff at the School.

All "arriving" faculty/staff trips would occur during the AM peak hour, but departures would be spread throughout the afternoon. Approximately 20 percent of the faculty/staff were assumed to leave the School during the PM School peak hour period, with an additional 50 percent leaving during the Pre-PM peak hour (about 15 to 45 minutes after class dismissal), with the remaining 20 percent leaving during the typical PM peak hour period.

Los Angeles County Department of Public Works Traffic Impact Thresholds

The Los Angeles County Department of Public Works defines a significant traffic impact at intersections based on a "stepped scale," with intersections at high volume-to-capacity ratios and levels of service exhibiting more sensitivity to additional traffic than those operating at better levels of service. A significant impact is identified as an increase in the Congestion Management Agency (CMA) value of 0.040 or more when the final "With Project" Level of Service (LOS) is LOS C (CMA range 0.701 to 0.800), a CMA increase of 0.020 or more at LOS D (CMA range 0.801 to 0.900), or a CMA increase of 0.010 or more at LOS E or F (CMA range 0.901 or greater). No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic flows.

Analysis of Proposed Carpool/Busing Plan for Interim School

Analysis was based on the traffic study forecasts of "Future (2010) Without Project" (ambient traffic growth scenario) contained in the approved project traffic study appended to the EIR, in order to provide a comparable assessment of potential interim bus program trips versus the original "full enrollment" project impact analyses. The net project trips were added to the "Future (2010) Without Project" baseline

traffic volumes to produce the anticipated "Future (2010) With Interim Busing Program" conditions at the study intersections.

Occupancy of the new School site would include the incorporation of existing students from the current Heschel School site near Liberty Canyon Road and their associated trips. To prevent "double counting" of the student related trips, the existing student trips were subtracted from the future conditions for the AM peak hour, PM School peak hour, and PM peak hour conditions.

However, no "existing" student trip credits were assumed for the "off peak" time periods, since no data was collected regarding the existing site trip generation during these times. Although it is expected that some "off peak" trip activity currently exists, this assumption guarantees a "worst case" assessment of potential impacts during the "off peak" hours. It should be noted that these existing student trips are primarily automobile trips, carrying only one to a few students each. The proposed busing program would therefore replace several existing School trips with a single bus trip, resulting in decreases to certain traffic volumes at some of the study intersections even though the number of total students would increase from current levels.

Tables 2a and **2b** provide a summary of trips that would be generated by the Carpool/Busing Plan for the interim school. Trips are divided by the various peak hour periods as described above.

Table 2a
Interim Occupancy/Student Busing Program Trip Generation (AM – Pre-PM)

		AM Peak Hour (7:00-8:15)		Post AM Peak Hour		Pre PM Peak School Peak Hour	
Proposed Uses	**Daily**	**In**	**Out**	**In**	**Out**	**In**	**Out**
Faculty/Staff	142	59	12	0	0	0	0
Pre-School Students - Driven	208	0	0	52	52	52	52
Students - Carpool	64	16	16	0	0	0	0
Students – Bused	44	11	11	0	0	0	0
TOTAL	*458*	*86*	*39*	*52*	*52*	*52*	*52*

Source: Hirsch/Green March 2007

Table 2b
Interim Occupancy/Student Busing Program Trip Generation
(PM School Peak – PM Peak Hour)

Proposed Uses	PM School Peak School Hour (2:30 – 3:45)		Between PM School & PM Peak Hour		PM Peak Hour	
	In	Out	In	Out	In	Out
Faculty/Staff	4	18	6	29	2	12
Pre-School Students — Driven	0	0	0	0	0	0
Students — Carpool	13	13	2	2	1	1
Students — Bused	9	9	0	0	2	2
TOTAL	**26**	**40**	**8**	**31**	**5**	**15**

Source: Hirsch/Green March 2007

Summary of Traffic Analysis for Interim School

Project impacts were evaluated using the above criteria and assumptions. The results indicated that the proposed interim school's 390-student occupancy level, combined with a Carpool/Busing Plan and alternative access scenarios including either the One-Way Loop or the Mid-Block Access, would not produce any significant impacts at any of the five study intersections during any of the three peak analysis periods. As a result, the proposed interim School would not require any intersection mitigation improvements, thereby achieving the goals identified at the outset of this supplemental analysis.

By comparison, the originally-approved 750-student project would result in significant impacts during one or more of the peak periods at three of the study intersections, Driver Avenue/Palo Camodo Canyon Road at Canwood Street/Chesebro Road, Canwood Street/Palo Comado Canyon Road at the US 101 Northbound Ramps, and at Dorothy Drive and US 101 Southbound Freeway Ramps. **Table 3** provides a summary of the traffic generation impacts associated with both full enrollment of the School and the proposed interim/student busing program.

Table 3
Original Project vs. Interim School Traffic Generation (with Carpool/Busing Plan)

Proposed Use	Daily	School AM Peak Hour In	School AM Peak Hour Out	School PM Peak Hour In	School PM Peak Hour Out	PM Peak Hour In	PM Peak Hour Out
Full Enrollment	2,638	421	299	238	270	18	61
Interim Occupancy/Student Busing	458	138	91	26	40	13	46
Reduction Realized by Using Interim Occupancy/Student Busing Program	**-2,180**	**-283**	**-208**	**-212**	**-230**	**-5**	**-15**

Source: Hirsch/Green March 2007, Crain and Associates, 2005

It is also understood that although the proposed interim student busing program for the Heschel School would not result in any significant impacts to any of the study intersections based on the CMA analyses described above, incremental project trips would add to existing delays experienced at all of the study locations. These incremental project-related delays are anticipated to be nominal, however, in light of the substantially-reduced trip generation levels associated with the interim School, and are not considered to be significant. The potential for additional delay is noted in the original traffic analyses, and would be alleviated through installation of new traffic signals. However, the City of Agoura Hills has voiced objections to installation of traffic signals in the study area due to the rural nature of the vicinity, even though the original analyses indicated that many of the study intersections currently meet warrants for traffic signalization.

Analysis of Interim School Impacts to Neighborhood Streets

Results of the analysis of the proposed interim Heschel School operations indicated that no significant traffic impacts would be anticipated at any of the five study intersections. However, the potential for impacts to the local/residential streets surrounding the project site were also investigated, since the proposed One-Way Loop access plan would divert all of the School's "outbound" traffic to Chesebro Road. This would differ from the original project access scenarios which would have added little or no new trips to this particular roadway.

Impacts on local/neighborhood streets were based on daily (24-hour) traffic volumes along each street, rather than on the "peak hour" methodology used for the study intersection impact analyses. The approved Crain & Associates traffic study identified six local/neighborhood street segments surrounding the project site for detailed analyses. Using daily trip generation estimates and the revised, "One-Way Loop" access scenario project traffic distributions, the amount of daily project-related trips along each of

the studied local/neighborhood street segments was calculated. These "net" new project traffic volumes also accounted for the removal of approximately 135 daily trips along the Driver Avenue/Palo Comado Canyon Road corridor, as these student-related vehicle trips would be eliminated through their incorporation into the student busing program, or by the relocation of the existing student population from the Liberty Canyon site to the proposed new School location.

It should be noted that the Los Angeles County Department of Public Works, Traffic and Lighting Division, does not currently have in place any criteria for determining the significance of project traffic additions to low-volume residential streets. Therefore, significance criteria for assessing the project's traffic impact on local residential streets was based on criteria defined by the City of Los Angeles Department of Transportation (LADOT) Guidelines. The guidelines indicate that, for streets with less than 1,000 vehicles per day, a significant impact is defined as an increase of 16 percent or more in the total future daily traffic volumes (including ambient traffic growth, cumulative development traffic, and project-related trips) on the street. For roadways carrying between 1,000 and 2,000 daily trips, a significant impact would occur with an increase of 12 percent or more of the total future traffic on the street. For streets with between 2,000 and 3,000 daily trips, a 10 percent increase or more would result in a significant impact, and for roads with more than 3,000 daily trips, an 8 percent increase would be the threshold for determining a significant impact.

The net impacts of the proposed interim Heschel School (with a student busing program and either the One-Way Loop or Mid-Block Access scenario) on the surrounding local/neighborhood streets would be well below the generally recognized thresholds for significance. Additionally, implementation of the proposed interim student busing program would actually produce a net decrease in daily trips on some roadway segments in the project vicinity due to the elimination of the existing student trips. Furthermore, the impacts of the proposed interim student busing program would be far below those identified in the original traffic study, with the exception of the segment of Chesebro Road between the proposed project access, and Driver Avenue/Palo Comado Canyon Road. However, the impact to this segment of the roadway would be expected to be far less than the identified significance threshold, since the proposed One-Way Loop access operation would limit new project trips to Chesebro Road to outbound traffic only. Therefore, the proposed Carpool/Busing Plan would not be expected to produce any significant impacts to the local/neighborhood streets surrounding the project site and no mitigation measures would be warranted. **Table 4** provides a summary of projected impacts on local and neighborhood streets under the interim/student busing program.

Table 4
Local/Neighborhood Street Average Daily Traffic
(Future (2010) Without and With Interim/Student Busing Program)

Street/Segment	Without Project ADT	Net Project ADT (One-Way Loop/Mid-Block Access	With Project ADT (One-Way Loop/Mid-Block Access)	Project Impact (One-Way Loop/Mid-Block Access)	Significance Threshold	Significant Impact?
Driver Ave. W/o Chesebro Rd.	10,190	(53)/(53)	10,137/10,137	-0.5%/-0.5%	8.0%	No
Chesebro Rd. N/o Driver Ave.	1,770	229/0	1,999/1,770	11.5%/0.0%	12.0%	No
Palo Comado Cyn. Rd. E/o Chesebro Rd.	9,540	94/241	9,634/9,781	1.0%/2.5%	8.0%	No
Canwood St. S/o Driver Ave.	5,660	0	5,660/5,660	0.0%/0.0%	8.0%	No
Driver Ave. W/o Colodny Dr.	8,950	(53)/(53)	8,897/8,897	-0.6%/-0.6%	8.0%	No
Chesebro Rd. N/o Agoura Park	1,660	0	1,660/1,660	0.0%/0/0%	12.0%	No

Source: Hirsch/Green March 2007, June 2007
W/o = West of; E/o = East of; N/o = North of; S/o = South of.

Analysis of Interim School Impacts on Regional Transportation System

To address the increasing public concern that traffic congestion was impacting the quality of life and economic vitality of the State of California, the Los Angeles County CMP 3 was enacted to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. A Countywide approach has been established by the Metropolitan Transportation Authority, the local CMP agency, to implement the statutory requirements of the CMP. The Countywide approach includes designating a highway network that includes all state highways and principal arterials within the County and monitoring the network's Level of Service standards. The CMP project traffic impact analysis (TIA) guidelines require analyses of all CMP monitoring intersections where the project could add a total of 50 or more trips during either peak hour. Additionally, all freeway segments where a project could add 150 or more trips in either direction during the peak hours must be analyzed.

A detailed analysis of both the CMP arterial monitoring intersections and freeway segments applicable to the project vicinity is included in the approved project's traffic study and EIR (2005). Those analyses concluded that no significant traffic impacts would result from the full-enrollment project (750 students) at any arterial monitoring intersection or freeway segment. Since the proposed interim student busing program and reduced enrollment limits result is a substantial decrease in both daily and peak hour traffic volumes for the School, no significant impacts from this less intensive interim condition are anticipated, and no further CMP analyses are warranted.

Analysis of Future (2010) Cumulative Impacts

While the analyses for the interim student busing program and reduced enrollment demonstrated that the proposed Heschel School Interim One-Way Access Loop/Student Busing Program itself would not result in significant traffic impacts to any of the area study intersections or local/residential streets, it would add incrementally to anticipated future traffic growth in the vicinity. This would include both "localized" traffic increases resulting from the ongoing development of other projects within the immediate study area, including projects within Los Angeles County and the City of Agoura Hills, as well as "pass through" or commuter traffic resulting from more distant development.

The forecast "Future (2010) Without Project" conditions already account for anticipated "ambient" traffic growth potential in the study area. This traffic would result from increases in traffic produced by already existing development (due to additional or new vehicles within existing households, business expansion, etc.), or from developments that are not yet proposed or are outside the study area. However, additional traffic would also be anticipated from a number of specific new developments within the study area that are either proposed, approved but not yet under development, or are currently under construction.

2.4 VEHICLE TRIP MONITORING PROGRAM

This vehicle trip monitoring program has been developed to ensure that the proposed Interim School (i.e., 390 students) Carpool/Busing Program will adhere to the respective vehicle trip limits, and will not exceed traffic impacts attributable to the project on streets in the surrounding area. This program is part of the project's broader CEQA mitigation monitoring and reporting program (MMRP). The School will be responsible for all costs associated with program implementation, reporting, and monitoring.

- The County or a County-approved traffic consultant shall conduct monthly traffic counts at the entrance(s) and exit(s) of the School to evaluate whether the School is in compliance with the allowable peak-hour and daily vehicle trips summarized in the table below:

Peak Hours	Inbound Vehicle Trips	Outbound Vehicle Trips	Total Vehicle Trips
AM Peak Hour (7 AM –8:15 AM)	86	39	125
Post AM Peak Hour (8:45 AM –9:45 AM)	52	52	104
Total AM Peak Hours (7 AM –9:45 AM)	138	91	229
Pre-PM School Peak Hour (1:15 PM–2:30 PM)	52	52	104
PM School Peak Hour (2:30 PM –3:45 PM)	26	40	66
Pre-PM Peak Hour (3:45 PM –4:30 PM)	8	31	39
PM Peak Hour (4:30 PM –5:45 PM)	5	15	20
Total PM Peak Hours (1:15 PM –5:45 PM)	91	138	229
Total Trips	229	229	458

- Without the need to notify the school, the County or the designated consultant will select three consecutive midweek days (Tuesday-Wednesday-Thursday) during no-holiday weeks each month to monitor both inbound and outbound traffic at the entrance(s) and exit(s) of the School. This routine monthly monitoring is the "Tier One Count."

- The Tier One Count monitoring records will include at least the arrival and departure time of each vehicle. These data will be analyzed and compared to the maximum allowable number of vehicle trips for each time periods as specified in the table above. The monthly evaluation including all original monitoring records of that month shall be sent to the School and to the City of Agoura Hills no later than 10 working days after the traffic count is performed.

- If a Tier One Count exceeds the maximum allowable peak-hour or daily vehicle trips, a follow-up traffic count (i.e., Tier Two Count) shall be performed within 15 days of the Tier One Count, to verify the violations.

- If a Tier Two Count reveals non-compliance with the maximum allowable peak-hour or daily vehicle trips, the School will be subject to a fine of $100 for each vehicle trip that exceeds a maximum allowable peak-hour or daily trip limit. The School will continue to be subject to semi-monthly Tier Two Counts and applicable fines unless and until the School demonstrates compliance with the maximum allowable peak-hour or daily vehicle trips.

- The above fines shall be placed into a trust account maintained by the County Department of Public Works and used only for traffic or pedestrian enhancements on public road right of ways within a

0.5-mile radius of the project boundary. Said fines shall be in addition to other fines or fees assessed through other code enforcement provisions either in this permit or other County codes;

- At the end of any Fall semester where there have been four or more confirmed Tier One Count violations or two or more confirmed Tier Two Count violations, the maximum permitted student enrollment will be reduced for the following school year according to the following formula: the number by which student enrollment is to be reduced = (the average number of one-way, daily trips exceeding the number of allowed daily trips) × 2.5 students/vehicle (which is the average number of students per vehicle).

- The School shall submit a detailed transportation management program to the County Department of Public Works for review and approval at least 30 days prior to the start of each school year. The program shall include but not be limited to:

(1) Number of faculty/staff and students by grade levels for the upcoming year;

(2) An assessment of the anticipated School trip generation levels and associated carpool vehicle occupancy levels necessary to achieve consistency with the allowed number of vehicle trips; and

(3) Annual school calendar indicating school holidays and special events.

No traffic counts will require any vehicles to stop at project gates. Therefore, the trip monitoring program itself will not impede school operation and cause back-up traffics onto public roadways.

The School shall provide traffic control officers at critical site access locations and key intersections during Special Event activities, to direct traffic in and out of the School site to reduce potential traffic delays during the peak arrival and/or departure periods. The School shall also provide traffic control officers during the first few days of each School semester, to ensure that traffic to and from the School operates in a manner consistent with the proposed Carpool/Busing Program, and to minimize the potential for any unforeseen traffic problems to occur during the Carpool/Busing Program's "start up" period.

2.5 CONCLUSION

Analysis of the proposed interim (390-student) Heschel School operations indicates that, even without the "ultimate" traffic and access improvements being considered by Caltrans, the School can operate without causing any significant traffic impacts at any of the five study intersections, provided that an aggressive student carpooling/busing program is used in combination with either the One-Way Loop or the Mid-Block Access scenarios for vehicular access to the campus. The net impacts of the proposed interim Heschel School (with carpooling/busing and either the One-Way Loop or the Mid-Block Access) would also be well below the generally recognized thresholds for significance for impacts on any arterial monitoring intersection or freeway segment, or neighborhood streets.

3 AIR QUALITY

The following estimates of daily mobile source emissions generated from the operation of Heschel Day School West are based upon the estimated number and length of vehicle trips identified in Table 1 of **Appendix A.**[1] Specifically, Table 1 of **Appendix A** estimates the number of daily vehicle trips for faculty/staff and students, and Figure C-1 of **Appendix A** provides distance isopleths (lines of equal distance) from the school to the approximate student residences. The isopleths in Figure C-1 are shown in 1-mile intervals. Student residences located between two given isopleths were assumed to travel the greater of the two distances to reach the school (e.g., a student living at a residence located between the 2-mile and 3-mile isopleths was assumed to travel 3 miles to reach school). In addition, residences that were located on an actual isopleth were assumed to travel the farther distance. A table of the ranges of distances from the school and the corresponding number of residences is provided in **Appendix E.**

Preschool and carpooling students were assumed to be dropped off and picked up from the school by a parent or guardian each day. The average distance a preschool student vehicle or carpool vehicle would travel to reach the school was calculated by taking the weighted average of all the travel distances for every residence in Figure C-1 of **Appendix A.** The resultant distance, 5.3 miles, represents a direct distance from the students' residences to the school. Therefore, to account for the variability in actual travel on local roads, the average distance was multiplied by a factor of 1.25. The adjusted distance, 6.6 miles, was used as the one-way trip length for preschool and carpool trips.

A portion of the Heschel Day School West students would ride the bus as part of the proposed Carpool/Busing Plan. A bus was assumed to travel to and from the outlying areas to transport the students to the school. The one-way bus trip length was assumed to be the maximum distance from a residence to the school, as identified in the above-referenced Figure C-1. However, because the students farthest away from the school would likely walk to a common bus pick up location, the "maximum" distance was calculated by taking the average travel distance for residents greater than 10 miles away from the school. The resulting distance, 12 miles, was multiplied by a factor of 1.5 to account for the variability in the bus route on local roads. The adjusted distance, 18.0 miles, was used as the one-way trip length for the bus route.

A typical day of operation would also involve faculty/staff members commuting to the school. The location and distribution of faculty/staff homes is not known. For the purposes of this analysis, the urban home-to-work distance in the South Coast Air Basin (SCAB) from URBEMIS2002 Version 8.7.0, a land use

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1 Hirsch/Green Transportation Consulting, Inc. *Traffic Impact Analysis Report, Abraham Joshua Heschel Day School Project, Proposed Interim School Student Carpool/Busing Plan,* March 2007.

and air emission estimation program, was used to represent the faculty/staff travel distance. This distance is 11.5 miles.

The daily trips associated with the operation of the Proposed Interim School, obtained from Table 1 of **Appendix A**, and the estimated trip lengths are shown below in **Table 5**.

Table 5
Proposed Interim School Daily Trips

Trip Generation/Number of Riders	Vehicles Driven	Trips Per Vehicle	Total Trips	Trip Length (miles)	Total Distance (miles)
Faculty/Staff (71 faculty/staff)[1]	71	2	142	11.5	1,633.0
Preschool Students (138 students)[2]	52	4	208	6.6	1,372.8
Carpool Students (40 students)[3]	16	4	64	6.6	422. 4
20-Student Bus (30 students)[4]	2	4	8	18.0	144.0
40-Student Bus (182 students)[5]	6	4	24	18.0	432.0

Source: Hirsch/Green Transportation Consulting Inc., March 2007

[1] *Assumes all faculty and staff drive alone*

[2] *Assumes 2.65 students per vehicle driven.*

[3] *Assumes 2.5 students per vehicle driven.*

[4] *Assumes 20 students per bus at 75 percent occupancy.*

[5] *Assumes 40 students per bus at 75 percent occupancy.*

Note: The traffic report assumes 20-student bus and 40-student bus have passenger car equivalency (PCE) of 1.0 and 1.5, respectively. Trips shown above represent actual trips without PCE conversion.

Emission factors for vehicles associated with the Proposed Interim School's daily operations were derived using the California Air Resources Board's (ARB) motor vehicle emissions inventory program, EMFAC2007. Vehicles used for carpooling, preschool students, or faculty/staff were assumed to be a mix of the light-duty automobile (LDA) and light-duty truck (LDT) categories from EMFAC2007's array of vehicle classes. Both the 20-student and 40-student school buses were represented as the School Bus (SBUS) category in EMFAC2007. An inventory of pollutant emissions corresponding to LDA, LDT, and SBUS estimated to be operating in Los Angeles County in the operational year 2010 was generated using EMFAC2007.[2] EMFAC2007 also can generate total vehicle miles traveled (VMT) for a specific vehicle class in a given county or air basin. The total emissions for a given pollutant were divided by the total VMT to generate an emission factor expressed in grams per mile. The pollutant emissions inventory and corresponding VMT for LDA and LDT vehicles were combined to generate a composite emission factor for LDA/LDT vehicles. Mobile source emissions generated from the daily operation of the school were

[2] Some of the trips would be generated from locations in Ventura County; however, the motor vehicle emission factors for Ventura County were not expected to be substantially different from those in Los Angeles County.

calculated by multiplying the total VMT (i.e., total trips × trip distance) by the appropriate emission factor to obtain emissions in grams per day. Emissions were then converted to pounds per day. **Table 6** presents the mobile source emissions from the original EIR for the Heschel Day School project at full buildout and compares them to the mobile source emissions with implementation of the Proposed Interim School Carpool/Busing Plan. The calculations which form the bases for this comparison are attached hereto as **Appendix F.**

Table 6
Heschel Day School West Mobile Source Emissions Comparison

	Maximum Daily Emissions (lbs/day)				
Emissions Source	**VOC**	**NO_x**	**CO**	**SO_x**	**PM_{10}**
Original Mobile Source Emissions (without busing/carpooling program)	36.05	28.77	312.87	0.24	22.40
Interim Mobile Source Emissions (with busing/carpooling program)	2.29	16.72	38.84	0.05	0.64
SCAQMD Thresholds	55	55	550	150	150
Exceeds Thresholds?	NO	NO	NO	NO	NO
Reduction in Emissions	(33.76)	(12.05)	(274.03)	(0.19)	(21.76)

Source: Impact Sciences, Inc.
Negative values are shown in parentheses.

The original daily operational emissions (i.e., area and mobile source) would not exceed the SCAQMD's significance thresholds without the Proposed Interim School Student Carpool/Busing Plan. With the introduction of the Proposed Interim School Student Carpool/Busing Plan, mobile source emissions are further reduced and total operational emissions will remain below the significance thresholds.

4 NOISE

4.1. STATIONARY NOISE

On-site stationary noise sources associated with project operation would occur primarily from children playing, talking, and yelling, school bells/buzzers, and normal parking lot activity. Noise would also be a factor during school functions and cultural events on the school campus. Noise levels associated with point source activities are subject to County regulations and are anticipated to be well below the requirements of the Los Angeles County Noise Ordinance (i.e., cumulative noise levels for any hour would be less than 30 minutes). The project design incorporates several features that serve to attenuate noise during Project operation including:

- Clustering structures in the low-lying central portion of the property, which creates an open space buffer to separate project uses from nearby noise sensitive receptors and minimizes freeway noise experienced at the future campus.
- Placing athletic fields and ball courts in the far interior of the project site, away from noise-sensitive receptors.
- Athletic fields and ball courts do not contain lighting, which effectively prevents noise from nighttime athletic activities.
- A landscape berm and low wall will separate parking facilities from nearby residential uses.

In addition to the above design features, the following mitigation measures are recommended by the EIR:

- All stationary and point sources of noise (e.g., bells amplified sound, etc.) occurring on the project site shall adhere to the requirements of the County of Los Angeles Ordinance No. 11743, Section 12.08.390.
- No amplified sound shall be generated between the hours of 8:00 PM and 8:00 AM. All school bells shall be oriented away from adjacent residential areas.

Furthermore, the Conditional Use Permit (CUP 98-062-(3)) for the proposed Project further regulates impacts associated with noise on site. Specific conditions pertaining to noise include:

- **Condition 30bb:** Requires the area surrounding the project site to be shielded with buffers and landscaped to minimize noise and visual intrusion.
- **Condition 30k:** Places an annual limit on the number of events at which attendance exceeds 150 persons or requires more than 223 parking spaces.
- **Condition 30l:** Requires preparation of a special events access and parking management plan.

- **Condition 30m:** Requires the applicant to obtain a Temporary Use Permit from the Department of Regional Planning when an event is predicted to generate the need for more parking than the 400 spaces (permanent and temporary) available on the project site.

- **Condition 30o:** Prohibits interscholastic athletic events after dark.

- **Conditions 30p–30q:** Place restrictions on the number and timing of special events. These conditions require the Director of Planning to coordinate with the City of Agoura Hills and the permittee to advertise the event in the local newspaper for public disclosure purposes prior to issuance of a Temporary Use Permit.

4.2. TRAFFIC VOLUME NOISE

Based on the trip volumes identified in **Appendices A** and **B**, the Traffic Impact Analyses prepared by Hirsch/Green Transportation Consulting, noise modeling was conducted to determine whether implementation of the proposed Carpool/Busing Plan would alter the conclusions regarding mobile-source noise in the EIR. In order to evaluate noise generated by automobile and bus traffic, the Federal Highway Administration (FHWA) noise model was used to calculate potential noise impacts on study roadway segments. Future noise levels were calculated for the **With Project** and **With Project plus Carpool/Busing Program**. The results of the noise modeling are shown in **Table 7**. The calculations which form the bases of the above-referenced noise modeling are attached hereto as **Appendix G**.

Table 7
Predicted Future Off-Site Roadway Noise Levels at Noise Sensitive Locations
with and without Carpool/Bus Program

Roadway Segment	Sensitive Land Uses Adjacent to Roadway	Future with Project CNEL	Future Project with Carpool/ Busing Program CNEL	Change in CNEL
Chesebro Road N/o Palo Comado/Driver	Residential	56.7	57.1	+0.40
Driver Avenue W/o Chesebro Road	Residential, Preschool	64.4	64.2	-0.2
Driver Avenue W/o Colodny Drive	Residential	63.9	63.6	-0.30
Canwood Street S/o Drive Avenue	Residential, Preschool	62.3	62.2	-0.10
Palo Comado Cyn. Rd. E/o Chesebro Rd.	Residential	63.9	64	+0.10
Chesebro Rd. N/o Agoura Park	Residential	56.3	56.3	0

As shown in **Table 7,** three roadways (Driver Ave. W/o Chesebro Rd., Driver Ave. W/o Colodny Dr., and Canwood Street S/o Driver Ave.) experience a decrease in noise, ranging from 0.1 to 0.3 decibels as measured on an A-weighted scale (dB(A)), with implementation of a carpool/busing program. Two roadways (Chesebro Road N/o Palo Comado and Palo Comado Cyn. Rd. E/o Chesebro Rd.), show an increase in noise ranging from 0.1 to 0.4 dB(A). An increase in noise level of less than 3 dB(A) is not typically noticed by the human ear.[3]

In conclusion, implementation of the Proposed Interim School Carpool/Busing Program would not increase the severity of an existing impact nor create a new impact not previously disclosed in the EIR.

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3 U.S. Department of Housing and Urban Development. *The Noise Guidebook*, 1985.

APPENDIX A

Traffic Impact Analysis, Proposed Interim School, One-Way Loop

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

DONALD L. WOLFE, Director

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

May 14, 2007

IN REPLY PLEASE
REFER TO FILE: T-4

Mr. Ronald Hirsch
Hirsch/Green Transportation Consulting, Inc.
578 Washington Boulevard, No. 360
Marina del Rey, CA 90292

Dear Mr. Hirsch:

HESCHEL SCHOOL
CONDITIONAL USE PERMIT 98062
INTERIM SCHOOL STUDENT CARPOOL/BUSING PLAN
TRAFFIC IMPACT ANALYSIS (MARCH 2007)
AGOURA HILLS AREA

The proposed project is located just east of Palo Comado Canyon Road between Chesebro Road and the Ventura (US-101) Freeway in the unincorporated County of Los Angeles area of Agoura Hills.

In June 2006, the Regional Planning Commission (RPC) approved Conditional Use Permit 98-062 for the development of the 164,850-square-foot Heschel School. The maximum enrollment for the school was 750 pre-kindergarten through eighth grade students. The RPCs decision was then appealed to the Board of Supervisors. On January 23, 2007, after hearing testimony from the project appellants and interested parties, the Board put forth a motion that required the project applicant to develop an interim traffic plan for a maximum enrollment of 390 students that fully mitigates all of the project's traffic impacts, provides an enhanced measurable and enforceable busing and/or carpool program, and includes an evaluation of alternative access routes including but not limited to one-way ingress at Canwood Street, and one-way egress at Chesebro Road. Under the interim plan, the school would construct Phase I of the school while concurrently implementing the traffic mitigation and access improvements.

We reviewed the interim school student carpool/busing plan and find that it incorporates all of the required elements of the Board's motion. In addition, we agree with the plan that the traffic generated by the proposed interim project will not result in a significant impact at any of the surrounding roadways or intersections. We further agree with the plan that the cumulative traffic generated by the proposed interim project and other

proposed projects in the area will result in a significant impact at the following City of Agoura Hills intersections. The project shall be responsible for paying its pro-rata share of the following mitigation measures to the City of Agoura Hills prior to issuance of building permits for Phase I. Since the proposed busing/carpool plan is intended as an interim measure, the mitigation measures are the same as those included in the approved project final environmental impact report.

Canwood Street and Chesebro at Driver Avenue and Palo Comado Canyon Road

The project's cumulative traffic impact may be mitigated through the payment of a pro-rata share towards the cost of either installing a traffic signal or modifying the intersection lane configuration as follows:

West approach: An exclusive left-turn lane, one through lane, and one shared through/right-turn lane instead of one shared through/left-/right-turn lane.

North approach: An exclusive left-turn lane, one shared through/right-turn lane instead of one shared left-turn/through lane and a free right-turn lane.

Palo Comado Canyon Road at US-101 Freeway Westbound Ramps

No additional improvements are necessary under the roundabout access alternative at this location to mitigate the cumulative impact. However, if the traffic signal access alternative is selected, the following additional improvements are required.

North approach: One left-turn lane, one through lane, and one shared through/right-turn lane instead of one shared left-turn/through lane.

South approach: One left-turn lane, one through lane, and one shared through/right-turn lane instead of one shared left-turn/through lane.

This ultimate improvement would require the existing two-lane bridge crossing the US-101 to be widened to its full width and the project shall pay its pro-rata share toward the implementation of this regional transportation improvement.

Chesebro Road at Palo Comado Canyon Road

The project's cumulative traffic impact may be mitigated through the payment of a 25 percent pro-rata share towards the cost of installing a traffic signal at this intersection.

Chesebro Road and Laura La Plante Drive at Agoura Road

The project's cumulative traffic impact may be mitigated through the payment of a 25 percent pro-rata share towards the cost of installing a traffic signal at this intersection.

The project shall be solely responsible for installing all project access and mitigation measures prior to issuance of building permits for Phase II.

In order to verify the school's compliance with the interim student carpool/busing plan, the County will monitor the vehicle trips to and from the school. The school shall not exceed the following vehicle trips caps for any of the peak hours or the cumulative totals of the AM or PM peak hours. The County's cost of monitoring and reporting, as well as the cost of the traffic counts including any County selected equipment are the sole responsibility of the applicant. The remaining details of the monitoring program are noted in the plan.

Peak Hours	Inbound Vehicle Trips	Outbound Vehicle Trips	Total Vehicle Trips
AM Peak Hour (7 a.m. – 8:15 a.m.)	86	39	125
Post AM Peak Hour (8:45 a.m. – 9:45 a.m.)	52	52	104
Total AM Peak Hours (7 a.m. – 9:45 a.m.)	138	91	229
Pre-PM School Peak Hour (1:15 p.m. – 2:30 p.m.)	52	52	104
PM School Peak Hour (2:30 p.m. – 3:45 p.m.)	26	40	66
Pre-PM Peak Hour (3:45 p.m. – 4:30 p.m.)	8	31	39
PM Peak Hour (4:30 p.m. – 5:45 p.m.)	5	15	20
Total PM Peak Hours (1:15 p.m. – 5:45 p.m.)	91	138	229
Total trips	229	229	458

The interim project shall also limit the number of vehicle trips for school evening and weekend special events to 356 trips and notify the City of Agoura Hills in advance of larger events.

If you have any questions regarding any of the above, please contact Mr. Patrick Arakawa of our Traffic Studies Section at (626) 300-4867.

Very truly yours,

DONALD L. WOLFE
Director of Public Works

William Winter

WILLIAM J. WINTER
Assistant Deputy Director
Traffic and Lighting Division

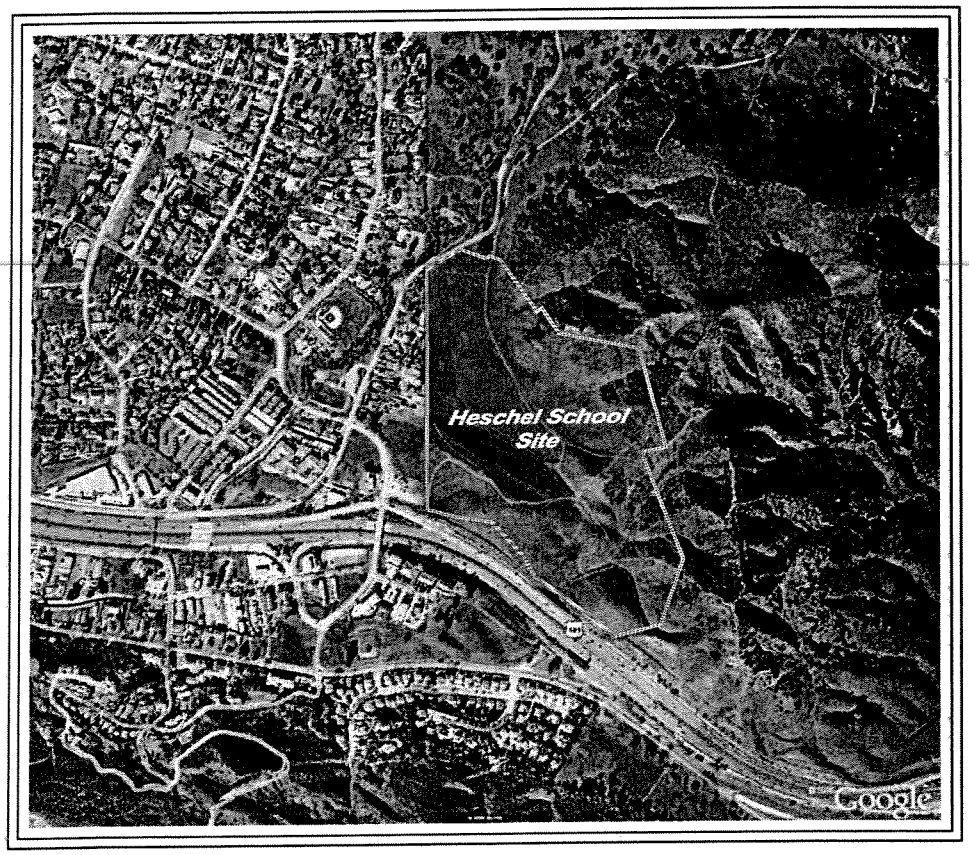
PA:cn
P:\TLPUB\WPFILES\FILES\STU\Pat\Heschel Interim Student Carpooling-busing Plan TS Mar 07

cc: Department of Regional Planning (Kim Szlay)

bc: Land Development (Hunter, Witler)

TRAFFIC IMPACT ANALYSIS REPORT

Abraham Joshua Heschel Day School Project
Near Agoura Hills, California
Proposed Interim School Student Carpool/Busing Plan



Prepared for:

Abraham Joshua Heschel West Day School
27400 West Canwood Street
Agoura Hills, California 91301

Prepared by:

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.
578 Washington Boulevard, #360
Marina del Rey, California 90292

REVISED MARCH 2007

EXECUTIVE SUMMARY

Pursuant to direction given by the Los Angeles County Board of Supervisors, this report documents the results of a traffic impact analysis of the potential trip generation and traffic impacts of a one-way site access and student busing program for the recently approved Heschel School project in Los Angeles County adjacent to the City of Agoura Hills. This analysis is designed to supplement the extensive traffic impact analyses contained in the project's approved traffic study, and Draft and Final EIR documentation.

The direction by the Board of Supervisors is based on their assessment of the potential timelines involved in implementation of the project's "final" traffic and access mitigation measures, as identified in the EIR. However, based on meetings and discussions with the California Department of Transportation (Caltrans), during which the agency formally identified its requirements regarding the design, review, and approval of the recommended mitigation improvements under its jurisdiction, the timing of the installation of some of the permanent intersection mitigation improvements will likely not be able to occur until well beyond the School's desired occupancy date for the new facilities.

Therefore, in recognition of these conditions and situations, and in order that the School may occupy its site once development/construction of the approved facilities are completed, the Board of Supervisors has proposed that the Heschel School identify and implement an interim School occupancy program, potentially using an aggressive busing/carpooling program and alternative site access routes, to support a reduced-enrollment 390-student campus until such time as the final traffic and access improvements can be selected and implemented.

Based on input on potential interim School operations from the Heschel School management, and pursuant to requirements of both the Los Angeles County Regional Planning Department and the Department of Public Works, a preliminary transportation demand management program was identified for the School which would include a revised School access scenario and an aggressive student carpool/busing program. The revised access scenario would consist of a "one-way loop" configuration, with all inbound School traffic accessing the School site via the main entrance from Canwood Street (east of Palo Comado Canyon Road), and all outbound traffic exiting the site via the "emergency access road" to Chesebro Road, north of Driver Avenue/Palo Comado Canyon Road. This access scheme will be in effect only until such time as the permanent project mitigation measures can be implemented.

An interim student busing program was also identified to reduce School traffic during the interim operations period. This program includes both minimum vehicle occupancy requirements and time-restricted access to and from the School site for both faculty/staff and student-related vehicles. The preliminary program envisions that most of the students will be bused to and from the School, although some flexibility exists for limited carpooling of students. School faculty and staff are not included in the student busing program, and are assumed to drive independently to provide scheduling flexibility for teachers, administrators, and other personnel involved in the School's operation. This program identifies the amount of "allowable" School-related traffic, including both inbound and outbound trips, during several critical traffic periods. The School will be required to provide detailed monitoring reports periodically to the Regional Planning Department and/or Department of Public Works to document the compliance with the conditions and requirements of the final carpool/busing program. Note that, prior to occupancy of the interim School, a detailed and specific carpool/bus plan, based on the specific School enrollment and faculty/staff and student enrollment information at the time of occupancy, will be prepared and submitted to the Director of Planning and the Department of Public Works for review and approval.

The results of the analyses contained in this report indicate that the proposed interim School project can feasibly implement the carpool/busing program described, and that with such a program in place, including the revised "one-way loop" interim access scheme, the School will not significantly impact any of the intersections in the project vicinity. Additionally, no impacts to the nearby residential streets are anticipated, and the project will not result in sufficient new traffic to significantly impact any of the Los Angeles County Congestion Management Program (CMP) arterial monitoring intersections or freeway segments in the project vicinity. Therefore, the proposed interim operations of the Heschel School will not result in any significant traffic impacts in the study area, and traffic mitigation measures are warranted.

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INTRODUCTION

Pursuant to direction given by the Los Angeles County Board of Supervisors at their January 23, 2007 hearing, this report documents the results of a traffic impact analysis of the potential trip generation and traffic impacts of a one-way site access and student busing program for the Heschel School project in Los Angeles County adjacent to the City of Agoura Hills. The project site and surrounding vicinity are shown in Figure 1. This analysis is designed to supplement the extensive traffic impact analyses contained in the project's approved traffic study, and Draft and Final EIR documentation.

The direction by the Board of Supervisors is based on their assessment of the potential timelines involved in implementation of the project's "final" traffic and access mitigation measures, as identified in the EIR. However, based on meetings and discussions with the California Department of Transportation (Caltrans), during which the agency formally identified its requirements regarding the design, review, and approval of the recommended mitigation improvements at the project access location of Palo Comado Canyon Road and US-101 Northbound On and Off-Ramps/Canwood Street, Caltrans indicated that it would require the evaluation and comparison of two potential improvements at the site access intersection: a "roundabout" design suggested by the agency itself, and an alternative traffic signal improvement using the existing intersection geometries. The evaluation of both improvement options requires the preparation of a detailed Project Report/Project Study Report (PR/PSR), which can be a lengthy and analysis-intensive process. As a result of this requirement, coupled with the ongoing concerns by the City of Agoura Hills regarding potential School traffic impacts and mitigation measures, the timing of the installation of any of the identified permanent intersection mitigation improvements will likely not be able to occur until well beyond the School's desired occupancy date for its new facilities.

Therefore, in recognition of these conditions and situations, and in order that the School may occupy its site once development/construction of the approved facilities are completed, the Board of Supervisors has proposed that the Heschel School identify and implement an interim School occupancy program, potentially using an aggressive busing/carpooling program and alternative site access routes, to support a reduced-enrollment 390-student campus until such time as the final traffic and access improvements can be identified and implemented.

HESCHEL SCHOOL - ALT ACCESS ANALYSIS \ VICINITY-1

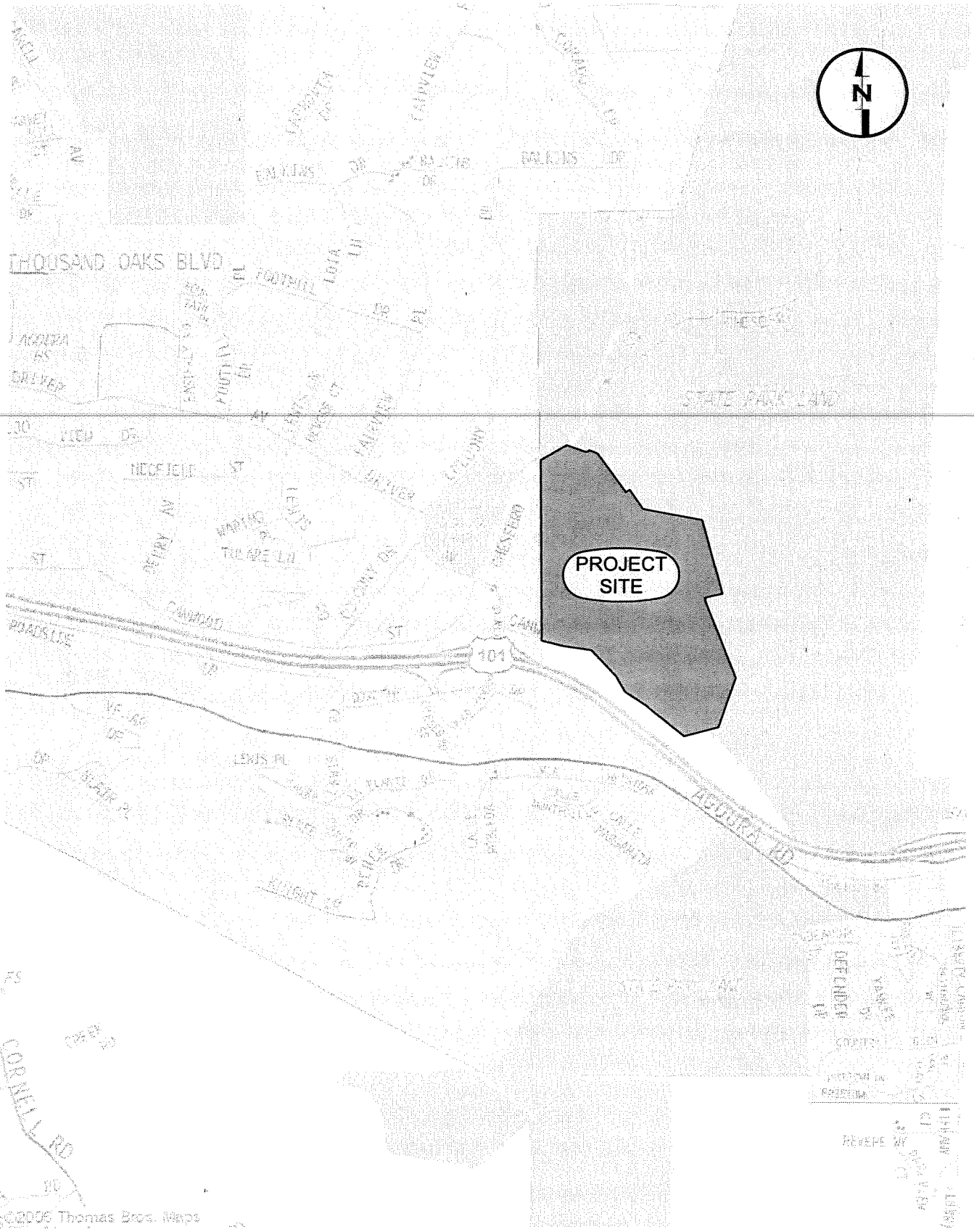

FIGURE 1

2/26/2007

HIRSCH GREEN
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PROJECT SITE VICINITY

This report summarizes the results of a traffic impact analysis of options for site access that would allow the interim occupancy of the school for up to 390 of the total 750 students without creating significant traffic impacts to the surrounding area. This strategy was adopted to address the Board's intent, based on the testimony and discussion at the January 23rd hearing, to first, identify alternative access and/or student transportation options would permit the school to operate at an acceptable operational level during the Caltrans/Los Angeles County/City of Agoura Hills mitigation improvement analysis and approval process, and second, provide an interim School occupancy program that would minimize traffic additions and impacts to the surrounding community and would not require the installation of any substantial roadway improvements, thereby avoiding the potentially time-consuming tasks associated with mitigation design, review, approval, and implementation of roadway improvements that would unnecessarily further delay occupancy of the School in the short term.

Hirsch/Green Transportation Consulting, Inc. ("Hirsch/Green") was retained to identify a potential alternative access/student busing program consistent with the direction identified by the Board, and study the potential traffic impacts of such a program on the surrounding street system. The parameters of this study were discussed with Los Angeles County Department of Public Works to ensure that appropriate analysis methodologies and assumptions were utilized. Based on those discussions, this study is based on data and assumptions contained in the approved traffic study prepared for the Heschel School (Crain & Associates, Revised February 2005), although this supplemental analysis focuses primarily on the forecast future (year 2010) traffic conditions at the five area intersections identified in those analyses. These intersections, listed below, represent the locations most likely to be affected by traffic generated by the proposed student busing program.

1. Canwood Street/Chesebro Road at Driver Avenue/Palo Comado Canyon Road
2. Palo Comado Canyon Road at US-101 Freeway Northbound On/Off-Ramps
3. Chesebro Road/US-101 Freeway Southbound On/Off-Ramps at Dorothy Drive
4. Chesebro Road and Palo Comado Canyon Road at Chesebro Road
5. Chesebro Road and Laura La Plante Drive at Agoura Road

In addition to these intersections, traffic conditions and potential project traffic impacts on several residential streets providing access to the project vicinity were also evaluated, including Driver Avenue, Chesebro Road, Palo Comado Canyon Road, and Canwood Street. The locations of the study intersections and street segments are shown in Figure 2.

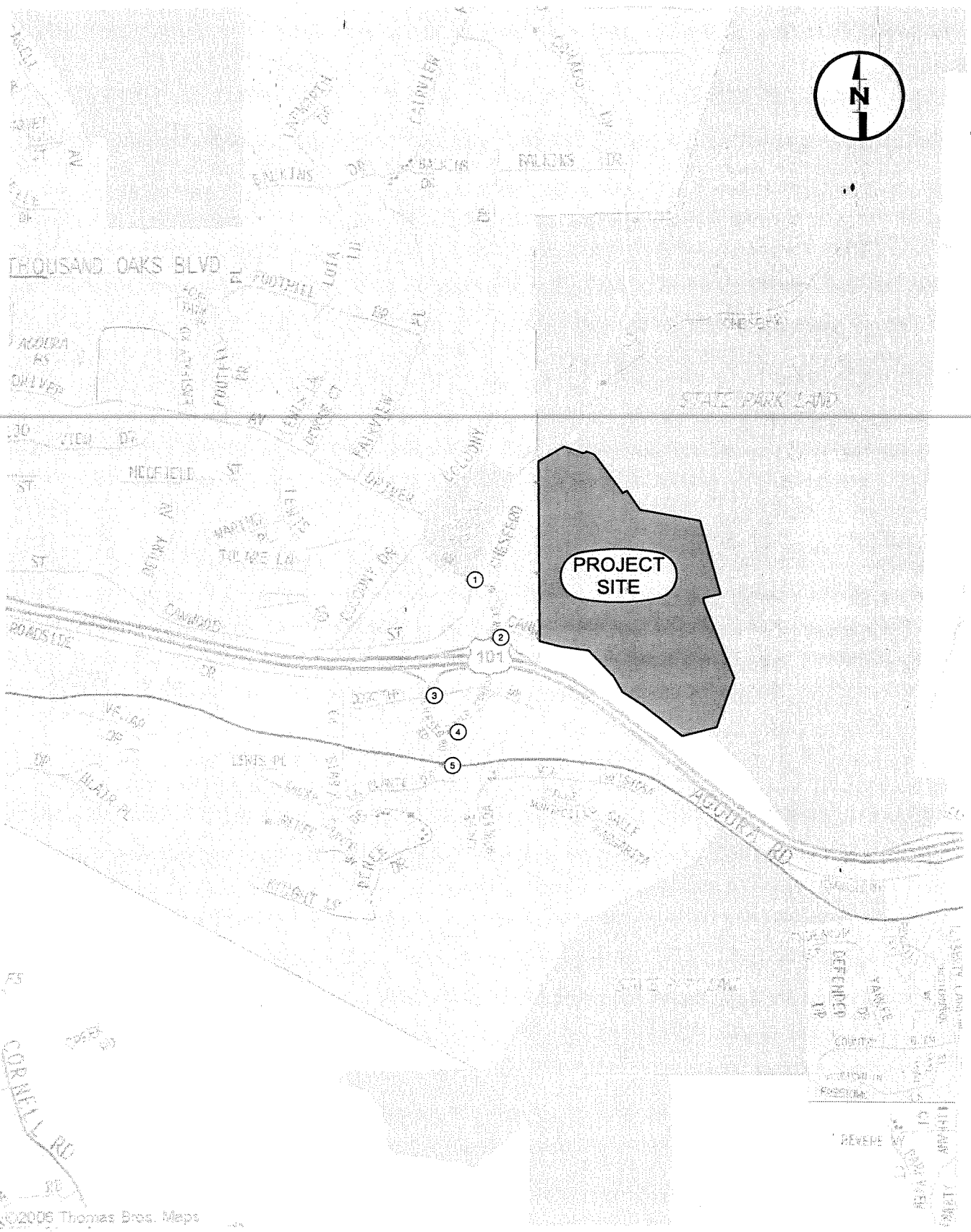

FIGURE 2

PROJECT STUDY INTERSECTIONS

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2/26/2007

PROJECT DESCRIPTION – APPROVED vs. INTERIM SCENARIO

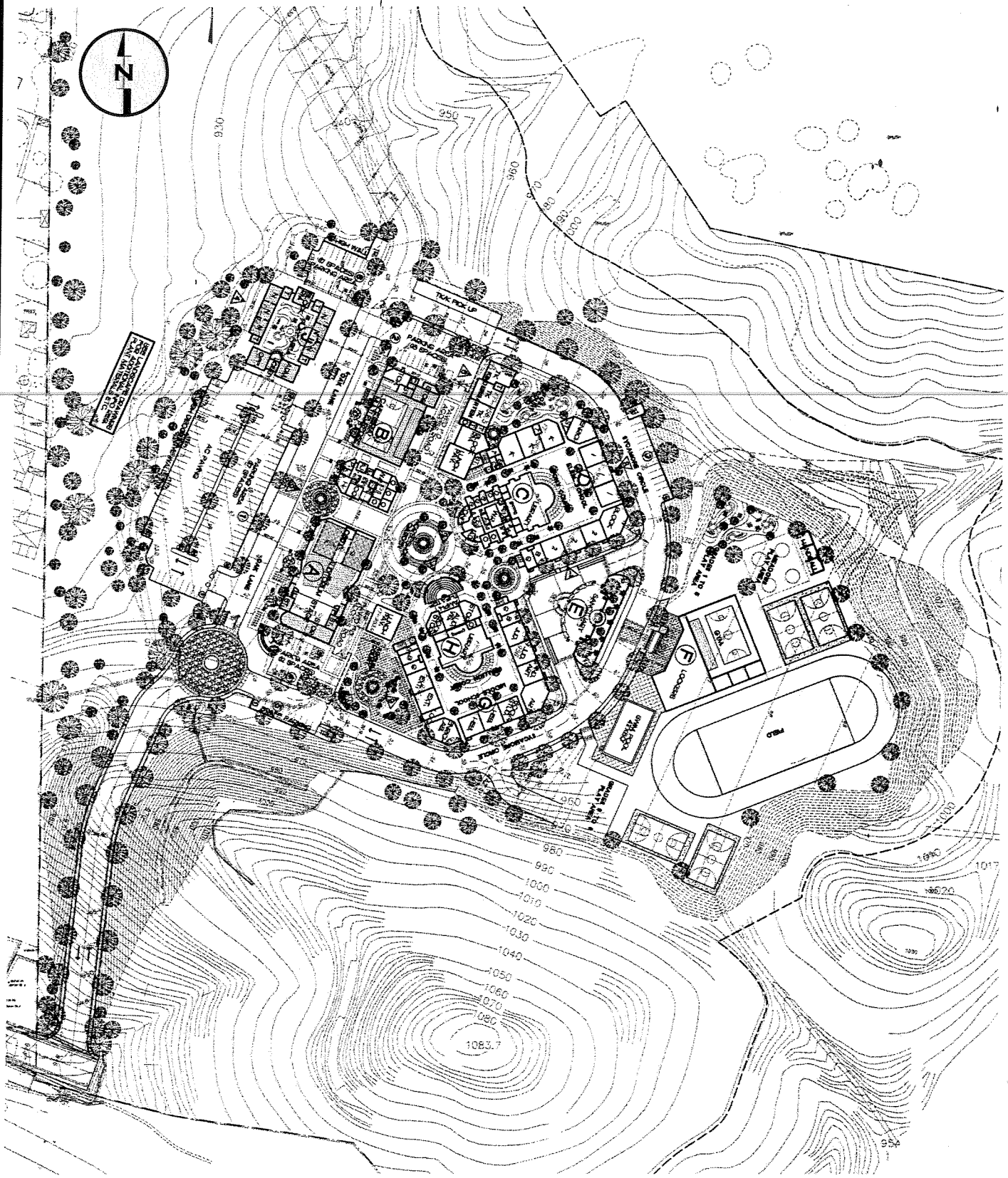
Regional Planning Commission Approved Project

As described in detail in the approved project traffic study (Crain & Associates, Revised February 2005), the originally-analyzed Heschel School proposal would develop a new, approximately 750-student (660-students in grades K-8, and 90 pre-school students) Jewish day school to be constructed at the subject site. Upon completion of the proposed School campus, the existing Heschel School campus, located at 27400 West Canwood Street, will be vacated, and all operations, faculty and staff, and student population relocated to the new site.

As approved by the Los Angeles County Regional Planning Commission ("RPC"), the project will provide separate pre-school, kindergarten, elementary and middle school facilities, including two library buildings, an auditorium, a multipurpose/cafeteria area, and a gym including separate boys' and girls' locker rooms. Surrounding these buildings, an athletic field, garden, play areas, tennis courts, and a pool are also planned for construction. The approved Heschel School project site layout is shown in Figure 3.

Parking for the project will be provided by a total of approximately 223 parking spaces located within several surface parking lots. Access to the parking areas and the school will be provided via a new driveway located near the eastern terminus of Canwood Street, east of its intersection with Palo Comado Canyon Road. This portion of Canwood Street is discontinuous with the primary portion of Canwood Street located south and west of Palo Comado Canyon Road, and presently serves only as a secondary access for an adjacent gas station at the northeast corner of Canwood Street and Palo Comado Canyon Road. This new project access driveway will serve an internal roadway that circles the school and provides on-site vehicular circulation within the school grounds. A secondary, "emergency only" access to Chesebro Road, located near the northern project boundary (north of the intersection with Driver Avenue/Palo Comado Canyon Road) is also provided, as required by the Los Angeles Department of Regional Planning, in response to Los Angeles County Fire Department, City of Agoura Hills, and general community concerns regarding fire safety for the project and surrounding area.

The permanent buildings for the School are to be developed in a series of phases over the course of approximately 12 years, with student enrollment growing accordingly based upon the capacity of the completed campus during each phase. Phase I will place a series of both permanent and modular structures on the site to accommodate a maximum of 390 students, and is anticipated to be completed within about one year of receipt of final project approvals.


N
TRUCK PICK-UP
PARKING FOR 8 CARS
BUS LOAD
PROPOSED PARKING
AC PAVING
PROPOSED PARKING
BUS LOAD
PROPOSED PARKING
PROPOSED PARKING
PROPOSED PARKING

Phase II will construct additional permanent facilities to replace many of the modular structures, plus add permanent athletic fields to the site. This second phase of the project would begin within approximately two years of completion of Phase I, and allow for a total enrollment of up to 670 students. Phase III will continue the development of the permanent structures on the project site, and will allow for the full enrollment of 750 students by the year 2010. Finally, Phases IV through VI would complete the development of the school facilities through the 12-year program. These later phases will continue to replace temporary modular facilities with the final permanent buildings, but will not result in any increases in enrollment beyond the maximum 750 students allowed by 2010 as part of Phase III.

As thoroughly detailed in the approved February 2005 project traffic study, the "full enrollment" project described above would result in a total of three (3) significant impacts during one or more of the peak analysis periods, at the intersections of Driver Avenue/Palo Camodo Canyon Road at Canwood Street/Chesebro Road, Canwood Street/Palo Comado Canyon Road at the US-101 Northbound Ramps, and at Dorothy Drive and US-101 Southbound Freeway Ramps. Measures to mitigate the project-specific impacts of the approved "full enrollment" project are described in the approved traffic study and DEIR/FEIR, and include both signalized (installation of new traffic signals) and unsignalized alternatives, some of which also recommended roadway or localized intersection widenings and/or restriping, in response to City of Agoura Hills comments noting the rural nature of the vicinity and the incompatibility of traffic signals within this area. The mitigation proposals to address project impacts at the project's primary access location of Canwood Street/Palo Comado Canyon Road at the US-101 Northbound Ramps also included a "roundabout" alternative suggested by Caltrans. However, all of the proposed measures and alternatives were deemed acceptable by Caltrans, and each would reduce the impacts of the approved project to less than significant levels.

However, Caltrans has recently indicated, in agreement with previous notifications from County Department of Public Works, that preparation of a Project Report/Project Study Report (PR/PSR) will be required to adequately evaluate and compare the two potential improvements at the site access intersection (the roundabout and the alternative traffic signal) at the intersection of Canwood Street/Palo Comado Canyon Road and the US-101 Northbound On/Off-Ramps. This PR/PSR process will be more involved than the originally identified Project Engineering Evaluation Report (PEER), which would have examined only the preferred roundabout improvement. The PR/PSR process is a significantly longer and more analysis-intensive process than the PEER process, and as a result of this decision, the timing of the installation of any of the identified permanent intersection mitigation improvements will likely be

pushed well beyond the School's desired occupancy date. As the approved project's conditions of approval require installation of the identified "full buildout" mitigation measures, particularly at the critical location of Canwood Street/Palo Comado Canyon Road and the US-101 Northbound On and Off-Ramps prior to occupancy of the School, the delays in approval and construction of the mitigation measures would likely prevent use of the new School site until well after the construction of the campus itself is completed.

Therefore, in recognition of these conditions and situations, the Los Angeles County Board of Supervisors, at their regularly scheduled meeting on January 23, 2007, directed that the Heschel School identify and implement an interim School occupancy program, potentially including an aggressive busing/carpooling program and alternative site access routes, to support a reduced-enrollment 390-student campus until such time as the final traffic and access improvements can be identified and implemented.

Proposed Interim (390-Student) School Project

In order to maintain the construction efficiencies programmed into the originally-approved "full enrollment" School project, the actual development of the site, including all structures, parking facilities, play areas and athletic fields, and access and internal site circulation elements would continue as proposed, although occupancy of the School site would be limited to 390 students in grades pre-K through 5th Grade until such time as the final mitigation improvements described in the project's conditions of approval can be completed. The interim School will include a total of approximately 71 faculty, staff, and administrative personnel. The anticipated interim School enrollment (by grade) and staffing levels are summarized in the appendix.

However, as noted earlier, the primary objective of the Heschel School interim occupancy program is to provide options which will allow occupancy of the School during the design, approval, and installation process necessary for implementation of the required final project traffic mitigation measures identified in the project EIR, or mitigation measures as subsequently determined during the mitigation approval process. In order to achieve this objective, any interim occupancy program would, of necessity, need to avoid significant traffic impacts that would require installation of any such mitigation improvements. An examination of the approved project traffic study indicated that, of the three project-specific traffic impacts produced by the "full enrollment" (750-student) School, two of those impacts (at Driver Avenue/Palo Camodo Canyon Road at Canwood Street/Chesebro Road, and at Dorothy Drive at the US-101 Southbound Freeway Ramps) could be avoided simply by reducing the net trip generation of the School during the peak periods.

Conversely, the impact at the third location (the project's proposed main entrance location at the intersection of Canwood Street/Palo Comado Canyon Road at US-101 Northbound Ramps) presented a different problem. The intersection exhibits an unusual offset configuration, with both Canwood Street and the US-101 Northbound Off-Ramp intersecting Palo Comado Canyon Road on the east side of the roadway; the US-101 Northbound Off-Ramp is located opposite the Off-Ramp on the west side of Palo Comado Canyon Road. Due to this unique intersection configuration, with the US-101 Northbound Off-Ramp and Canwood Street intersecting Palo Comado Canyon Road within approximately 50 feet of each other, operations of this intersection in the future, assuming School traffic entering and exiting on Canwood Street, will require a significant amount of traffic control. As identified in the approved project traffic study, two mitigation alternatives are being considered for this intersection, a traffic signal, and a "roundabout" design. Both potential mitigation measures fully address the need for intersection approach controls, and will fully mitigate the impacts of the "full enrollment" School project.

A detailed review of the operations of this intersection, however, revealed that the critical component requiring access control was the "outbound' traffic from Canwood Street; the "twin approach" configuration of Canwood Street and the US-101 Northbound Off-Ramp on the east side of Palo Comado Canyon Road necessitates separating the westbound traffic flows on each of these approaches in order to avoid conflicting movements occurring at the same time. As such, even nominal amounts of Heschel School traffic exiting from Canwood Street to Palo Comado Canyon Road would require come type of traffic control, resulting in a "mitigation" improvement for any site access scenario involving "outbound" school traffic at this location. Therefore, it was determined that elimination of westbound Canwood Street project traffic would allow for a simpler operation of this intersection, and provide the opportunity to develop an interim School access scheme that would not require mitigation.

One-Way Loop Interim School Access Proposal

The approach described above resulted in the development of a "one-way loop" access scheme for the interim School, which would eliminate "outbound" (westbound) project traffic from the intersection. As shown in Figure 4, all "inbound" School traffic would continue to use the Canwood Street access to enter the site, just as assumed in the approved project traffic study. However, instead of exiting via the reverse route, vehicles would travel through the School site and exit along the required "emergency access" roadway to Chesebro Road, north of Driver Avenue/Palo Comado Canyon Road. From this egress point, outbound vehicles would travel

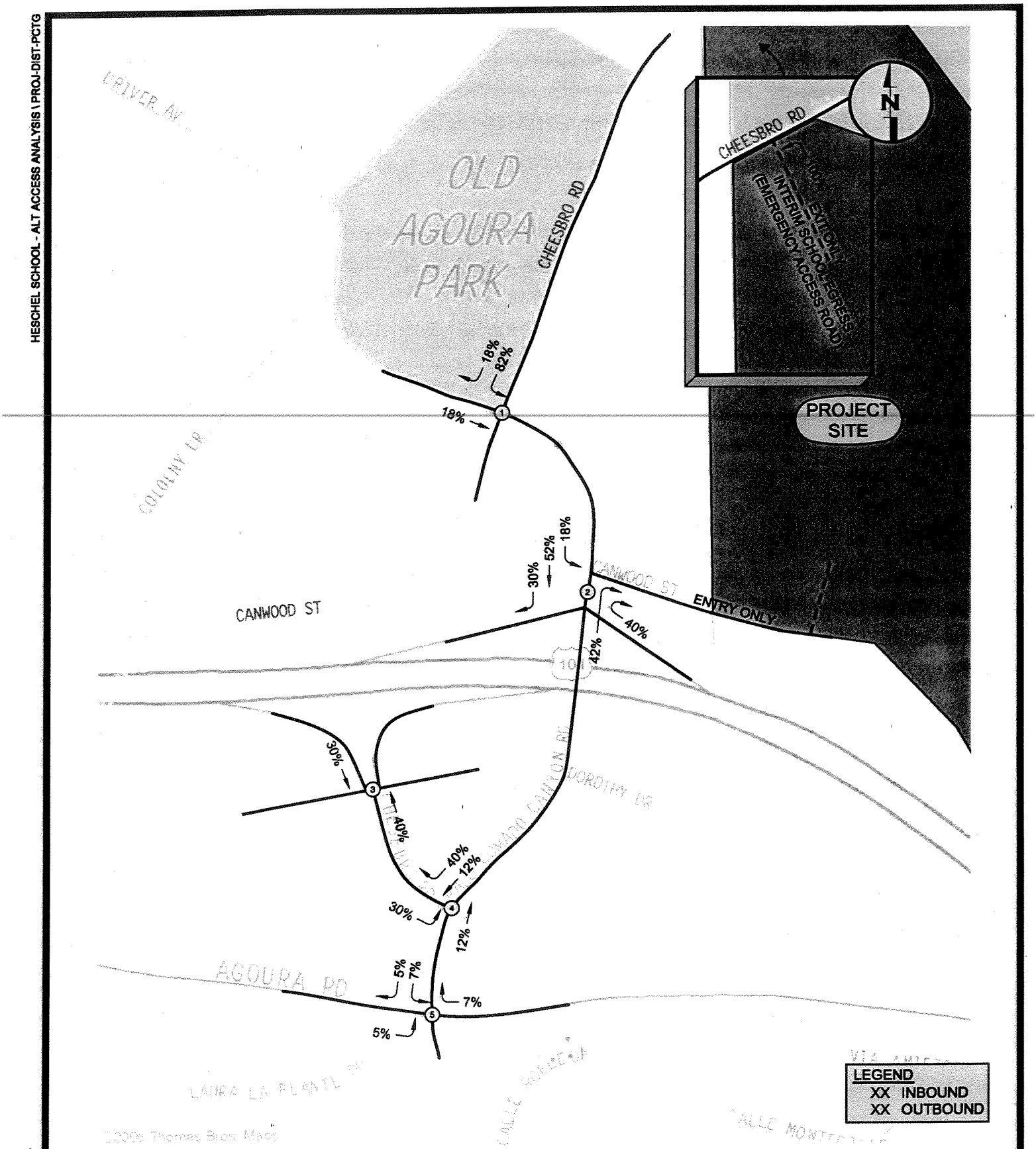


FIGURE 4

2/12/2007

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HESCHEL SCHOOL
INTERIM OPERATIONS
ACCESS DISTRIBUTION PERCENTAGES

south along Chesebro Road to the intersection of Driver Avenue/Palo Camodo Canyon Road at Canwood Street/Chesebro Road, returning to their points of origin along the travel patterns identified in the original approved Crain & Associates traffic study. Although this access scheme results in a slight modification of the School traffic distributions at two of the study intersections (Driver Avenue/Palo Camodo Canyon Road at Canwood Street/Chesebro Road, and Dorothy Drive at the US-101 Southbound Freeway Ramps) as compared to the original study, the overall travel patterns for School traffic adhere to those identified in the approved traffic impact analyses, and do not present a significant departure from those assumptions.

Interim School Project Trip Generation Estimates

The next step in the process was to identify the specific operations of the proposed interim School operations, and to subsequently determine the net project trip generation levels for each of the three peak time periods (AM Peak Hour, PM School Peak Hour, and PM Peak Hour) analyzed in the original traffic study. A thorough assessment of the potential School operations was conducted by the Heschel School administration to provide information for this supplemental analysis, including the arrival/departure times of the School's faculty and staff, and each of the grade levels (pre-K through 5th Grade) anticipated at the interim School. Additionally, the trip generation estimates included an assessment regarding the likelihood that some of the younger students would be capable of utilizing or permitted to (by parents) utilize any type of bus program (e.g., students younger than 6 years old), or whether such students would need to be dropped-off/picked-up by a parent or guardian.

The resulting interim School operations plan identified three distinct elements to the School's arrival/departure timelines, Kindergarten and pre-K classes, 1st through 5th Grades, and the School's faculty/staff. A total of approximately 138 students are anticipated to be in the Kindergarten and pre-K classes at the maximum 390-student school enrollment cap. These students are generally five years or younger, and therefore, they operate on a limited classroom day, from approximately 9:15 AM to about 2:00 PM. Due to their ages, these students are not anticipate to significantly participate in a typical "busing" program, although carpooling of these students will be mandatory, as described later in this report.

The remaining 252 1st through 5th Grade students will operate on a more traditional school schedule, with class start times generally around 8:00 AM, and dismissal times between 3:00 and 3:30 PM. These older students were assumed to be the primary candidates for the proposed busing program described later, although again, in order to provide flexibility, some carpooling of these students was also assumed.

Finally, the School's 71 faculty and staff generally arrive between about 7:30 and 8:00 AM. Typical of many administrative, custodial, and teaching staff, however, many of these personnel do not leave the School site at the class dismissal times, and stay to complete business or teach/participate in extracurricular after school activities. Based on information provided by the School, it is estimated that most of the staff departs the site between 15 minutes and one hour following class dismissal. In order to provide maximum flexibility for the School, and to examine the potential "worst case" traffic impacts, none of the faculty/staff were assumed to participate in the proposed busing program, although again, some carpooling and/or ride share activities for the faculty/staff is anticipated.

A final factor included in the estimation of the potential trip generation for the interim School is the ultimate goal that the interim School operates at its maximum enrollment level of 390 students without creating a significant traffic impact on any of the study intersections or within the surrounding community, and as such, the determination of the number of vehicles "allowed" at each of the intersections without triggering a significant impact was factored into the development of the preliminary carpooling and busing participation estimates. This process was based on the revised "one-way loop" access travel patterns described earlier, and utilized the "Future (2010) Without Project" traffic volumes and analyses contained in the approved project traffic study as a baseline.

However, as noted in the discussion of the proposed School operations, some of the anticipated trip-making activity is expected to occur "outside" the originally analyzed time periods. While these "off peak" times are expected to exhibit much lower traffic volumes and better intersection operations than during the three "peak" periods, no specific data was available in the original study to support that assumption. Thus, in order to provide a detailed evaluation of all potential interim School traffic impacts, additional traffic data was collected at each of the five study intersections to supplement the data contained in the original project traffic study during the "Post-AM peak hour (8:45 to 9:45 AM)", the "Pre-PM School peak hour (1:30 to 2:30 PM)", and the "Pre-PM peak hour (3:00 to 4:00 PM)" periods. These supplemental time period counts were then adjusted to reflect the anticipated "Future (2010) Without Project" conditions described above for the original time periods, including utilization of the 2.0 percent annual traffic growth factor, for consistency with the methodology and assumptions of the original traffic study. A detailed discussion of the traffic volumes, calculations, and results of the analysis of these three additional time periods is contained in a later section of this report.

The implementation of the proposed student busing program required that the trip generation estimation methodology for the interim School operations be modified from that identified in the approved project traffic impact analyses. As described in detail in that report, the Crain & Associates trip generation methodology was based on trip generation rates derived from actual counts of traffic activity at the existing School, supplemented by data obtained from other private school studies. However, these counts, and the School-specific trip generation rates derived from them, do not account for high levels of student busing, and therefore would not accurately reflect the traffic characteristics of the School under an interim student busing program. As such, a new calculation of the potential School-related trips was prepared to incorporate the effects of a student busing program.

Therefore, using the original traffic study and the supplemental "off peak" period intersection traffic data, an iterative trial-and-error process was undertaken to identify the maximum amount of "net new" project trips which would be "allowable" at each of the five study intersections before a significant impact would occur. This net project trip value was determined for each of the three original analysis "peak" time periods (AM peak hour, PM School peak hour, and PM peak hour), and for the three supplemental "off peak" time periods (Post-AM peak hour, Pre-PM School peak hour, and Pre-PM peak hour) identified for this study. These calculations included trip "credits" for the relocation of the existing student population at the current Heschel School site near Liberty Canyon Road during the three "peak" time periods (as in the original study), since trips generated by these students would "reorient" to the new School site, and their existing trips would either become incorporated into the trip generation assumed for the new School, or eliminated from some of the study intersections altogether. The "existing" Heschel School student trips using the study intersections are shown in the appendix. No "existing" student trip credits were assumed for the "off peak" time periods, since no data was collected regarding the existing site trip generation during these times. Although it is expected that some "off peak" trip activity currently exists, this assumption guarantees a "worst case" assessment of potential impacts during the "off peak" hours.

The trip calculation process also involved a number of operational assumptions, depending on the type of activity being examined. First, for the faculty/staff calculations, as noted earlier, none of the 71 faculty and staff were assumed to be included in the busing program. This assumption was based on the need for teachers, school administrators, and other staff to work schedules that may not adhere to specific bus schedules dictated by student arrival and departure activities. Trip generation for these faculty/staff was assumed to reflect the following

characteristics; all 71 of the School's faculty/staff were assumed to drive to the site, with most assumed to drive alone. However, based on general travel characteristics in the Southern California region, an average vehicle occupancy (AVO) of approximately 1.2 persons per vehicle was also assumed for the faculty/staff transportation profiles, indicating some nominal level of potential site-related carpooling or ridesharing activity. This assumption resulted in an estimated total of approximately 59 faculty/staff-related vehicles.

It was further assumed that approximately 20 percent of the faculty/staff would be dropped off at and picked up from the site by a spouse or other person as part of an off-site "ride share" trip (for instance, a teacher would be dropped off at the School in the morning by a spouse or other driver on their way to work or as an interim stop along an existing trip). This assumption results in an "outbound" faculty/staff trip component during the AM peak hour, and an "inbound" trip component during the afternoon periods, further producing a "worst case" trip estimate for faculty/staff at the School.

Finally, it was assumed that all "arriving" faculty/staff trips would occur during the AM peak hour, but departures would be spread throughout the afternoon. Approximately 20 percent of the faculty/staff were assumed to leave the School during the PM School peak hour period, with an additional 50 percent leaving during the Pre-PM peak hour (about 15 to 45 minutes after class dismissal), with the remaining 20 percent leaving during the typical PM peak hour period. Again, this assumption is considered conservative, in that most faculty/staff are anticipated to remain at the School for up to an hour after School dismissal times as part of their typical work day. However, this assumption puts a substantial number of faculty/staff trips into the critical PM School peak hour period, assuring that all potential traffic impacts of the interim School operations are identified.

Trip generation estimates for the student population were derived using similar assumptions. First, as described previously, the approximately 138 Kindergarten and younger students were not anticipated to significantly use the bus program, and would instead be driven to and from the School by parents. These trips, however, would not occur during the typical AM or PM School peak hour times, as the class times for these students are from approximately 9:15 AM to about 2:00 PM, although potential impacts at some of the study intersections could still occur if the number of trips is not limited. Therefore, it was assumed that, while not participating directly in the busing of students, any of the Pre-K through Kindergarten students driven to the site would be part of a mandatory carpooling program, with a minimum of 2.65 students per vehicle.

Trip generation estimates for the remainder of the student population, which are assumed to participate in a required student busing program, were derived using similar assumptions. However, for purposes of other environmental impact assessments that will be required as part of the approval of the proposed busing program, the number of bus trips was maximized rather than minimized. This assumption also provides intrinsic flexibility in the ultimate determination of the actual busing program bus fleet, since the maximum bus traffic "envelope" will be identified; any program requiring fewer buses will inherently produce lower traffic impacts, and will not require future analysis to receive approval.

The determination of the student busing trip generation was based on the assumption that the School would "hire out" the buses from an independent busing contractor, and that all buses would enter and leave the site during their respective trips to deliver and pick up students; no buses were assumed to be stored at the School during the day. This assumption therefore maximized the number of bus trips during each analysis period as a continuation of the "worst case" traffic impact assessment. Additionally, it was assumed that the busing program would utilize a combination of 20-passenger and 40-passenger buses; 20-passenger buses were assumed to exhibit a "passenger car equivalency" (e.g., the relative effects on traffic operations compared to typical automobile traffic) of 1.0, while the 40-passenger buses were assumed to exhibit a "pce" value of 1.5. Finally, similar to the assumptions for the faculty/staff trips, it was assumed 100 percent of the "arrival" busing activity would occur during the AM peak hour, and that approximately 90 percent of the "outbound" busing activity would take place during the normal PM School peak hour. The remaining 10 percent of the "outbound" student bus traffic would occur during the PM peak hour (no buses were assumed during the Pre-PM peak hour period). This assumption was based on the likelihood that some students would stay after school as part of some extracurricular activity (sports, clubs, etc.) and would be provided a guaranteed ride home via buses arranged especially for this purpose; however, in no case were these late-staying students assumed to be picked up by parents or others in individual vehicles.

Based on these assumptions and methodologies, the interim Heschel School trip generation estimates were calculated, and are shown in Table 1. Although this report does not contain the individual "iterative" results of the trip-estimation process, the trip generation values shown in Table 1 will not produce significant impacts at any of the study intersections during any of the time periods examined. Moreover, the values shown in Table 1 provide the detail necessary to describe the proposed carpool/busing program, in that they identify the maximum number and type of vehicles that can enter or leave the School site during each of the critical periods.

Table 1
Heschel School Interim Occupancy/Student Busing Program Trip Generation Estimates

School Population Component	Daily	AM Peak Hour (7:00 to 8:15 AM)			Post-AM Peak Hour (8:45 to 9:45 AM)			Pre-PM School Peak Hour (1:30 to 2:30 PM)		
		In	Out	Total	In	Out	Total	In	Out	Total
71 Faculty/Staff (drive alone - 1.2 AVO; assumes 20% "drop off")	142	59	12	71	0	0	0	0	0	0
138 pre-school students - driven (52 vehicles) (assumes 2.65 students/vehicle)	208	0	0	0	52	52	104	52	52	104
40 students - carpool (16 vehicles) (assumes 2.5 students/vehicle)	64	16	16	32	0	0	0	0	0	0
30 students - bused (2) buses (assumes 20 students/bus @ 75% occupancy; 1.0 PCE)	8	2	2	4	0	0	0	0	0	0
182 students - bused (6) buses (assumes 40 students/bus @ 75% occupancy; 1.5 PCE)	36	9	9	18	0	0	0	0	0	0
Total Number of Vehicles	458	86	39	125	52	52	104	52	52	104

Table 1 (continued)
Heschel School Interim Occupancy/Student Busing Program Trip Generation Estimates

School Population Component	PM School Peak Hour (2:30 to 3:45 PM)			Between PM School and PM Peak Hour (3:45 to 4:30 PM)			PM Peak Hour (4:30 to 5:45 PM)		
	In	Out	Total	In	Out	Total	In	Out	Total
71 Faculty/Staff (drive alone - 1.2 AVO; assumes 20% "drop off")	4	18	22	6	29	35	2	12	14
	(assumes 30% leaving)			(assumes 50% leaving)			(assumes 20% leaving)		
138 pre-school students - driven (52 vehicles) (assumes 2.65 students/vehicle)	0	0	0	0	0	0	0	0	0
	(assumes students leave between 1:30 and 2:00 PM)								
40 students - carpool (16 vehicles) (assumes 2.5 students/vehicle)	13	13	26	2	2	4	1	1	2
	(assumes 80% leaving)			(assumes 10% leaving)			(assumes 10% leaving)		
30 students - bused (2) buses (assumes 20 students/bus @ 75% occupancy; 1.0 PCE)	1	1	2	0	0	0	1	1	2
	(assumes 90% of buses)			(assumes no buses)			(assumes 10% of buses)		
182 students - bused (6) buses (assumes 40 students/bus @ 75% occupancy; 1.5 PCE)	8	8	16	0	0	0	1	1	2
	(assumes 90% of buses)			(assumes no buses this period)			(assumes 10% of buses)		
Total Number of Vehicles	26	40	66	8	31	39	5	15	20

As shown in Table 1, the proposed "worst case" busing program would result in a total of approximately 125 pce trips (86 inbound, 39 outbound) during the AM peak hour, 104 pce trips (52 inbound, 52 outbound) during the Post-AM peak hour, 104 pce trips (52 inbound, 52 outbound) during the Pre-PM School peak hour, 66 pce trips (26 inbound, 40 outbound) during the PM School peak hour, 39 pce trips (8 inbound, 31 outbound) during the Pre-PM peak hour, and 20 pce trips (5 inbound, 15 outbound) during the PM peak hour. The interim operations of the School are anticipated to result in a total of approximately 458 daily trips, which were calculated by adding the total inbound and outbound trips during the six peak periods; no significant trip activity is likely to occur outside these times under normal School operations.

It is important to note that, although specific assignments are identified in Table 1 for the various population components of the interim school (faculty/staff, carpooled students, bused students in both 20 and 40-passenger buses), there are a number of different carpool/busing-occupancy scenarios that can be identified. Therefore, the program assumptions and breakdowns shown in Table 1 should not be considered as a finalized definition of any busing program. In actuality, the busing/carpool program will be somewhat dynamic, in that it will likely vary slightly each semester based on a number of factors including the actual residence locations of the Heschel students; the success of any such busing/carpool program depends on flexibility in its ability to address ever-changing conditions. As such, the values in Table 1 should be interpreted only to identify, for analysis purposes, the maximum allowable passenger car equivalent (pce) trip generation for each of the study intersections during each of the time periods, and to allow the determination of the "feasibility" of such a program with regard to the number of buses and carpools that may be necessary. This information was then used to construct the trip "caps" and vehicular "hierarchies" described in the attached Heschel School Interim Carpool/Student Busing Program that, if approved, will define the amount of traffic that is permitted at the School.

Finally, using the trip generation estimates shown in Table 1, combined with the revised "one-way loop" site access distributions identified previously in Figure 4, the project trips at each of the five study intersections were determined for each of the six peak analysis periods. The total project pce trip assignment results are shown in Figure 5(a) for the AM peak hour, Figure 5(b) for the Post-AM peak hour, Figure 5(c) for the Pre-PM School peak hour, Figure 5(d) for the PM School peak hour, Figure 5(e) for the Pre-PM peak hour, and Figure 5(f) for the PM peak hour periods. The "component" trip assignments, identifying the trips at the study intersections for faculty/staff vehicles, student carpools, and for both the 20-passenger and 40-passenger buses, are contained in the appendix of this report.

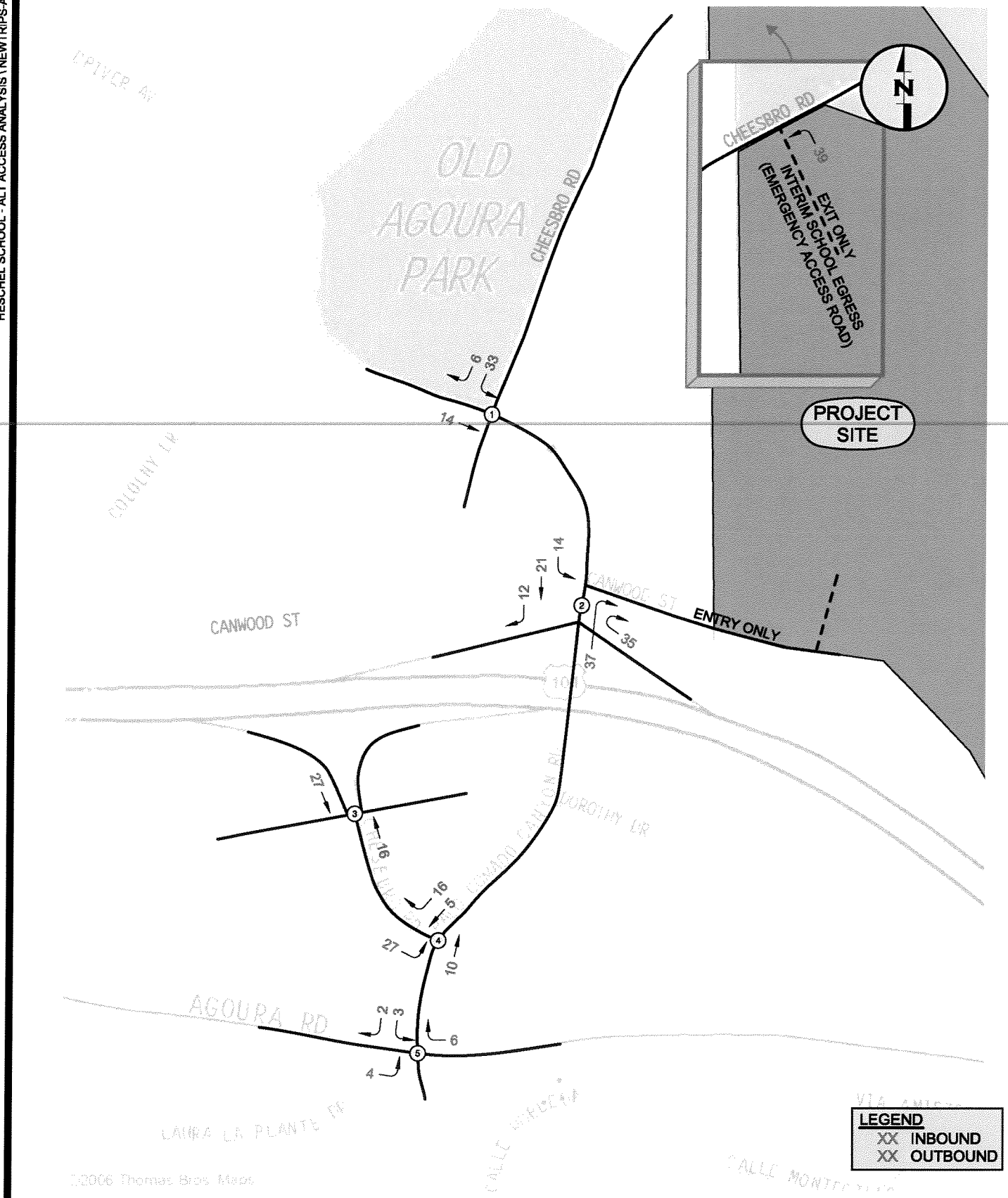

FIGURE 5(a)

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HESCHEL SCHOOL INTERIM OPERATIONS
TOTAL NEW SCHOOL TRIPS - IN PCE
AM PEAK HOUR

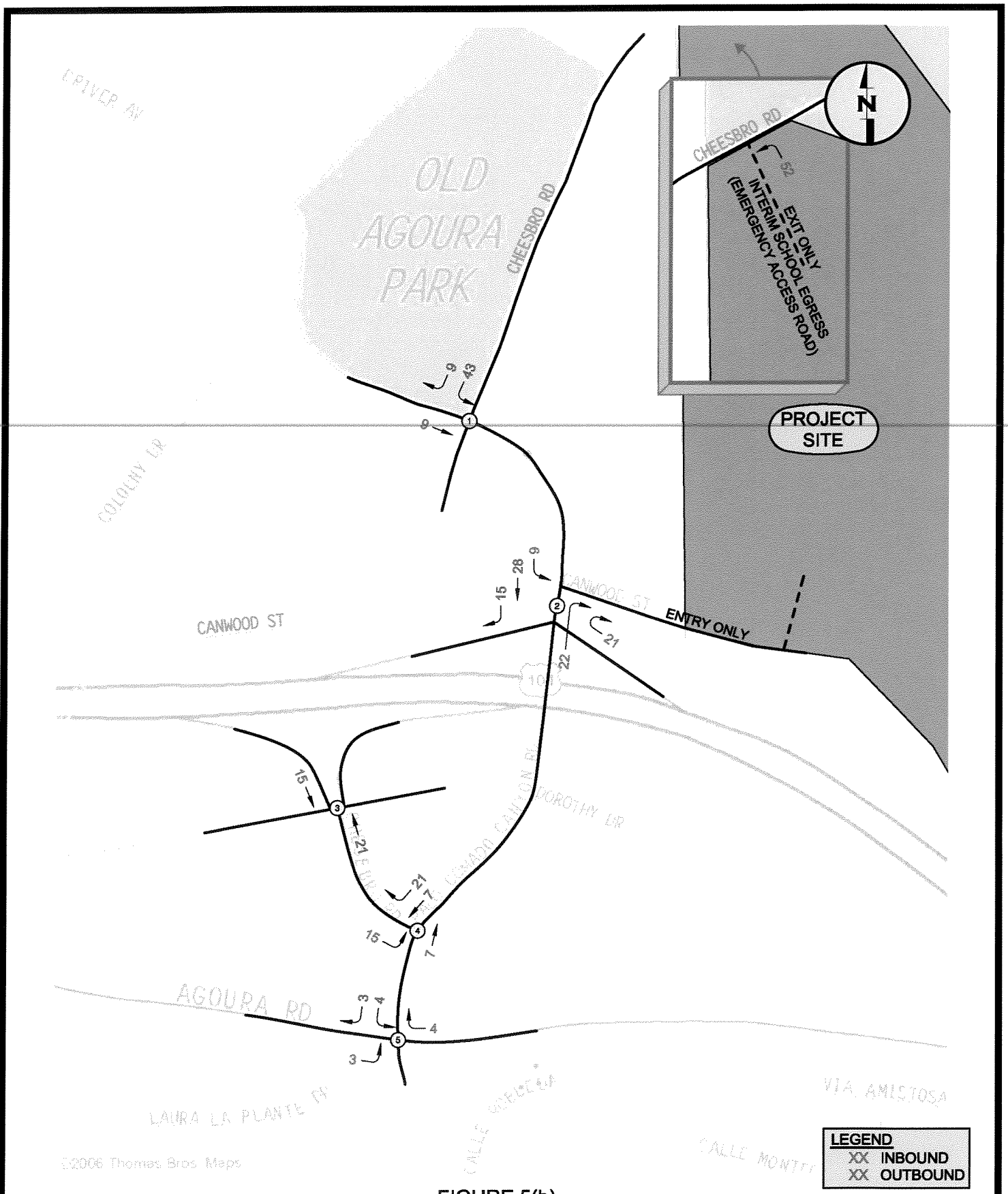


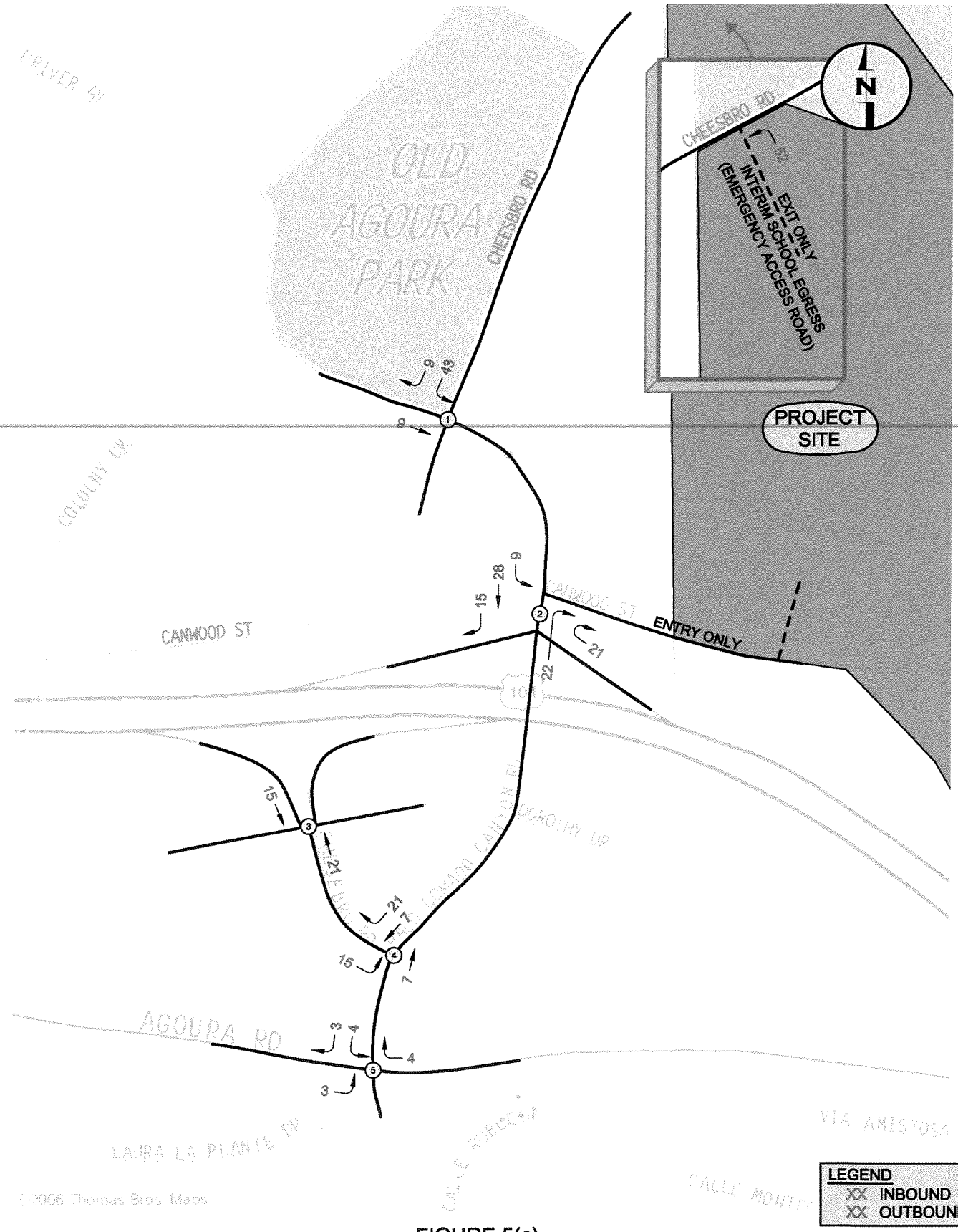
FIGURE 5(b)

2/27/2007

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

INTERIM HESCHEL SCHOOL OPERATIONS
TOTAL NEW SCHOOL TRIPS (PCE)
POST-AM PEAK HOUR

HESCHEL SCHOOL - ALT ACCESS ANALYSIS \ NEW-TRIPS-PRE-PM(SCHOOL)



2/27/2007

FIGURE 5(c)

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

INTERIM HESCHEL SCHOOL OPERATIONS
TOTAL NEW SCHOOL TRIPS (PCE)
PRE-PM SCHOOL PEAK HOUR

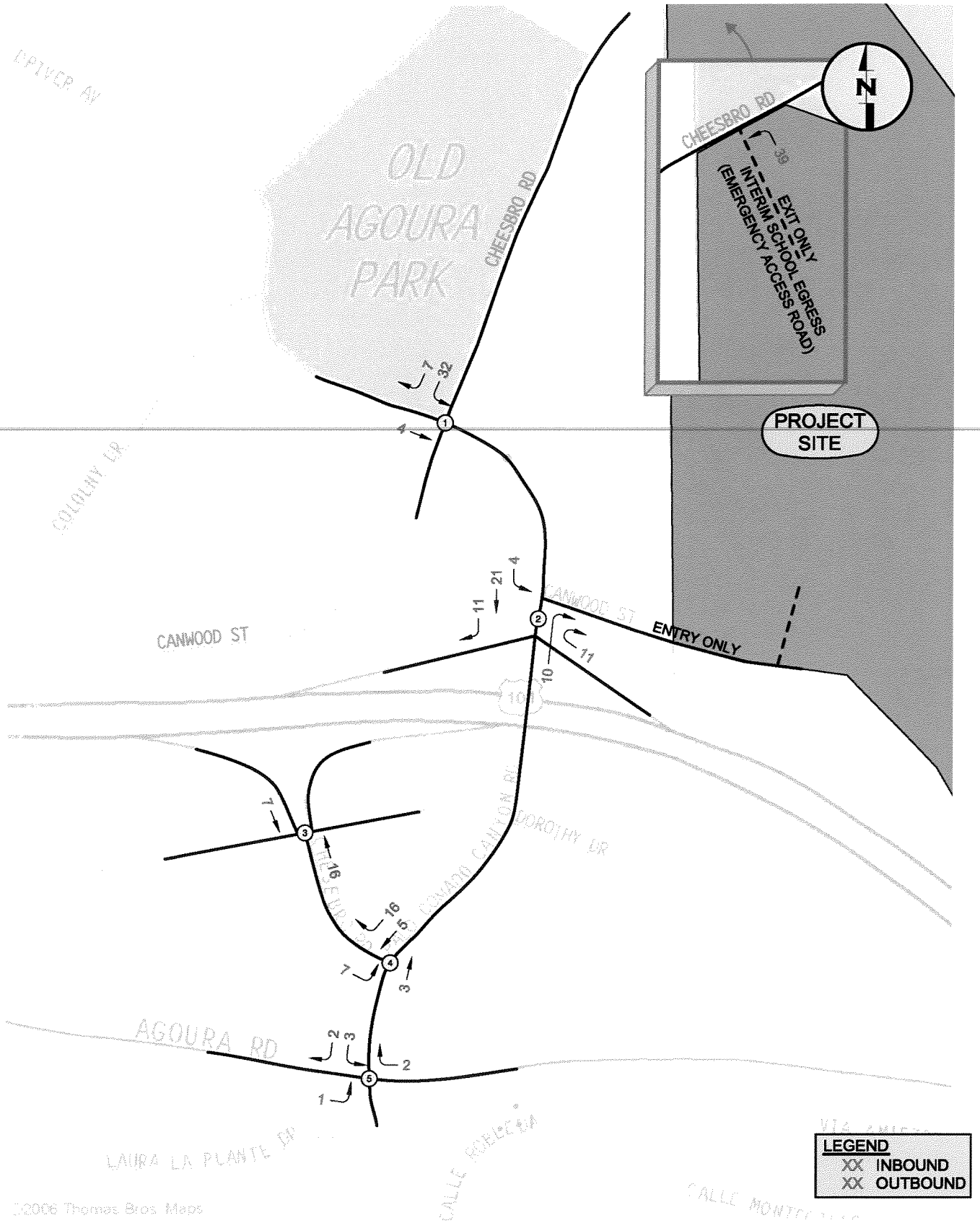


FIGURE 5(d)

2/12/2007

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

HESCHEL SCHOOL INTERIM OPERATIONS
TOTAL NEW SCHOOL TRIPS - IN PCE
SCHOOL PM PEAK HOUR

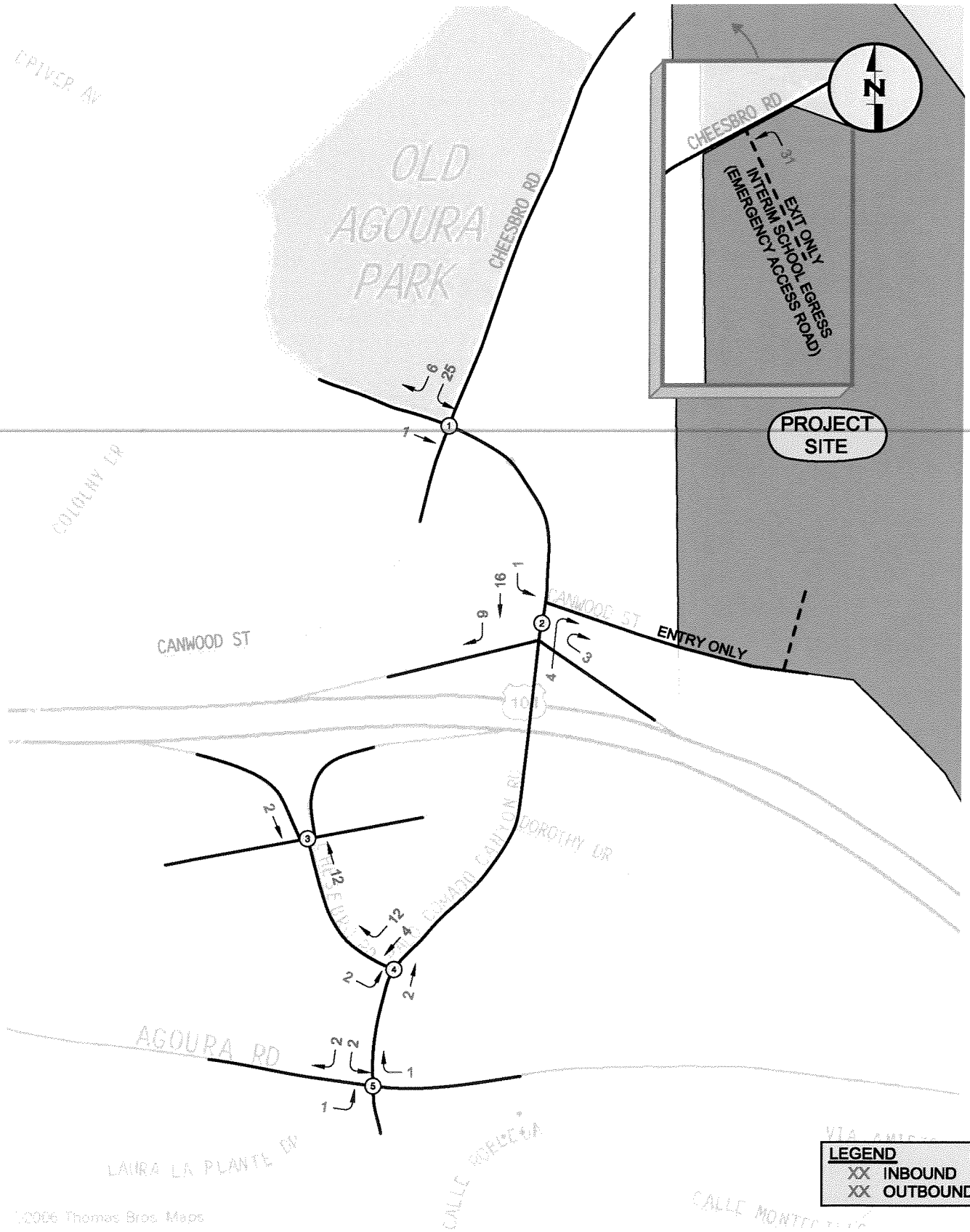


FIGURE 5(e)

HESCHEL SCHOOL INTERIM OPERATIONS
TOTAL NEW SCHOOL TRIPS - IN PCE
PRE-PM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

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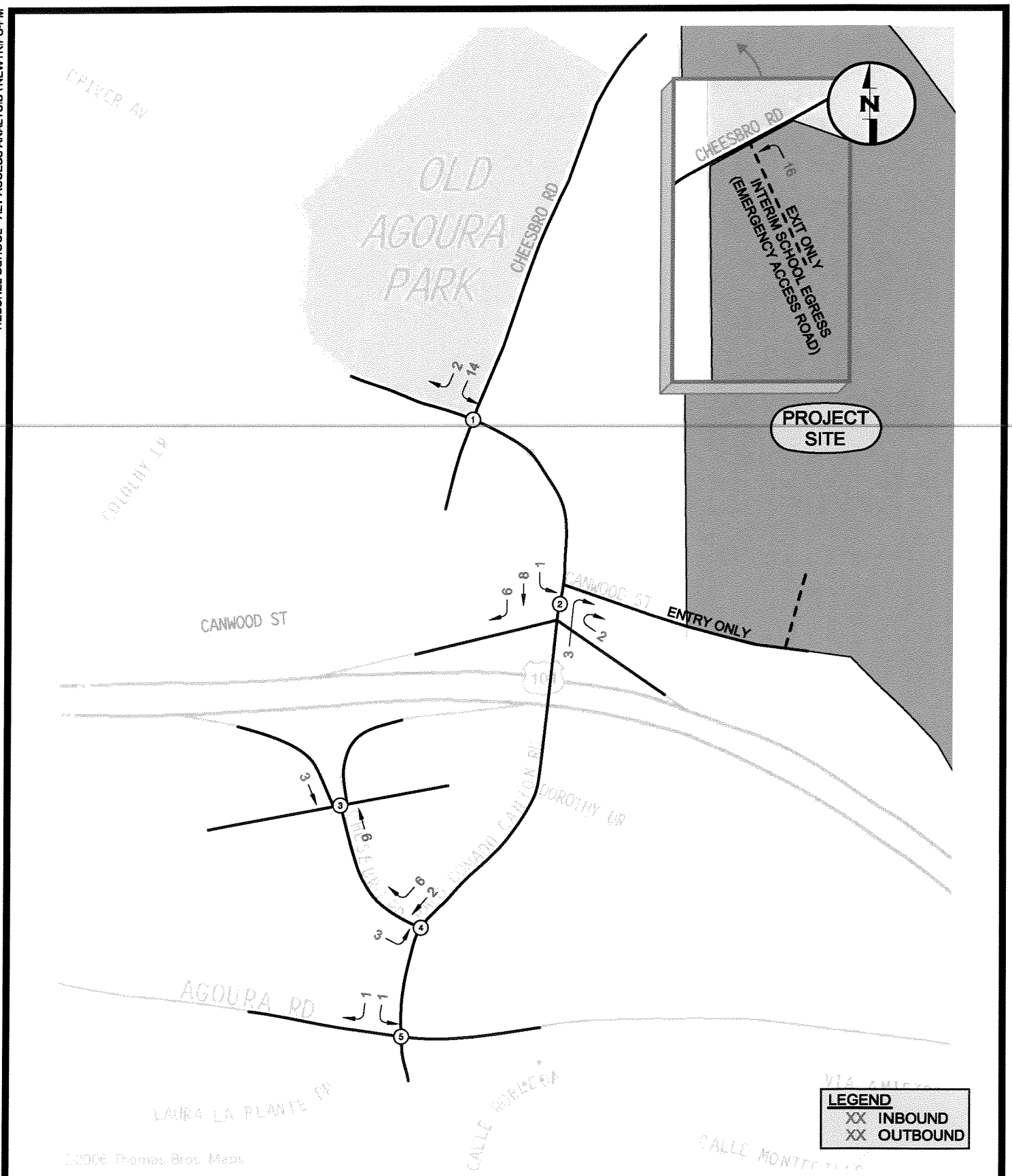

FIGURE 5(f)

HESCHEL SCHOOL INTERIM OPERATIONS
TOTAL NEW SCHOOL TRIPS - IN PCE
PM PEAK HOUR

HIRSCH GREEN
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2/12/2007

APPENDIX B

Traffic Impact Analysis, Proposed Interim School, Mid Block

TRAFFIC IMPACT ANALYSIS STUDY AREA

Environmental Setting

The project site is located in the County of Los Angeles, adjacent to the eastern boundary of the City of Agoura Hills, and immediately north of the Ventura Freeway (US-101). The site is bounded on the south by the US-101 Freeway, Canwood Street, and Palo Comado Canyon Road, and on the west by existing residential development and a portion of Chesebro Road. The northern and eastern borders of the site are a series of ridgelines, which form the canyon in which the site is situated. The project study area is primarily rural and residential in nature, with single-family homes to the west of the project site in the Community of Old Agoura, although development farther to the west and south becomes more urban and commercial. The proposed project itself is located on one of the last remaining developable parcels in the vicinity, as most of the adjacent land to the immediate south and west of the project has already been developed. The area to the north and east of the site are under the jurisdiction and ownership of the Santa Monica Mountains Conservancy, and will remain undeveloped.

Area Transportation Facilities

The area is served by both local and regional transportation facilities. While the project is located within the County of Los Angeles, the streets and highways within the study area are generally under the jurisdiction of the City of Agoura Hills, and the California Department of Transportation (Caltrans), and all of the study intersections lie at least partially within the City of Agoura Hills. The key roadway facilities in the study area are described below.

Freeways

Ventura Freeway (US-101) – This east-west freeway is located immediately south of the project site, and is the primary transportation facility in the area, serving as an access route between Ventura County and Downtown Los Angeles. The Ventura Freeway provides four lanes in each direction through the study area, although some auxiliary lanes are evident between on and off-ramp locations. Surface street access in the immediate project vicinity is provided via ramps at Palo Comado Canyon Road for westbound traffic, and at Dorothy Drive/Chesebro Road for eastbound freeway traffic. Additional freeway ramps are located approximately one mile to the west at Kanan Road, and approximately one mile to the east at Liberty Canyon Road. The Kanan Road interchange is currently under construction to improve operations at that location.

Streets and Highways

Driver Avenue – This east-west oriented roadway is located to the west of the project site, and provides local access through the City of Agoura Hills between Canwood Street/Chesebro Road on the east to Argos Street, east of Kanan Road. East of Canwood Street/Chesebro Road, Driver Avenue changes names to Palo Comado Canyon Road, which continues southward across the US-101 Freeway and on to its terminus at Agoura Road. Driver Avenue exhibits a variable width roadway with various levels of shoulder improvements, but provides one travel lane in each direction along with limited on-street parking throughout its length. STOP signs are used to control traffic along this roadway in the project vicinity.

Palo Comado Canyon Road – This facility is the southward continuation of Driver Avenue between Chesebro Road/Canwood Street and Agoura Road, and forms the southwest border of the project site. Like Driver Avenue, Palo Comado Canyon Road also is developed to various widths and provides one travel lane in each direction, except on the westbound approach to Canwood Avenue/Chesebro Road, where an additional left-turn pocket is provided, and at Chesebro Road (south of the US-101 Freeway), where an exclusive southbound right-turn only lane is provided. Parking is not allowed on either side of this street in the vicinity of the project site. Palo Comado Canyon Road is controlled via STOP signs at Chesebro Road/Canwood Street and at Agoura Road.

Chesebro Road – This roadway provides local access in the project vicinity, although it is discontinuous at the US-101 Freeway. South of the freeway, Chesebro Road extends from Dorothy Drive opposite the Ventura Freeway Southbound On/Off-Ramps to its intersection with Palo Comado Canyon Road. This section of Chesebro Road is approximately 40 feet in width, with one through lane in each direction. North of the US-101 Freeway, Chesebro Road extends northerly from Driver Avenue, opposite Canwood Street, and forms a portion of the western boundary of the project site. One through lane in each direction is provided on this 36-foot wide segment of Chesebro Road. In the area north of Driver Avenue, residential and park uses abut Chesebro Road, while the segment south of the US-101 Freeway is fronted primarily by commercial uses. The intersections of Chesebro Road at Dorothy Drive/US-101 Southbound On/Off-Ramps, at Palo Comado Canyon Road, and at Driver Avenue/Palo Comado Canyon Road (opposite Canwood Street) are each STOP sign controlled.

Canwood Street – This generally east-west oriented roadway, located south and west of the project site, provides local access from near the western boundary of the City of Agoura Hills to the project vicinity, typically paralleling the US-101 Freeway on the north side. Canwood Street is discontinuous near Palo Comado Canyon Road, curving northward from its east-west alignment to intersect with Driver Avenue/Palo Comado Canyon Road opposite Chesebro Road. The remainder of Canwood Street extends easterly from Palo Comado Canyon Road, just north of the US-101 Freeway Northbound Off-Ramp, for approximately 200 feet where it terminates. Access to the project is proposed near the easterly terminus of this section of the road. Canwood Street generally provides one travel lane in each direction throughout its length, with on street parking allowed in some areas. Both intersections of Canwood Street at Palo Comado Canyon Road are STOP sign controlled.

Public Transportation

The Los Angeles County Metropolitan Transportation Authority (MTA), and the Los Angeles Department of Transportation (LADOT) Commuter Express are the primary service providers in the project area. Each provides one line through the project area, as described below.

MTA Line 161 -- This bus line provides weekday, weekend, and holiday service between Woodland Hills and Thousand Oaks, via the US-101 Freeway and surface streets paralleling the freeway. In the project vicinity, Line 161 runs along Agoura Road (east of Palo Comado Canyon Road), Chesebro Road, Dorothy Drive, and Roadside Drive south of the Freeway. The nearest stop to the project site is provided at Palo Comado Canyon Road/Chesebro Road south. Weekday headways for Line 161 are approximately every 10 to 30 minutes during the mornings, and approximately every 20 to 30 minutes during the afternoon. Weekend and holiday headways range from 10 to 30 minutes in the morning to hourly in the afternoon.

LADOT Commuter Express Route 423 -- This line provides limited-stop weekday commuter service between Newbury Park and downtown Los Angeles, primarily along the US-101. Stops in the project vicinity are located at Kanan Road and the US-101, and at Liberty Canyon Road and the US-101. Eastbound service is available from approximately 5:00 AM and 6:40 AM, while afternoon westbound service is provided between approximately 3:30 PM and 6:35 PM.

As described above, the existing bus service in the project vicinity has been designed mainly for the use of commuters, and it is not envisioned that students or faculty of the proposed school will utilize public transit as their primary means of commuting to the campus.

ANALYSIS OF AREA TRAFFIC CONDITIONS

Existing Traffic Volumes and Conditions

As described earlier in this document, the purpose of this analysis is to supplement the approved traffic study and DEIR/FEIR analyses of the ultimate "full enrollment" Heschel School project (750-student enrollment) with documentation related to potential impacts resulting from a reduced, 390-student interim project including an aggressive student busing program and alternative site access operation. Therefore, this supplemental analysis focuses on the anticipated future (year 2010) conditions when the School is expected to reach the maximum 390-student enrollment level. However, for purposes of comparison of these forecast conditions to current area traffic conditions, the existing operations of the selected study intersections are provided for ease of reference. The "existing" conditions represent traffic volumes at the time the approved Heschel School traffic study was prepared (Crain & Associates, Revised February 2005). The five study intersections examined in that analysis are listed below.

1. Canwood Street/Chesebro Road at Driver Avenue/Palo Comado Canyon Road
2. Palo Comado Canyon Road at US-101 Freeway Northbound On/Off-Ramps
3. Chesebro Road/US-101 Freeway Southbound On/Off-Ramps at Dorothy Drive
4. Chesebro Road and Palo Comado Canyon Road at Chesebro Road
5. Chesebro Road and Laura La Plante Drive at Agoura Road

The "Existing" traffic volumes for these five study intersections during the typical AM peak hour, the afternoon PM School peak hour, and the PM peak hour periods were excerpted directly from the February 2005 Crain & Associates study without modification, except as noted below. However, as described earlier in this report, some of the anticipated interim School trip activities are expected to occur outside these previously examined time periods. Therefore, this supplemental analysis expanded the original study to include three additional time periods, in order to provide a basis for assessment of all potential School traffic impacts. Additional traffic counts were conducted to address conditions during the "Post-AM peak hour (8:45 to 9:45 AM)", "Pre-PM School peak hour (1:30 to 2:30 PM)", and "Pre-PM peak hour (3:00 to 4:00 PM)" periods. The "existing" traffic volumes at each of the five study intersections are shown for each of the six time periods in Figure 6(a) for the AM peak hour, Figure 6(b) for the Post-AM peak hour, Figure 6(c) for the Pre-PM School peak hour, Figure 6(d) for the PM School peak hour, Figure 6(e) for the Pre-PM peak hour, and Figure 6(f) for the PM peak hour periods.

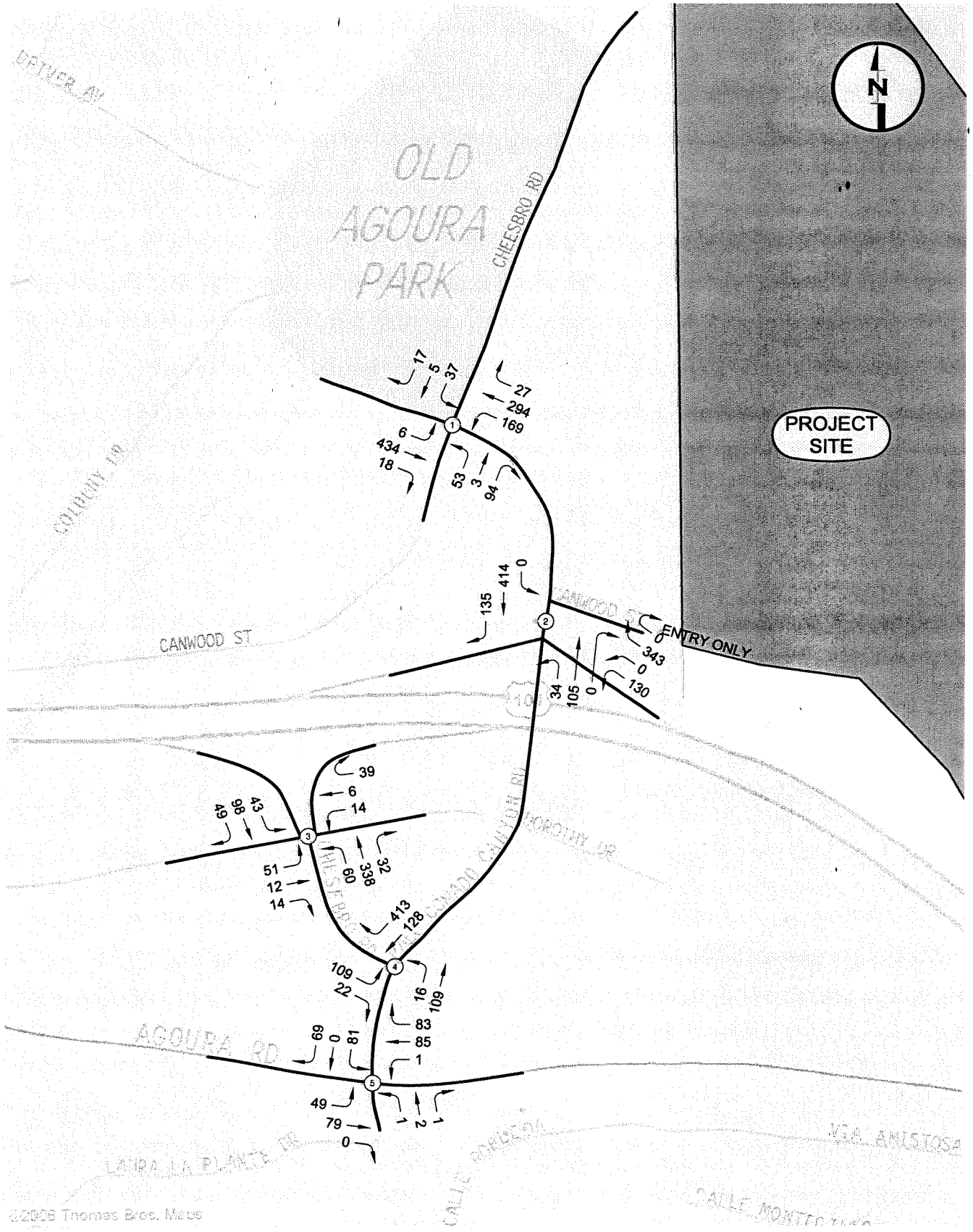

FIGURE 6(a)

2/27/2007

HIRSCH GREEN

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EXISTING (2003) TRAFFIC VOLUMES
AM PEAK HOUR

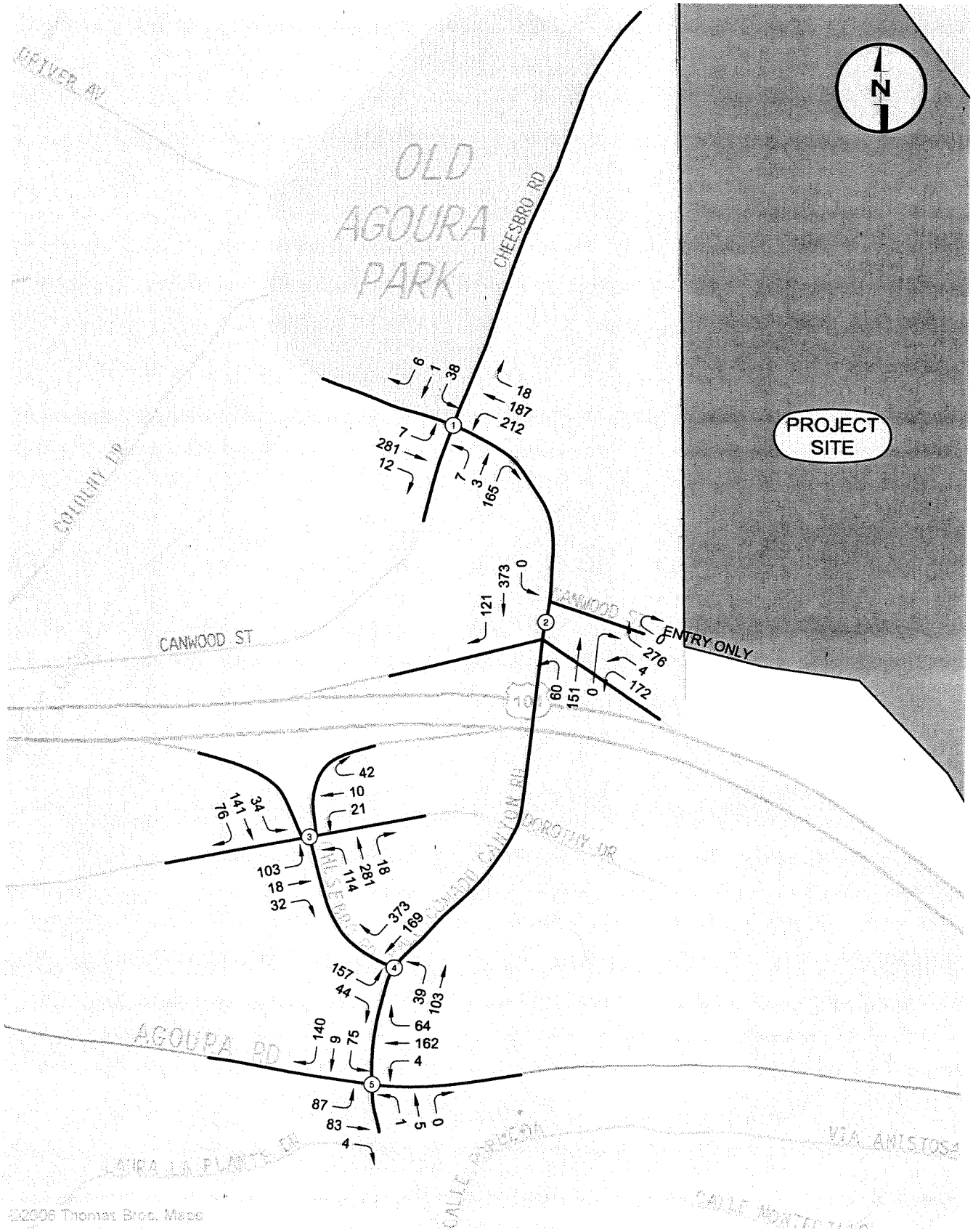

FIGURE 6(b)

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

EXISTING (2003) TRAFFIC VOLUMES
POST-AM PEAK HOUR

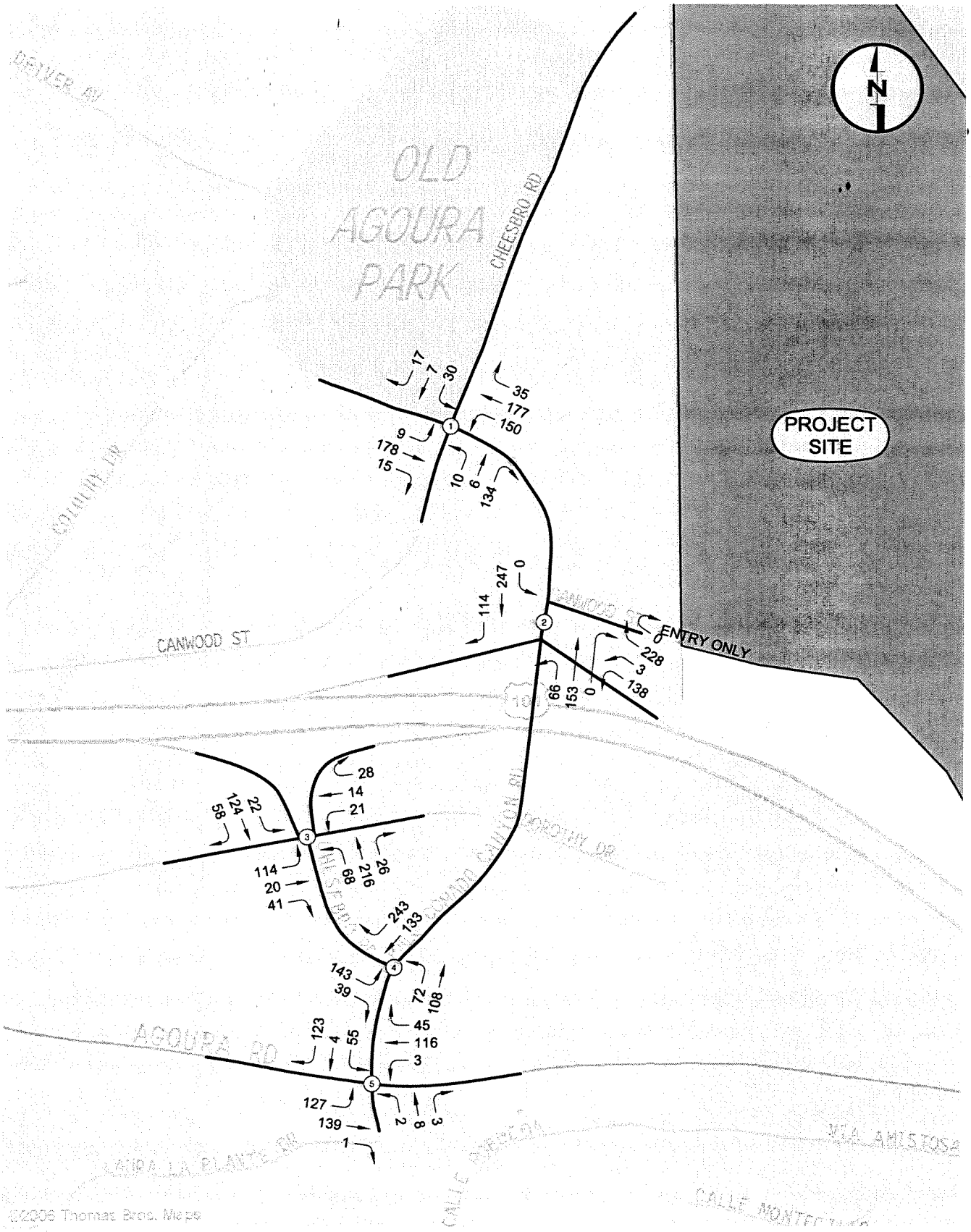

FIGURE 6(c)

3/1/2007

HIRSCH GREEN

Hirsch/Green Transportation Consulting, Inc.

EXISTING (2003) TRAFFIC VOLUMES
PRE-PM SCHOOL PEAK HOUR

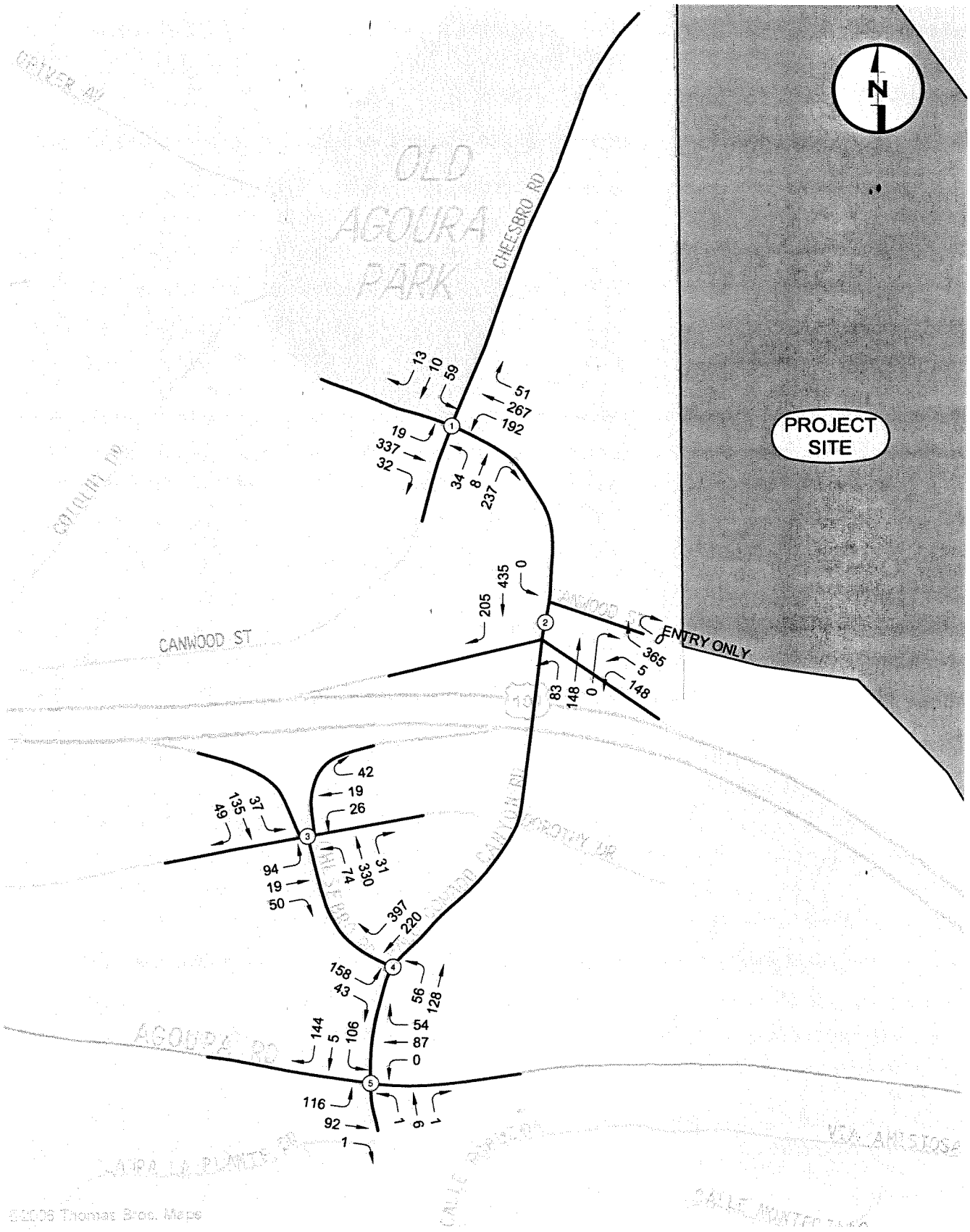

FIGURE 6(d)

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

EXISTING (2003) TRAFFIC VOLUMES
SCHOOL PM PEAK HOUR

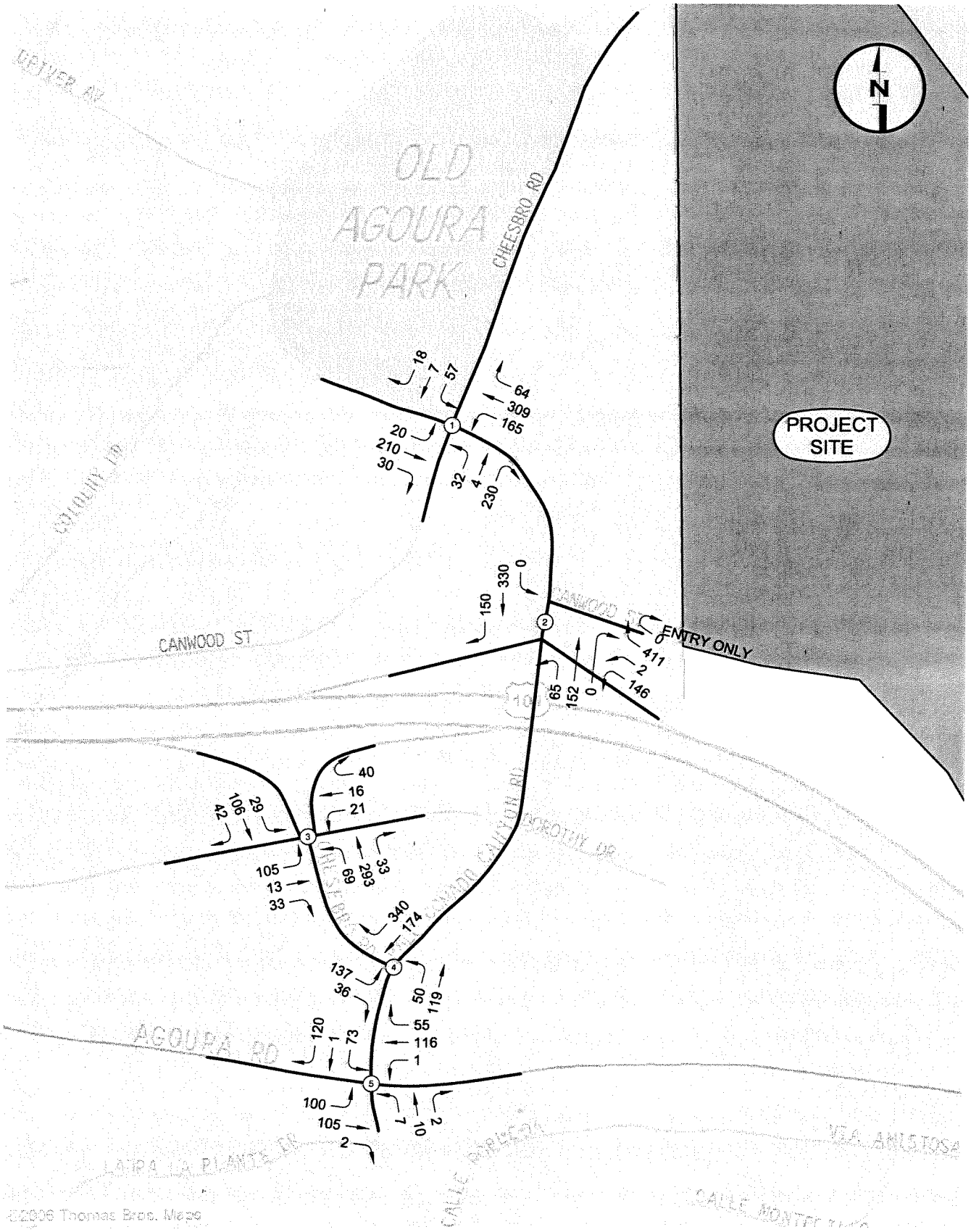

FIGURE 6(e)

2/27/2007

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

EXISTING (2003) TRAFFIC VOLUMES
PRE-PM PEAK HOUR

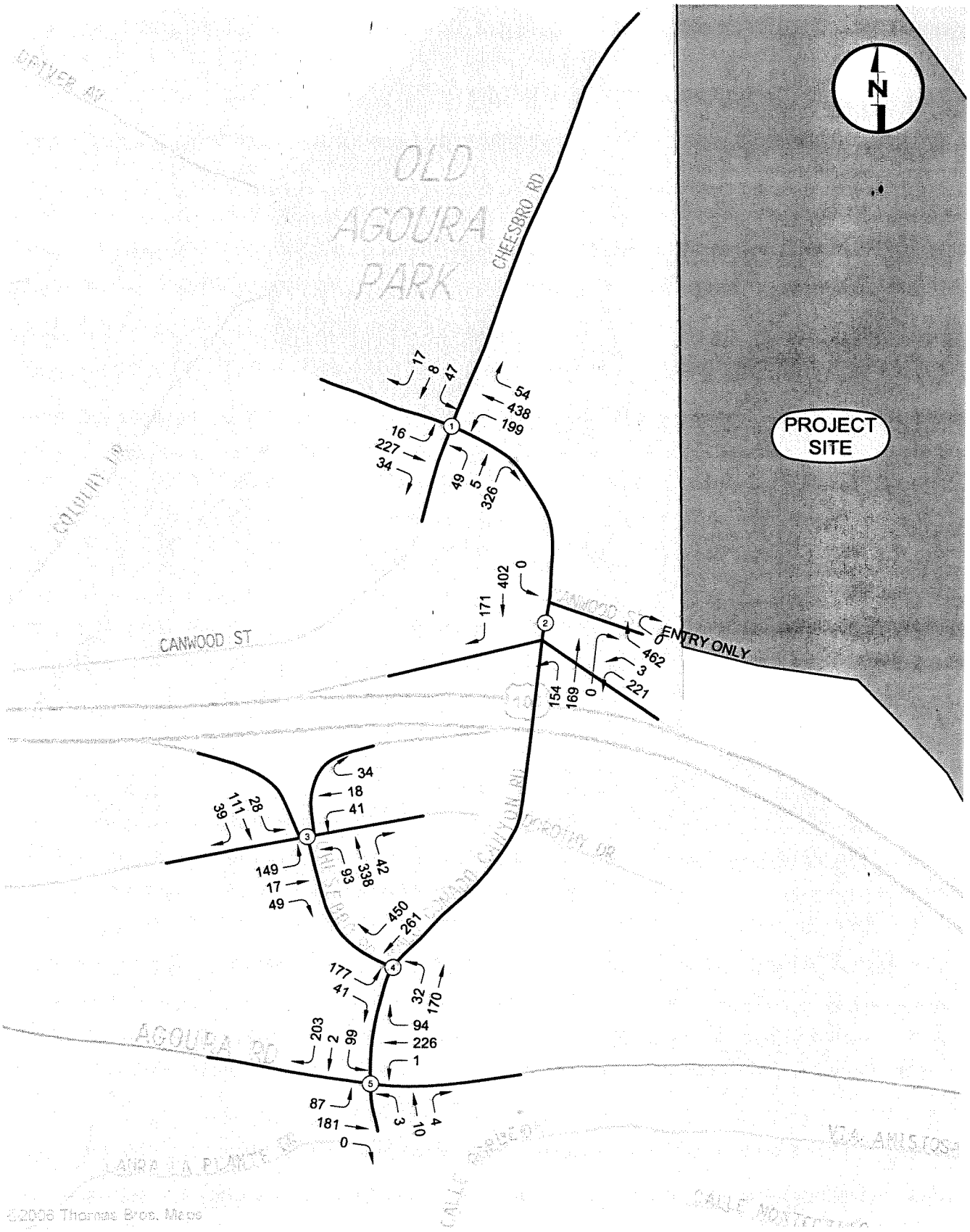

FIGURE 6(f)

HIRSCH GREEN

Hirsch/Green Transportation Consulting, Inc.

EXISTING (2003) TRAFFIC VOLUMES
PM PEAK HOUR

As described above, the traffic count volumes for the five study intersections during the AM peak hour, PM School peak hour, and PM peak hour conditions shown in Figures 6(a), 6(d) , and 6(f), respectively, were excerpted directly from the February 2005 Crain & Associates study, with the exception of the AM peak hour volumes at the intersections of Chesebro Road/US-101 Freeway Southbound On/Off-Ramps at Dorothy Drive, Chesebro Road and Palo Comado Canyon Road at Chesebro Road, and Chesebro Road and Laura La Plante Drive at Agoura Road. A review of the original traffic analyses for the AM peak hour conditions revealed that, while the AM peak hour at the other two intersections (Canwood Street/Chesebro Road at Driver Avenue/Palo Comado Canyon Road, and Palo Comado Canyon Road at US-101 Freeway Northbound On/Off-Ramps) actually occurred during the 7:00 to 8:00 AM time period identified in Table 1 for the proposed interim School trip generation, the peak hour for these three intersections occurred between 8:00 and 9:00 AM. Since this supplemental analysis includes the "Post-AM peak hour" as a separate time period, the AM peak hour volumes at these three locations were revised to reflect conditions during the 7:00 to 8:00 AM timeframe.

A summary of the existing operations at the five study intersections is presented in Table 2.[1] As with the "Existing" intersection traffic volumes shown in Figures 6(a), 6(d), and 6(f), the information contained in Table 2 relating to the typical AM peak hour, PM School peak hour, and PM peak hour is taken directly from the approved project traffic study, although as described above, the AM peak hour conditions at Chesebro Road/US-101 Freeway Southbound On/Off-Ramps at Dorothy Drive, Chesebro Road and Palo Comado Canyon Road at Chesebro Road, and Chesebro Road and Laura La Plante Drive at Agoura Road were modified to reflect the appropriate time period for this supplemental analysis. All other analyses, assumptions, and calculations contained in the approved traffic study and project DEIR/FEIR documents are incorporated in their entirety into this supplemental analysis by reference. Traffic conditions for the three additional "off peak" time periods were analyzed using the Critical Movement Analysis (CMA) methodologies detailed in the original traffic study. The supporting CMA analysis worksheets for the existing conditions volumes shown in Figures 6(a) through 6(f) and summarized in Table 2 are contained in the appendix of this report.

[1] A review of the approved traffic study indicates that the traffic volume count data for the study intersections were based on counts conducted in November of 2003. Due to the elapsed time between the count dates and the present day, the validity of the information was verified through a review of recent traffic study documents prepared for the City of Agoura Hills related to the proposed Agoura Village project. A graphical comparison of the Crain & Associates and Agoura Village traffic study volumes for "existing" conditions (year 2003 vs. year 2005) for the AM and PM peak hours is contained in the appendix of this report.

Table 2
Critical Movement Analysis Summary
Existing (2003/2007) Conditions

Int. No.	Intersection	Peak Period	CMA	LOS
1	Canwood St./Chesebro Rd. at Driver Ave./Palo Comado Cyn. Rd.	AM	0.616	B
		Post-AM *	0.508	A
		Pre-PM School *	0.368	A
		PM School	0.650	B
		Pre-PM	0.525	A
		PM	0.638	B
2	Palo Comado Cyn. Rd. at US-101 Fwy. NB Ramps [1]	AM	0.659	B
		Post-AM *	0.594	A
		Pre-PM School *	0.453	A
		PM School	0.740	C
		Pre-PM	0.673	B
		PM	0.851	D
3	Chesebro Rd./Us-101 Fwy. SB Ramps at Dorothy Dr.	AM	0.486	A
		Post-AM *	0.519	A
		Pre-PM School *	0.440	A
		PM School	0.551	A
		Pre-PM	0.505	A
		PM	0.631	B
4.	Chesebro Rd. & Palo Comado Cyn. Rd. at Chesebro Rd.	AM	0.412	A
		Post-AM *	0.424	A
		Pre-PM School *	0.338	A
		PM School	0.462	A
		Pre-PM	0.398	A
		PM	0.493	A
5.	Chesebro Rd. & Laura La Plante Dr. at Agoura Rd.	AM	0.308	A
		Post-AM *	0.452	A
		Pre-PM School *	0.396	A
		PM School	0.428	A
		Pre-PM	0.394	A
		PM	0.596	A

Notes:
[1] Includes Canwood St. approach.
* Based in full or in part on new 2007 traffic counts performed for this study.

Note that the values identified in Table 2 are the result of new CMA calculations prepared by Hirsch/Green for this supplemental analysis, based on the traffic volume and intersection data contained in the original, approved Crain & Associates traffic study. As a result, while identical to the approved traffic study in terms of traffic volumes, lane configurations, and intersection control assumptions, some of the "Existing" intersection conditions shown in Table 2 exhibit slightly different (± 0.001) CMA values compared to the original analyses. These differences are the result of minor traffic volume "rounding" differences between the Hirsch/Green and Crain & Associates CMA calculation programs. Any such differences are not significant in terms of the analysis, results, or conclusions of this study.

Analysis of Future (2010) Without Project Traffic Conditions

As noted earlier in this report, the focus of this supplemental impact analysis is to identify and document the potential impacts associated with a reduced 390-student Heschel School interim occupancy project, which is anticipated to occur within the future year 2010 horizon identified in the approved traffic study. Therefore, in order to provide a baseline for compatible comparisons and conclusions, the future (2010) "Without Project" traffic conditions identified in the approved study were replicated for this supplemental analysis. The Critical Movement Analysis (CMA) calculations contained in the February 2005 project traffic study were duplicated for use in the evaluation of both incremental "project-specific" and long-term "cumulative development" impacts to the study area intersections and roadways for the three typical peak periods (again with the exception of the AM peak hour modifications for three of the locations to account for the adjusted time periods contained in this supplemental analysis); new CMA analyses were performed for each of the study intersections for the three supplemental "off peak" periods described earlier. The supporting "Future (2010)" CMA calculations and worksheets for "Without Project", "With Interim Occupancy Project", and "With Cumulative Development" conditions are contained in the appendix of this document.

As detailed in the approved project traffic study, the Los Angeles County Department of Public Works requires a two-step process in the evaluation of future conditions and the assessment of potential project impacts. First, project-specific impacts on the future conditions are identified by using only the ambient growth traffic increases as the baseline, thereby isolating potential project traffic impacts from those of the cumulative development project is the study area. This step identifies project-specific impacts, and allows for the identification of project-specific mitigation measures, as necessary, at the study intersections.

Next, the cumulative traffic impacts of all development in the area, including the project itself, are evaluated to determine the ultimate traffic conditions in the future. This step allows for the identification of potential long-term roadway improvements that may be necessary to mitigate total anticipated traffic growth in the study area, but are beyond the scope of any particular development to implement. Project "fair share" contributions to any such cumulative improvements are also identified.

Both of these steps utilize the ambient-growth only conditions as the "Future (2010) Without Project" baseline traffic volumes, which were obtained directly from the approved February 2005 traffic study. As described in detail in that analysis, these future baseline traffic volumes were estimated by increasing the "existing" 2003/2007 traffic volumes at all of the study intersections by an "ambient" growth factor of 2.0 percent, compounded annually, per recommendations from the Los Angeles County Department of Public Works. This factor accounts for simple ambient increases in the number of vehicles on the roadway system over the course of time due to any of a number of reasons; increasing population (not specifically tied to development), additional vehicles for existing households (as children become driving age, or new multi-vehicle status for current single-vehicle families), economic factors such as new jobs creating new worker trips, and other factors. This growth factor is also used to account for increases in traffic resulting from potential development projects not yet proposed or outside of the study area. The 2.0 percent annual "ambient" traffic growth factor, compounded annually, was applied to the 2003/2007 traffic volumes to develop an estimate of the future year 2010 baseline volumes.

Therefore, the "Future (2010) Without Project" condition traffic volumes for the original approved project traffic analysis were developed by combining the assumed ambient traffic growth in the area with the existing (2003/2007) traffic volumes. The resulting AM and PM peak hour traffic estimates for the "Future (2010) Without Project" conditions are shown in Figure 7(a) for the AM peak hour, Figure 7(b) for the Post-AM peak hour, Figure 7(c) for the Pre-PM School peak hour, Figure 7(d) for the PM School peak hour, Figure 7(e) for the Pre-PM peak hour, and Figure 7(f) for the PM peak hour periods. These traffic estimates form the "benchmark" values for determining both project-specific and cumulative development traffic impacts on the anticipated future area intersections and street system.

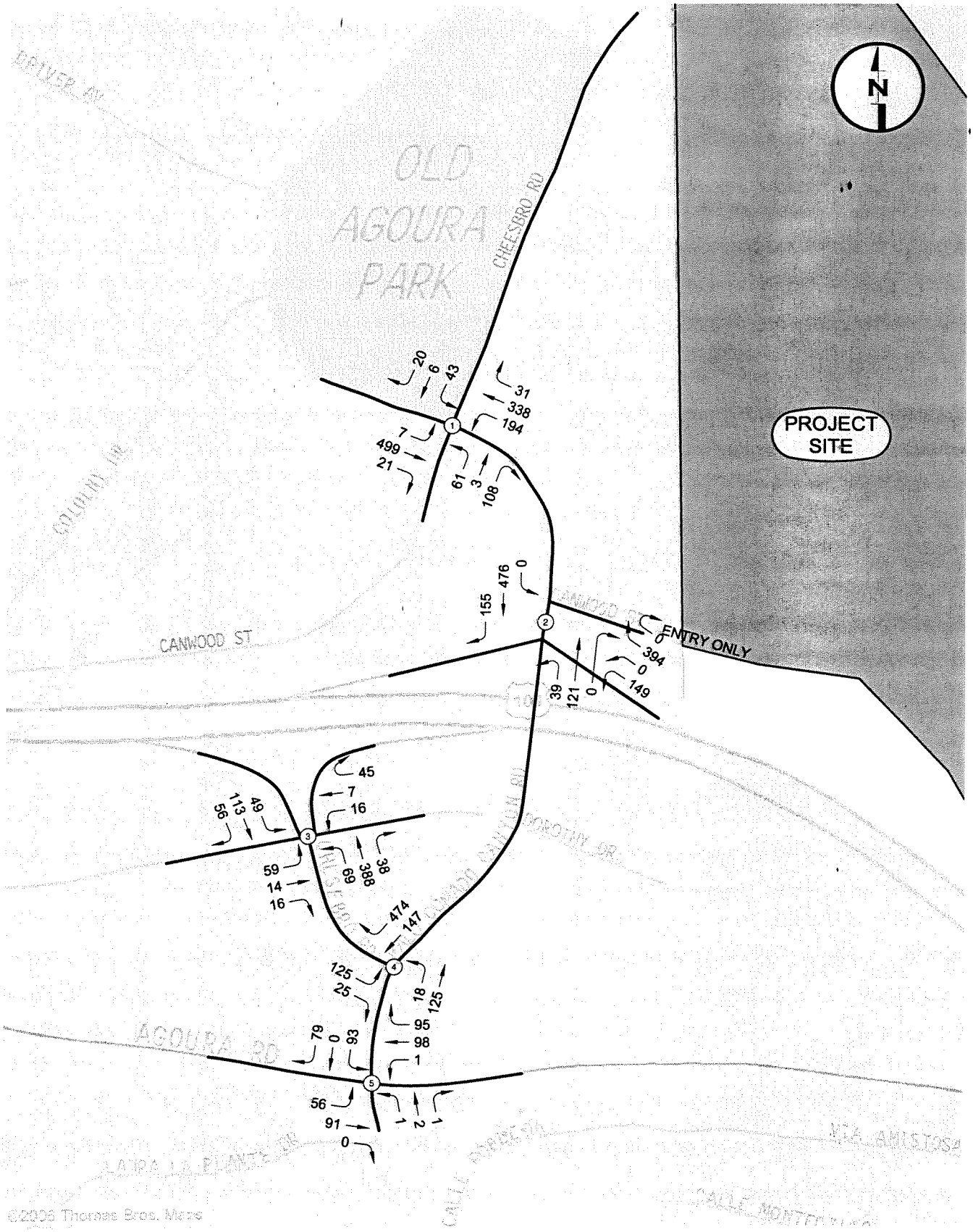

FIGURE 7(a)

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT PROJECT
(AMBIENT GROWTH ONLY)
AM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

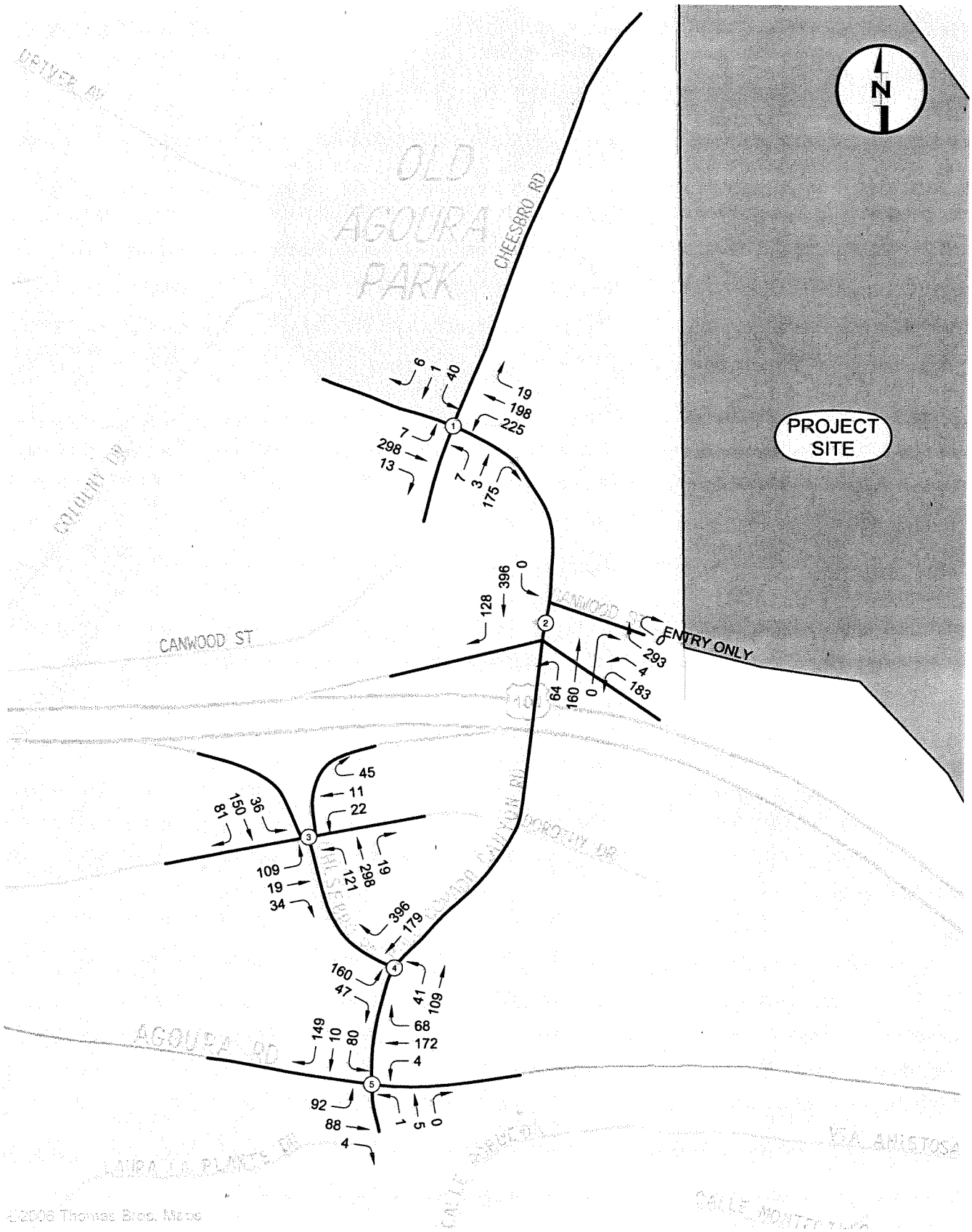

FIGURE 7(b)

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT PROJECT
(AMBIENT GROWTH ONLY)
POST-AM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

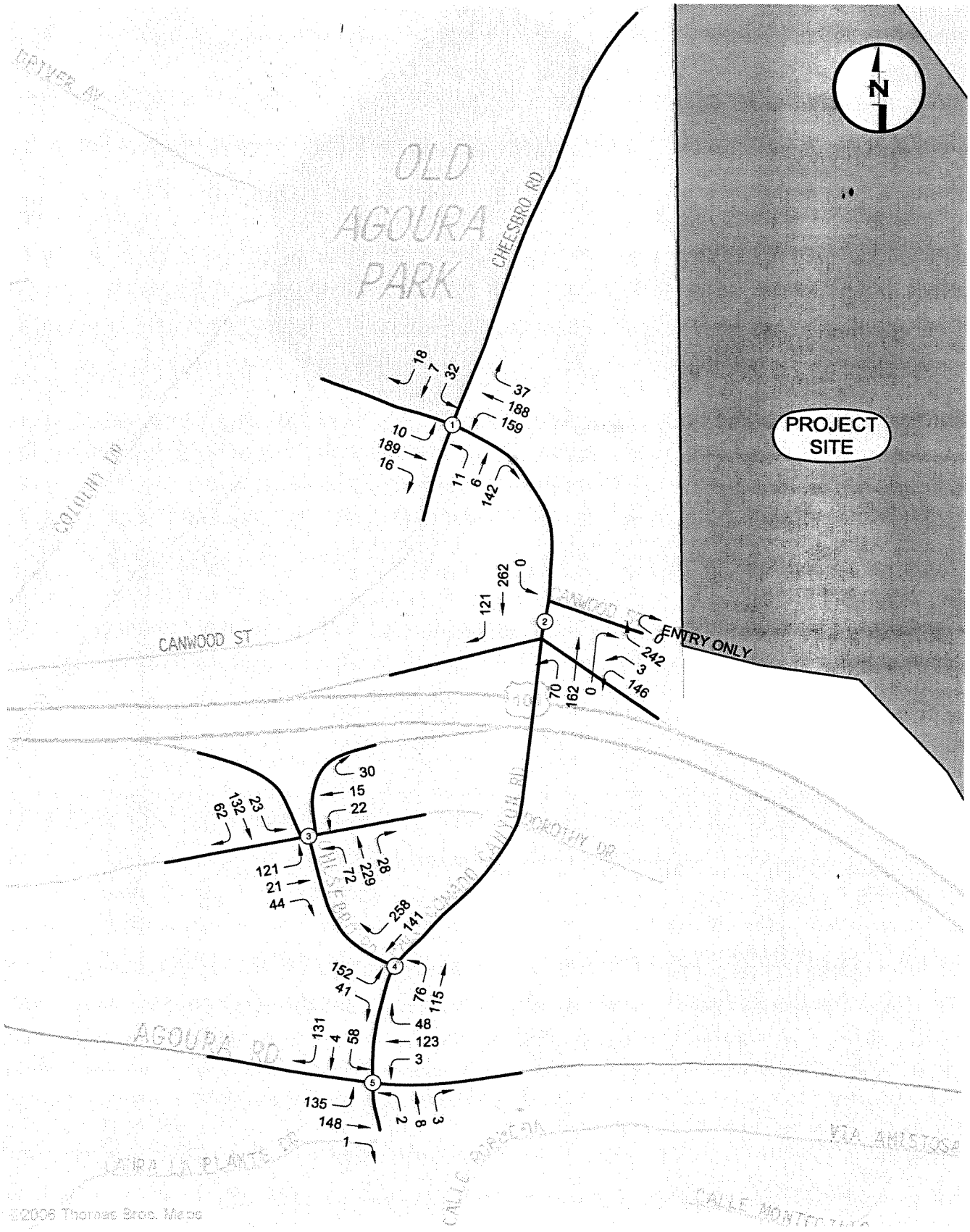

FIGURE 7(c)

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT PROJECT
(AMBIENT GROWTH ONLY)
PRE-PM SCHOOL PEAK HOUR

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Hirsch/Green Transportation Consulting, Inc.

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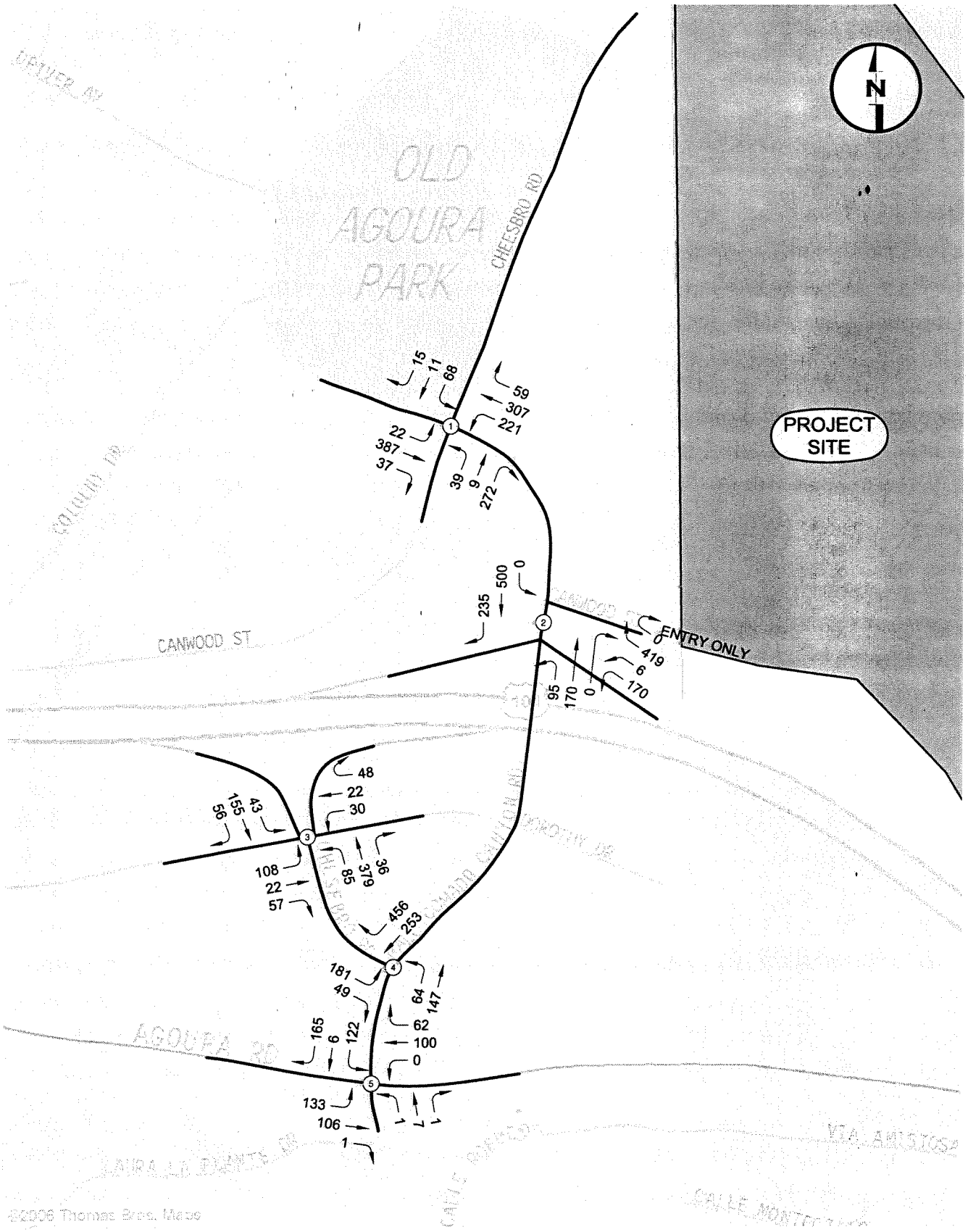

FIGURE 7(d)

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT PROJECT
(AMBIENT GROWTH ONLY)
SCHOOL PM PEAK HOUR

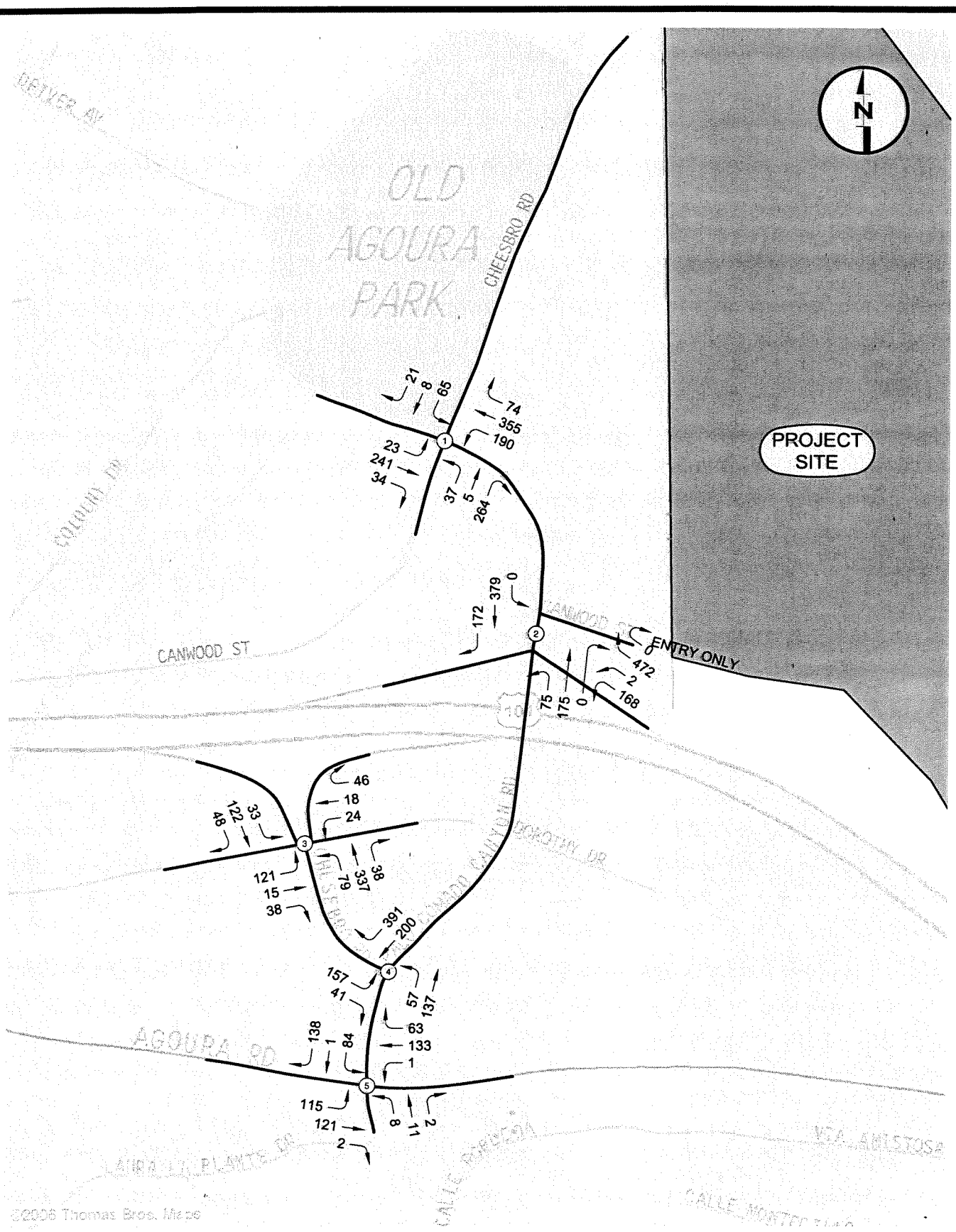

FIGURE 7(e)

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT PROJECT
(AMBIENT GROWTH ONLY)
PRE-PM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

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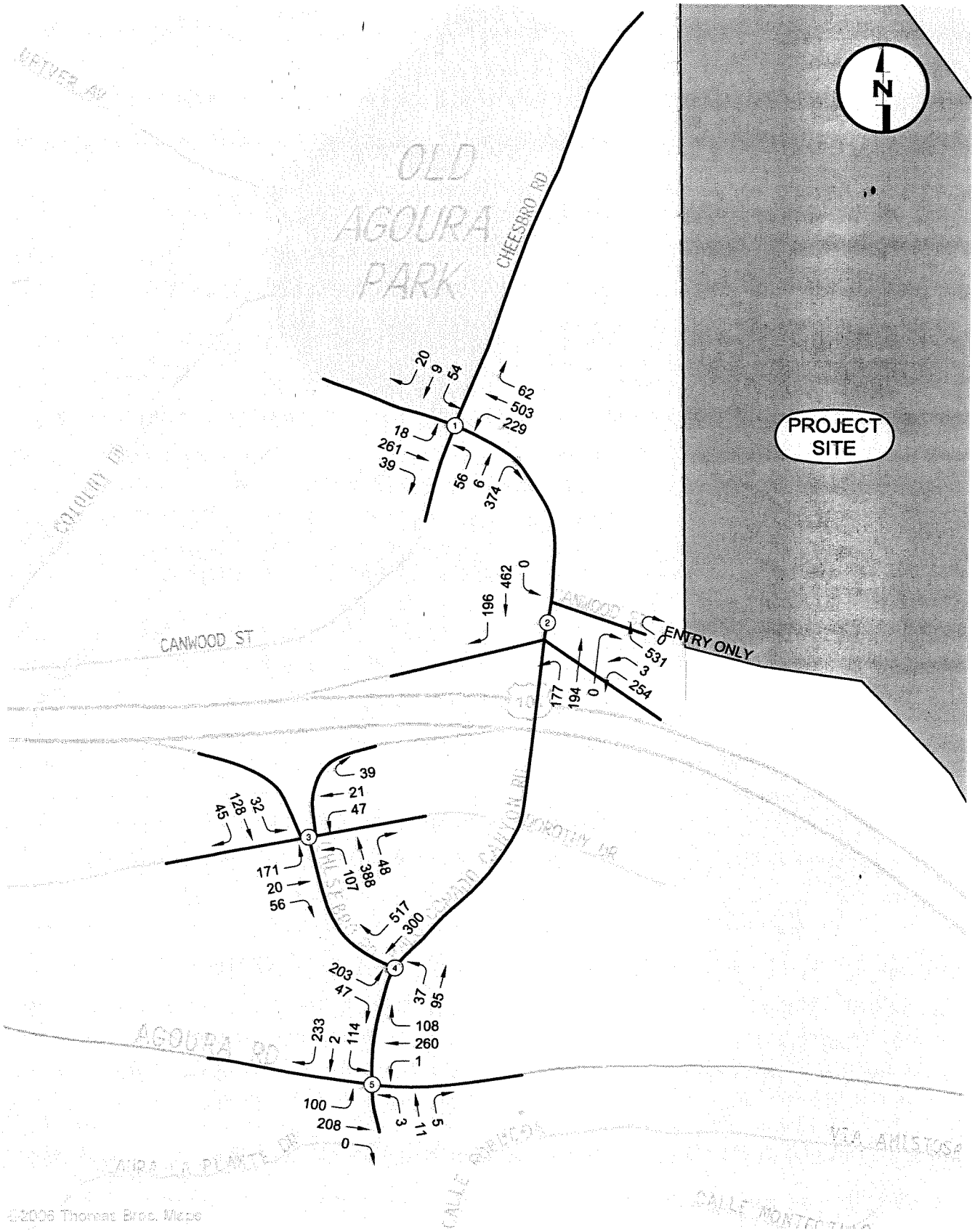

FIGURE 7(f)

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT PROJECT
(AMBIENT GROWTH ONLY)
PM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

Analysis of Project-Specific Impacts of Proposed One-Way Loop and Busing Program

Next, the incremental impacts of the proposed bus plan traffic at each of the study intersections during each of the analysis periods were calculated. As described previously, this analysis was based on the traffic study forecasts of "Future (2010) Without Project" (ambient traffic growth scenario) contained in the approved project traffic study, and shown earlier in Figures 7(a) through 7(f), in order to provide a comparable assessment of potential interim bus program trips versus the original "full enrollment" project impact analyses. The net project trips shown previously in Figures 5(a) through 5(f) were added to the "Future (2010) Without Project" baseline traffic volumes to produce the anticipated "Future (2010) With Interim Busing Program" conditions at the study intersections. The occupancy of the new School site will include the incorporation of existing students from the current Heschel School site near Liberty Canyon Road and their associated trips, which are intrinsically included in the new project trip generation estimates shown in Table 1. Therefore, so as not to "double count" these student-related trips and overestimate the number on "net new" trips resulting from the interim School activity, these existing student trips were subtracted from the future conditions for the AM peak hour, PM School peak hour, and PM peak hour conditions. However, as described earlier in the discussion of the project trip generation calculation iterative process, no "existing" student trip credits were assumed for the "off peak" time periods, since no data was collected regarding the existing site trip generation during these times. Although it is expected that some "off peak" trip activity currently exists, this assumption guarantees a "worst case" assessment of potential impacts during the "off peak" hours. It is also of note that these existing student trips are primarily automobile trips, carrying only one to a few students each. The proposed busing program will therefore replace several existing School trips with a single bus trip, resulting in decreases to certain traffic volumes at some of the study intersections even though the number of total students will increase from current levels.

The resulting "Future (2010) With Interim Busing Program" traffic volumes at the study intersections, including the "net" effects of the addition of School faculty/staff and 390-student busing program, plus the removal of the existing student-related trips associated with the existing Heschel School, are shown in Figure 8(a) for the AM peak hour, Figure 8(b) for the Post-AM peak hour, Figure 8(c) for the Pre-PM School peak hour, Figure 8(d) for the PM School peak hour, Figure 8(e) for the Pre-PM peak hour, and Figure 8(f) for the PM peak hour periods.

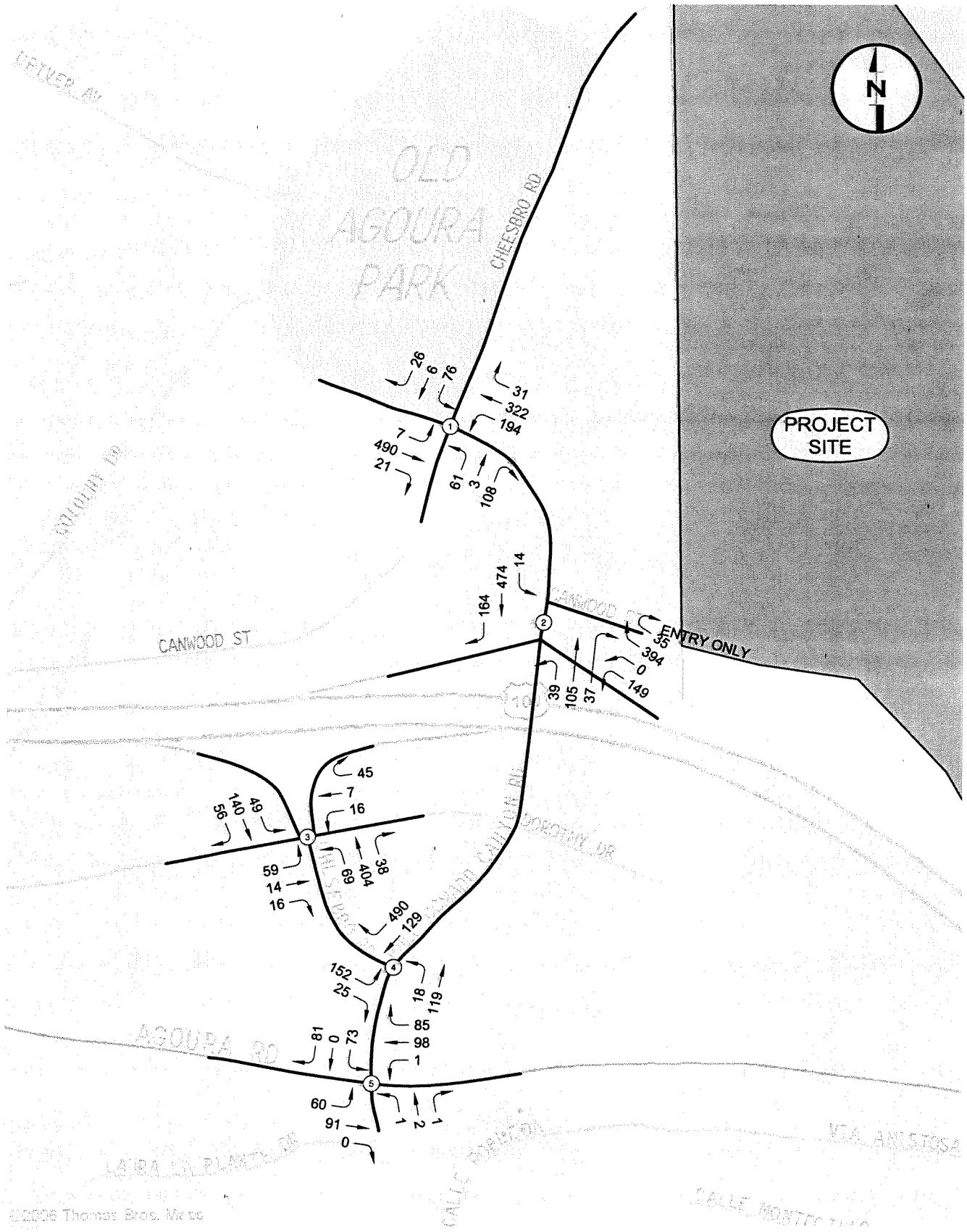

FIGURE 8(a)

FUTURE (2010) TRAFFIC VOLUMES
WITH PROJECT
(INCLUDING REMOVAL OF EXISTING SCHOOL TRIPS)
AM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

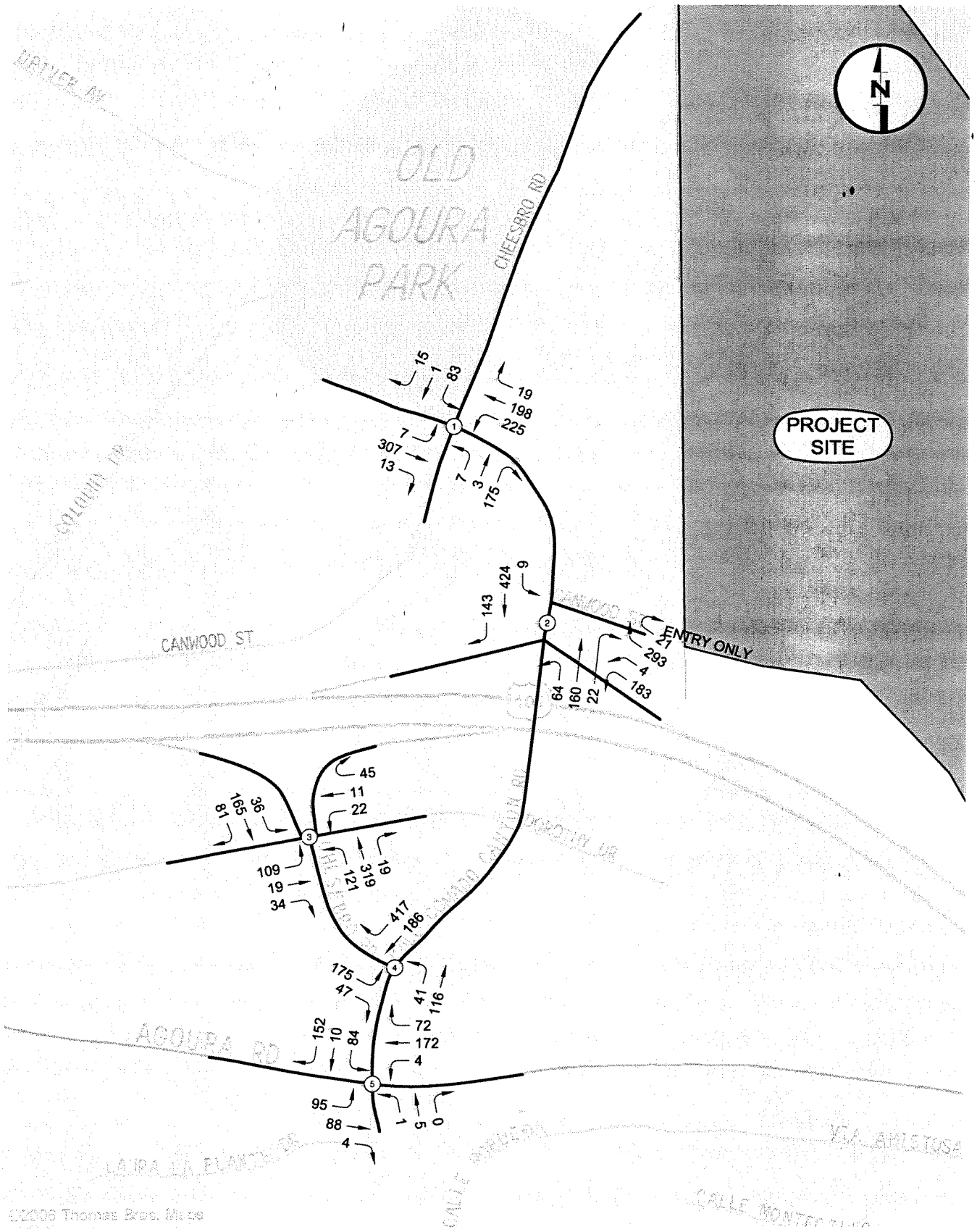

FIGURE 8(b)

FUTURE (2010) TRAFFIC VOLUMES
WITH PROJECT
POST-AM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

3/1/2007

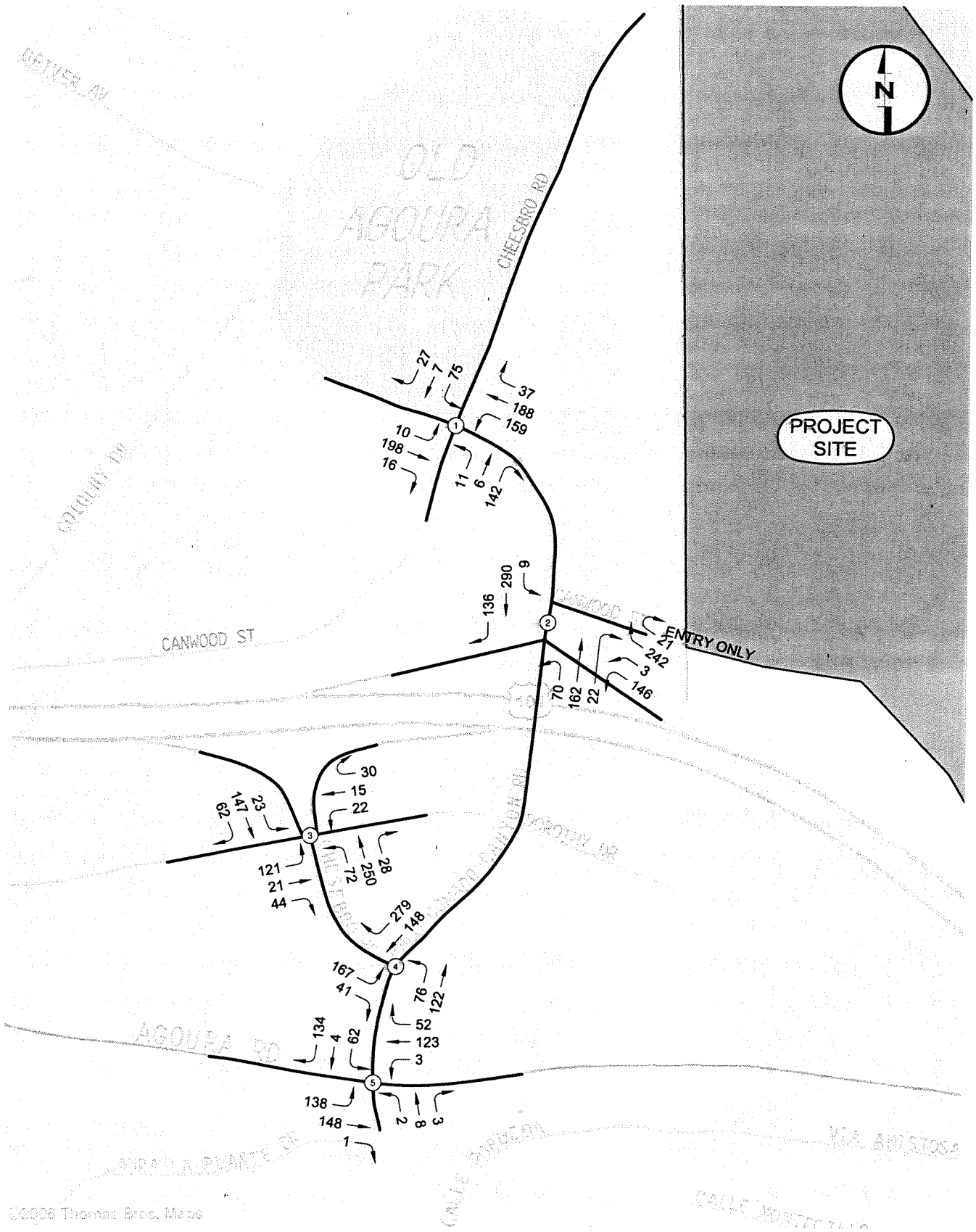

FIGURE 8(c)

HIRSCH GREEN

Hirsch/Green Transportation Consulting, Inc.

FUTURE (2010) TRAFFIC VOLUMES
WITH PROJECT
PRE-PM SCHOOL PEAK HOUR

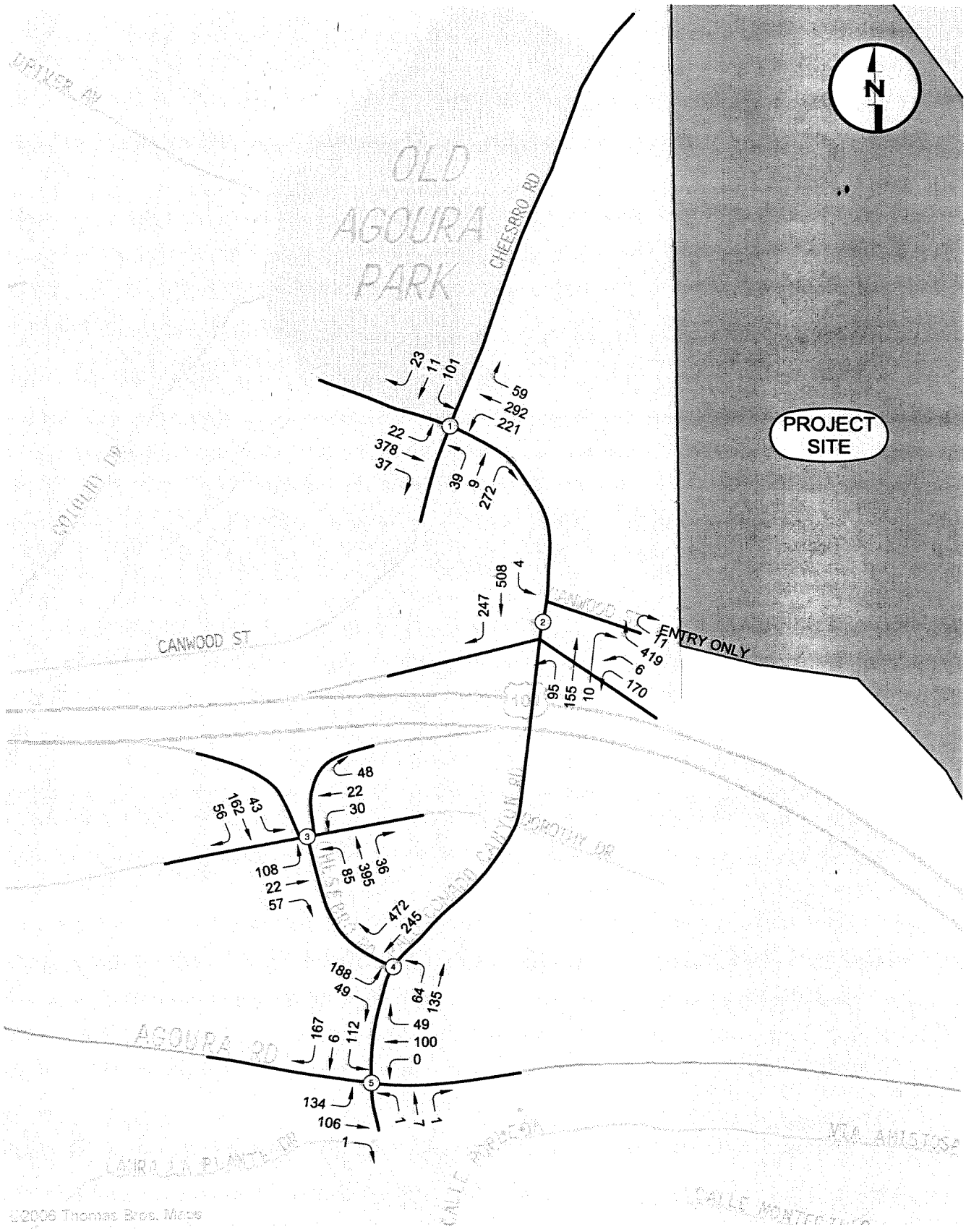

FIGURE 8(d)

FUTURE (2010) TRAFFIC VOLUMES
WITH PROJECT
(INCLUDING REMOVAL OF EXISTING SCHOOL TRIPS)
SCHOOL PM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

2/12/2007

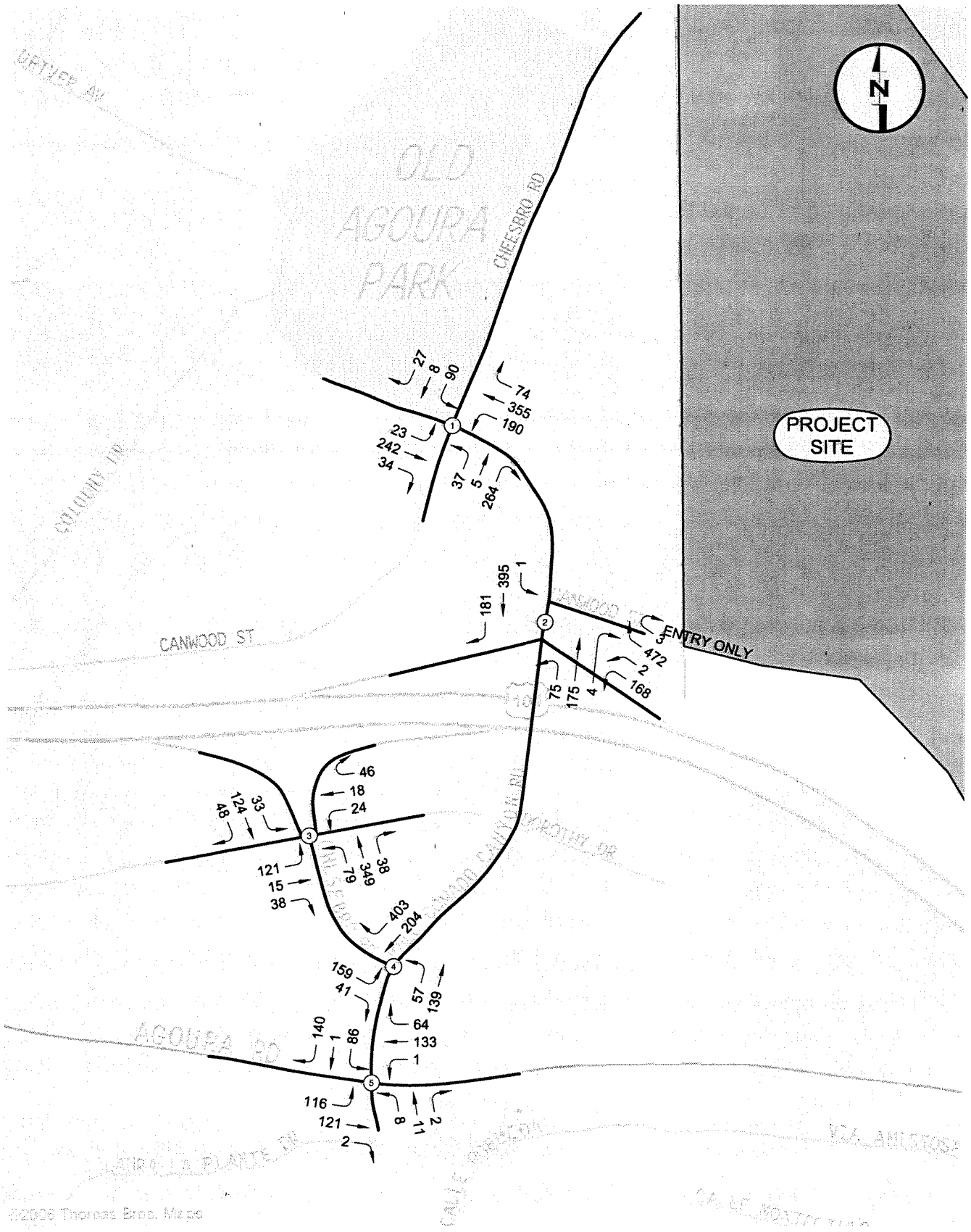

FIGURE 8(e)

HIRSCH GREEN

Hirsch/Green Transportation Consulting, Inc.

FUTURE (2010) TRAFFIC VOLUMES
WITH PROJECT
PRE-PM PEAK HOUR

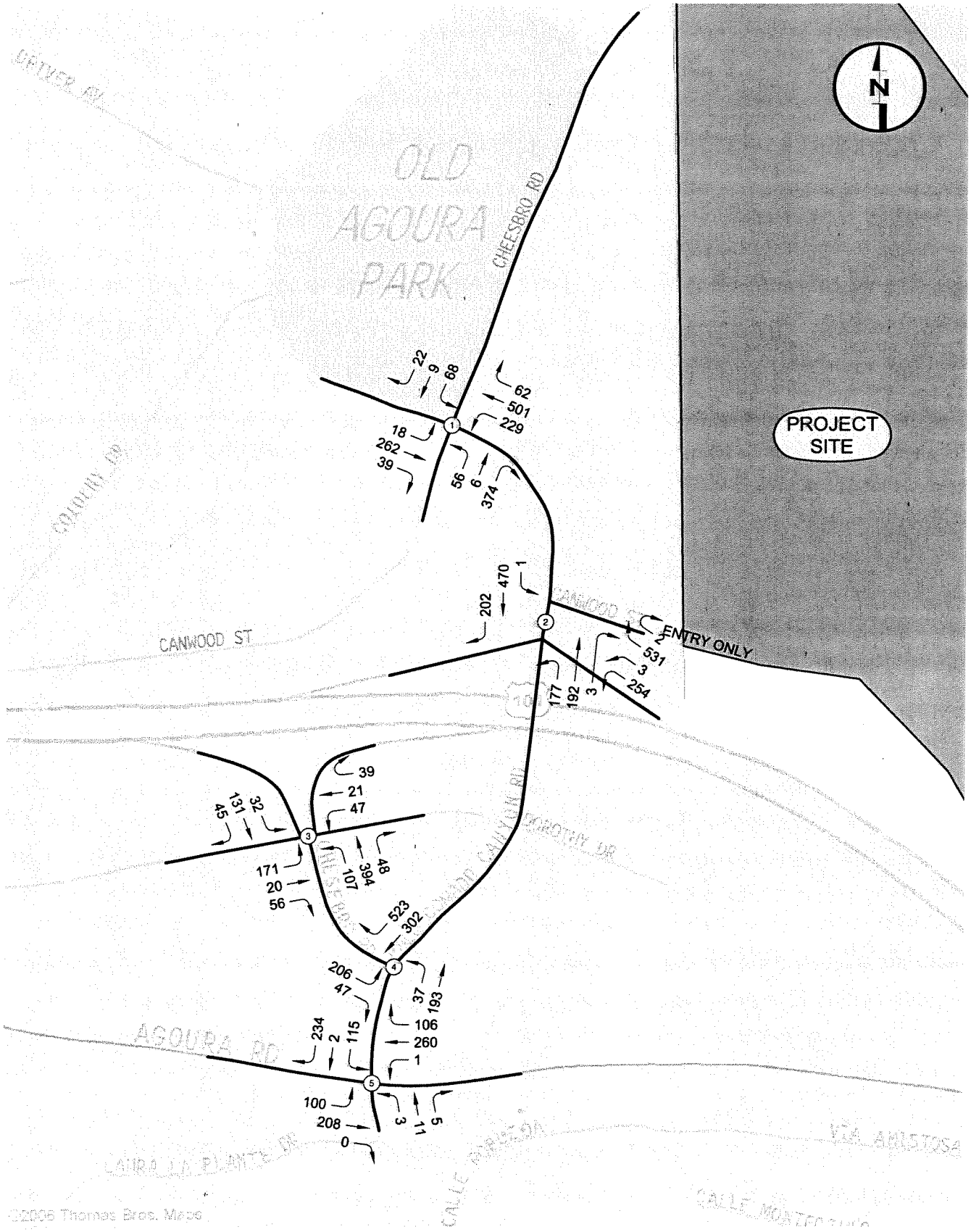

FIGURE 8(f)

FUTURE (2010) TRAFFIC VOLUMES
WITH PROJECT
(INCLUDING REMOVAL OF EXISTING SCHOOL TRIPS)
PM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

2/12/2007

Finally, both the 'Future (2010) Without Project" traffic volumes shown in Figure 7(a) through Figure 7(f) and the Future (2010) With Interim Busing Program" traffic volumes shown in Figure 8(a) through Figure 8(f) were evaluated using the same Critical Movement Analysis (CMA) methodologies and assumptions detailed earlier in this study; the differences between the "Without" and "With" project scenarios indicates the incremental traffic impacts directly attributable to the proposed busing program at each of the study intersections during each of the analysis periods. The results of these analyses are summarized in Table 3. Once again, note that the values identified in Table 3 for the "Without Project" conditions are the result of new CMA calculations prepared by Hirsch/Green for this supplemental analysis, and may exhibit slightly different CMA values compared to the original analyses. These differences are not significant in terms of the analysis, results, or conclusions of this study.

The Los Angeles County Department of Public Works defines a significant traffic impact at intersections based on a "stepped scale", with intersections at high volume-to-capacity ratios and levels of service exhibiting more sensitivity to additional traffic than those operating at better levels of service. A significant impact is identified as an increase in the CMA value of 0.040 or more when the final ("With Project") Level of Service is LOS C (CMA range 0.701 to 0.800), a CMA increase of 0.020 or more at LOS D (CMA range 0.801 to 0.900), or a CMA increase of 0.010 or more at LOS E or F (CMA range 0.901 or greater). No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic flows.

Using these criteria, the incremental project impacts shown in Table 3 were evaluated, and indicate that a proposed interim Heschel School 390-student occupancy level, including the "one-way loop" access and student busing program described above, would not produce any significant impacts at any of the five study intersections during any of the three peak analysis periods. As a result, the proposed interim School would not require any intersection mitigation improvements, thereby achieving the goals identified at the outset of this supplemental analysis. By comparison, the originally-approved 750-student project would result in significant impacts during one or more of the peak periods at three of the study intersections, Driver Avenue/Palo Camodo Canyon Road at Canwood Street/Chesebro Road, Canwood Street/Palo Comado Canyon Road at the US-101 Northbound Ramps, and at Dorothy Drive and US-101 Southbound Freeway Ramps, as noted earlier in this report.

Table 3
Critical Movement Analysis Summary
Future (2010) Without and With Interim Busing Program Conditions

Int. No.	Intersection	Peak Period	Without Project CMA	Without Project LOS	With Interim Student Busing Program CMA	With Interim Student Busing Program LOS	Impact
1	Canwood St./Chesebro Rd. at Driver Ave./Palo Comado Cyn. Rd.	AM	0.709	C	0.734	C	0.025
		Post-AM	0.538	A	0.582	A	0.044
		Pre-PM School	0.390	A	0.433	A	0.043
		PM School	0.748	C	0.767	C	0.019
		Pre-PM	0.602	B	0.623	B	0.021
		PM	0.733	C	0.743	C	0.010
2	Palo Comado Cyn. Rd. at US-101 Fwy. NB Ramps [1]	AM	0.758	C	0.797	C	0.039
		Post-AM	0.631	B	0.679	B	0.048
		Pre-PM School	0.481	A	0.529	A	0.048
		PM School	0.850	D	0.869	D	0.019
		Pre-PM	0.773	C	0.790	C	0.017
		PM	0.978	E	0.987	E	0.009
3	Chesebro Rd./Us-101 Fwy. SB Ramps at Dorothy Dr.	AM	0.559	A	0.573	A	0.014
		Post-AM	0.551	A	0.568	A	0.017
		Pre-PM School	0.467	A	0.484	A	0.017
		PM School	0.633	B	0.647	B	0.014
		Pre-PM	0.580	A	0.590	A	0.010
		PM	0.724	C	0.729	C	0.005
4.	Chesebro Rd. & Palo Comado Cyn. Rd. at Chesebro Rd.	AM	0.473	A	0.498	A	0.025
		Post-AM	0.450	A	0.474	A	0.024
		Pre-PM School	0.359	A	0.383	A	0.024
		PM School	0.529	A	0.546	A	0.017
		Pre-PM	0.456	A	0.467	A	0.011
		PM	0.566	A	0.573	A	0.007
5.	Chesebro Rd. & Laura La Plante Dr. at Agoura Rd.	AM	0.353	A	0.333	A	-0.020
		Post-AM	0.480	A	0.492	A	0.012
		Pre-PM School	0.420	A	0.432	A	0.012
		PM School	0.491	A	0.474	A	-0.017
		Pre-PM	0.453	A	0.458	A	0.005
		PM	0.684	B	0.684	B	0.000

Notes:
[1] Includes Canwood St. approach.

It is also understood that although the proposed interim student busing program for the Heschel School will not result in any significant impacts to any of the study intersections based on the CMA analyses described above, incremental project trips will add to existing delays experienced at all of the study locations. These incremental project-related delays are anticipated to be nominal, however, in light of the substantially-reduced trip generation levels associated with the interim School, and are not considered to be significant. The potential for additional delay is noted in the original traffic analyses, and would be alleviated through installation of new traffic signals. However, the City of Agoura Hills has voiced objections to installation of traffic signals in the study area due to the rural nature of the vicinity, even though the original analyses indicated that many of the study intersections currently meet warrants for traffic signalization, prior to either project-specific or cumulative traffic additions.

Analysis of Interim Project Impacts to Neighborhood Streets

The results of the analysis of the proposed interim Heschel School operations indicate that no significant traffic impacts are anticipated at any of the five study intersections. However, the potential for impacts to the local/residential streets surrounding the project site were also investigated, since the proposed "one-way loop" access scheme would divert all of the School's "outbound" traffic to Chesebro Road, whereas the original project access scenarios added little or no new trips to this roadway.

The methodology used to determine impacts on local/neighborhood streets is based on daily (24-hour) traffic volumes along each street, rather than on the "peak hour" methodology described earlier for the study intersection impact analyses. The approved Crain & Associates traffic study identified six local/neighborhood street segments surrounding the project site for detailed analyses. Again using that document as a resource, the future (year 2010) average daily traffic (ADT) volumes on these facilities were identified.

Next, using the daily trip generation estimates summarized earlier in Table 1, and the revised, "one-way loop" access scenario project traffic distributions shown in Figure 4, the amount of daily project-related trips along each of the studied local/neighborhood street segments was calculated. These "net" new project traffic volumes also account for the removal of approximately 135 daily trips along the Driver Avenue/Palo Comado Canyon Road corridor, as these student-related vehicle trips are eliminated through their incorporation into the student busing program, or by the relocation of the existing student population from the Liberty Canyon site to the proposed new School location. The future (year 2010) "Without" and "With Interim Student Busing Program" local/neighborhood street daily traffic volumes are shown in Table 4.

Table 4
Local/Neighborhood Street Average Daily Traffic Impact Analysis
Future (2010) Without and With Interim Student Busing Program Conditions

Street/Segment	Without Project ADT	Net Project * ADT	With Project ADT	Project Impact	Significance Threshold	Significant Impact
Driver Ave. W/o Chesebro Rd.	10,190	(53)	10,137	-0.5%	8.0%	No
Chesebro Rd. N/o Driver Ave.	1,770	229	1,999	11.5%	12.0%	No
Palo Comado Cyn. Rd. E/o Chesebro Rd.	9,540	94	9,634	1.0%	8.0%	No
Canwood St. S/o Driver Ave.	5,660	0	5,660	0.0%	8.0%	No
Driver Ave. W/o Colodny Dr.	8,950	(53)	8,897	-0.6%	8.0%	No
Chesebro Rd. N/o Agoura Park	1,660	0	1,660	0.0%	12.0%	No

Note:
"*" Includes reductions in traffic resulting from removal of existing Heschel School student vehicles and incorporation of these trips into proposed student busing program.

The Los Angeles County Department of Public Works - Traffic and Lighting Division does not currently have in place any criteria for determining the significance of project traffic additions to low-volume residential streets. Therefore, for the purposes of this analysis, the significance criteria for assessing a project's traffic impact on local residential streets was based on the criteria defined by the City of Los Angeles Department of Transportation (LADOT) in their most recent traffic impact analysis guidelines[2]. Those guidelines indicate that, for streets with less than 1,000 vehicles per day, a significant impact is defined as an increase of 16 percent or more in the total future daily traffic volumes (including ambient traffic growth, cumulative development traffic, and project-related trips) on the street. For roadways carrying between 1,000 and 2,000 daily trips, an significant impact occurs at an increase of 12 percent or more of the total future traffic on the street; for streets with between 2,000 and 3,000 daily trips, a 10 percent increase is deemed to constitute a significant impact, and for roads with more than 3,000 daily trips, an 8 percent increase is the threshold.

[2] Los Angeles Department of Transportation (LADOT), *Traffic Study Policy and Procedures*, Revised March 2002.

As shown in Table 4, the net impacts of the proposed interim Heschel School (with student busing program and "one-way loop" access scheme) on the surrounding local/neighborhood streets are well below the generally recognized thresholds for significance, and in fact, the implementation of the proposed interim student busing program actually produces a net decrease in daily trips on some roadway segments in the project vicinity due to the elimination of the existing student trips. Additionally, as would be expected, the impacts of the proposed interim student busing program are far below those identified in the original traffic study, with the exception of the segment of Chesebro Road between the proposed project access and Driver Avenue/Palo Comado Canyon Road. However, the impact to this segment of the roadway is expected to be far less than the identified significance threshold, since the proposed "one-way loop" access operations limit new project trips to Chesebro Road to outbound traffic only. Therefore, the proposed interim Heschel School "one-way loop" and student busing program operations are not expected to produce any significant impacts to the local/neighborhood streets surrounding the project site, and again no mitigation measures are warranted.

The analyses summarized above reflect the potential impacts of a "worst case" trip generation assessment for the proposed student busing program. More specific details of the proposed student busing program, including current Heschel School student residence locations, and conceptual student pick up points and bus routes, are contained in the attachments. These details provide guidelines for achieving a carpool/busing program that conforms to the trip generation analyses (maximum allowable passenger car equivalency "trip caps" during specific time periods) provided in this report. However, in general, the preceding analyses confirm the feasibility of implementation of a student carpool/busing program that will not significantly impact the surrounding area. It is important to note that the program described in these analyses represent only one possible variation of the final program, as a means of providing reasonable numerical analysis of potential impacts and operations of such a program.

Analysis of Interim Project Impacts on Regional Transportation System

To address the increasing public concern that traffic congestion was impacting the quality of life and economic vitality of the State of California, the Los Angeles County Congestion Management Program (CMP)[3] was enacted to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. A countywide approach has been established by the Metropolitan Transportation Authority, the

[3] *2004 Congestion Management Program for Los Angeles County*, Los Angeles County Metropolitan Transportation Authority, Los Angeles, 2004.

local CMP agency, to implement the statutory requirements of the CMP. The countywide approach includes designating a highway network that includes all state highways and principal arterials within the County and monitoring the network's Level of Service standards.

The CMP project traffic impact analysis (TIA) guidelines require analyses of all CMP monitoring intersections where the project could add a total of 50 or more trips during either peak hour. Additionally, all freeway segments where a project could add 150 or more trips in either direction during the peak hours must be analyzed.

A detailed analysis of both the CMP arterial monitoring intersections and freeway segments applicable to the project vicinity is included in the approved project's traffic study and EIR. Those analyses concluded that no significant traffic impacts would result from the full-enrollment project (750 students) at any arterial monitoring intersection or freeway segment. Since the proposed interim student busing program and reduced enrollment limits result in a substantial decrease in both daily and peak hour traffic volumes for the School, no significant impacts from this less intensive interim condition are anticipated, and no further CMP analyses are warranted.

Analysis of Future (2010) Cumulative Impacts

While the preceding analyses clearly demonstrate that the proposed Heschel School Interim One-Way Access Loop/Student Busing Program itself will not result in significant traffic impacts to any of the area study intersections or local/residential streets, it will add incrementally to anticipated future traffic growth in the vicinity, including both "localized" traffic increases resulting from the ongoing development of other projects within the immediate study area, including projects within Los Angeles County and the City of Agoura Hills, as well as "pass through" or commuter traffic resulting from more distant development.

As detailed earlier in this report, the forecast "Future (2010) Without Project" conditions already account for anticipated "ambient" traffic growth potential in the study area resulting from increases in traffic produced by already existing development (due to additional or new vehicles within existing households, business expansion, etc.), or from developments that are not yet proposed or are outside the study area. However, additional traffic is also anticipated from a number of specific new developments within the study area that are either proposed, approved but not yet under development, or are currently under construction.

A detailed listing of the anticipated future "cumulative" development projects are contained in the approved project traffic study, and are again utilized for this supplemental analysis in order to provide consistency with the previous analyses; that listing is incorporated herein by reference[4]. The anticipated future traffic additions to the study intersections resulting from these "related projects" are shown for the AM peak hour, Post-AM peak hour, PM School Peak, and PM peak hour analysis periods in Figure 9(a), Figure 9(b), Figure 9(c), and Figure 9(d), respectively. Note that the cumulative traffic volumes for the Post-AM peak hour were estimated at approximately 60 percent of the typical AM peak hour cumulative trips. Cumulative development traffic for the "Pre-PM School peak hour" and "Pre-PM peak hour" were assumed to be equal to the "PM School peak hour" volumes contained in the original analyses.

This cumulative development traffic was added to the "With Interim School Project" traffic conditions shown in Figures 8(a) through 8(f) in order to produce an estimate of the future "With Cumulative Development" conditions, which also includes the traffic generated by the proposed Heschel School Interim Student Carpool/Busing Program. The resulting cumulative traffic volumes at the study intersections are shown in Figure 10(a) for the AM peak hour, Figure 10(b) for the Post-AM peak hour, Figure 10(c) for the Pre-PM School peak hour, Figure 10(d) for the PM School peak hour, Figure 10(e) for the Pre-PM peak hour, and Figure 10(f) for the PM peak hour periods.

The "With Cumulative Development" forecast future traffic volume scenario was then analyzed using the CMA methodology described previously, and the resulting CMA values and corresponding levels of service for each intersection were determined. The difference in CMA values between the "Without Project" and "With Cumulative Development" conditions represents the total anticipated (cumulative) future traffic impacts to each of the study intersections, including the proposed interim Heschel School project. The results of the analysis of future (year 2010) cumulative conditions are shown in Table 5.

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[4] As with the "Existing" counts utilized for this analysis, due to the elapsed time between the date of the original traffic study cumulative developments listing and the present day, the validity of the information was verified through a review of recent traffic study documents prepared for the City of Agoura Hills related to the proposed Agoura Village project. A graphical comparison of the Crain & Associates and Agoura Village traffic study volumes for "future" conditions ("ambient growth plus cumulative development" for the Heschel data, and "with project" conditions for the Agoura Village report for the AM and PM peak hours is contained in the appendix of this report.

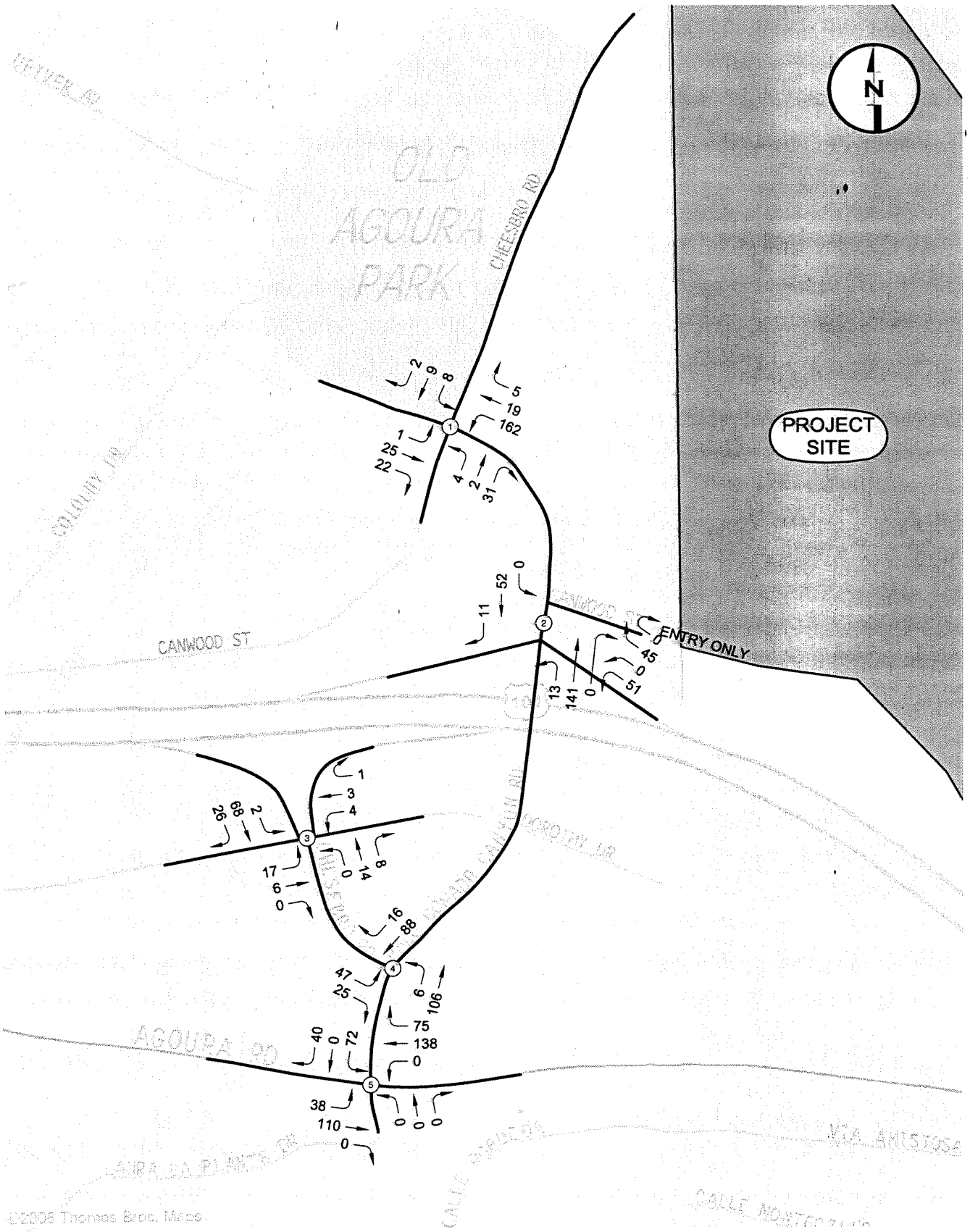

FIGURE 9(a)

HIRSCH GREEN
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FUTURE (2010) TRAFFIC VOLUMES
CUMULATIVE DEVELOPMENT
AM PEAK HOUR

2/12/2007

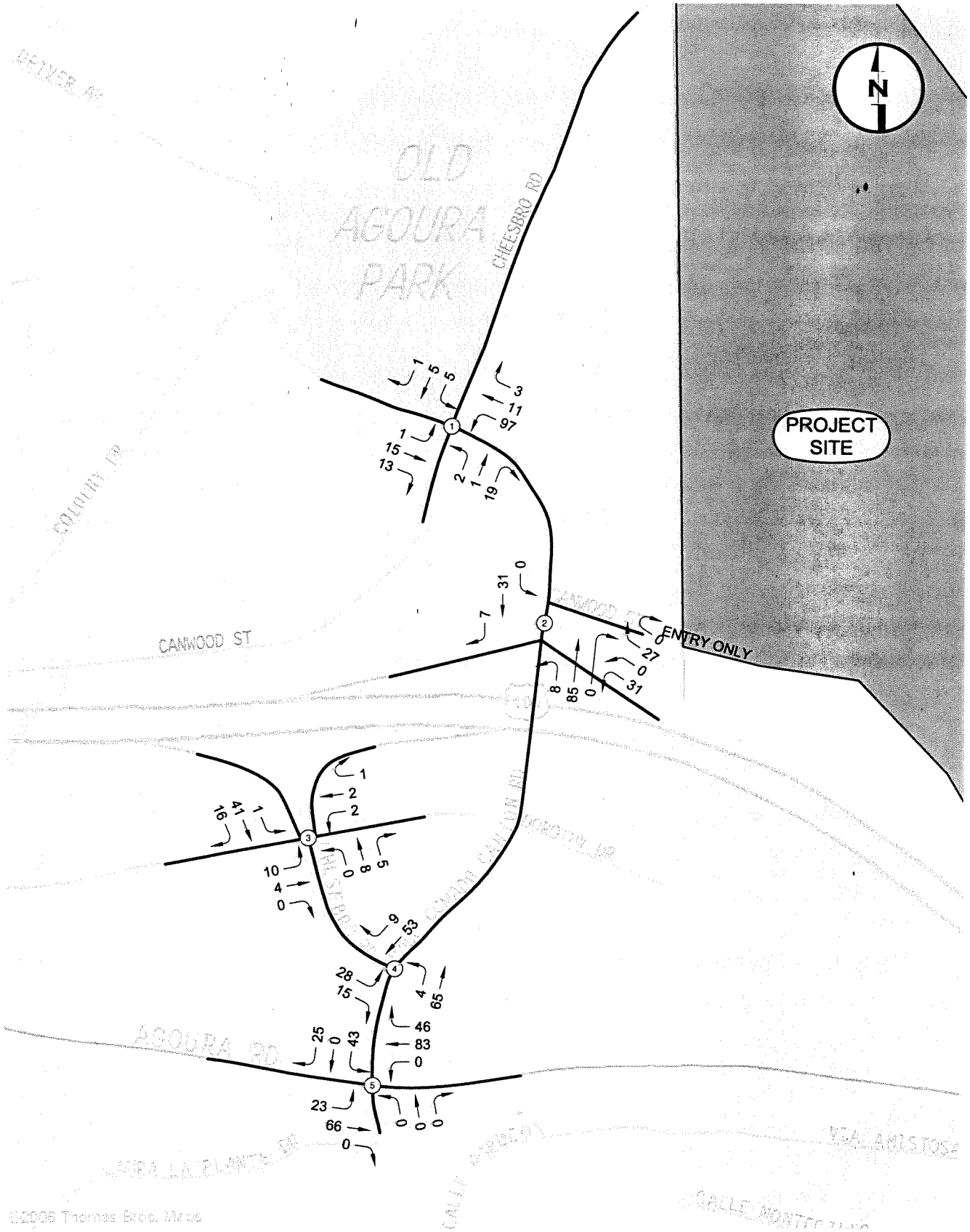

FIGURE 9(b)

HIRSCH GREEN

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FUTURE (2010) TRAFFIC VOLUMES
CUMULATIVE DEVELOPMENT
POST-AM PEAK HOUR

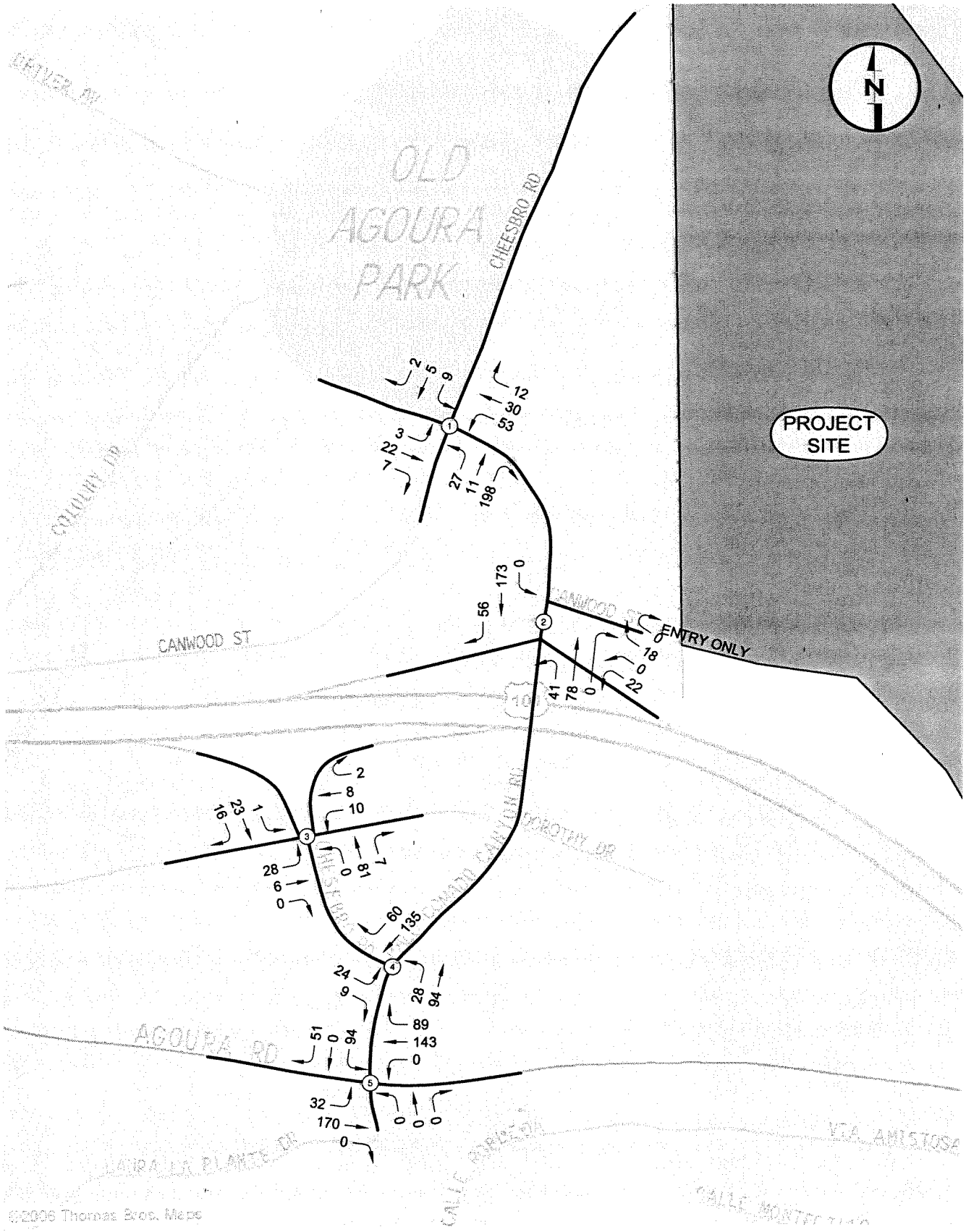

FIGURE 9(c)

2/12/2007

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

FUTURE (2010) TRAFFIC VOLUMES
CUMULATIVE DEVELOPMENT
PRE-PM SCHOOL, SCHOOL AND PRE-PM PEAK HOURS

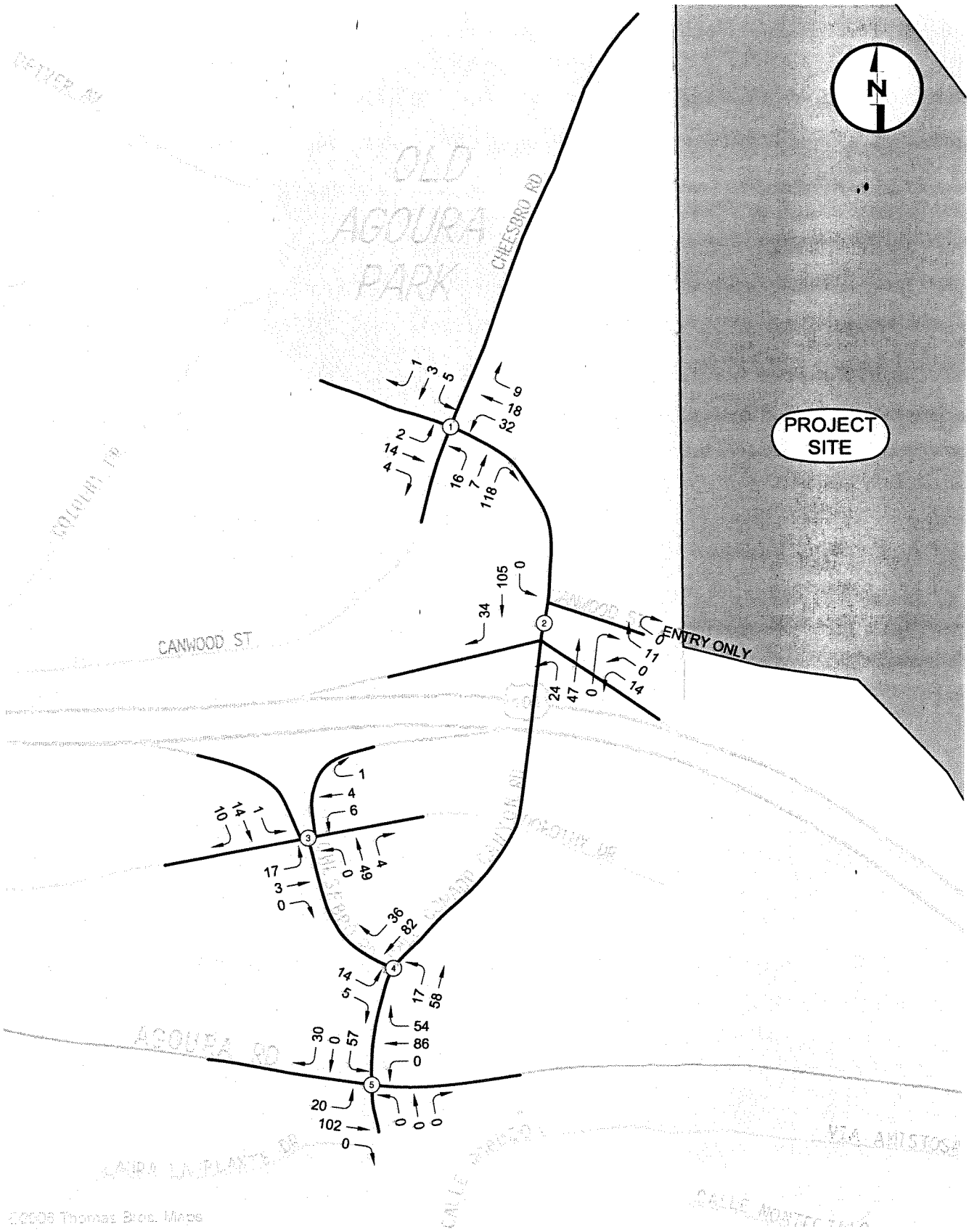

FIGURE 9(d)

FUTURE (2010) TRAFFIC VOLUMES
CUMULATIVE DEVELOPMENT
PM PEAK HOUR

HIRSCH GREEN
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2/12/2007

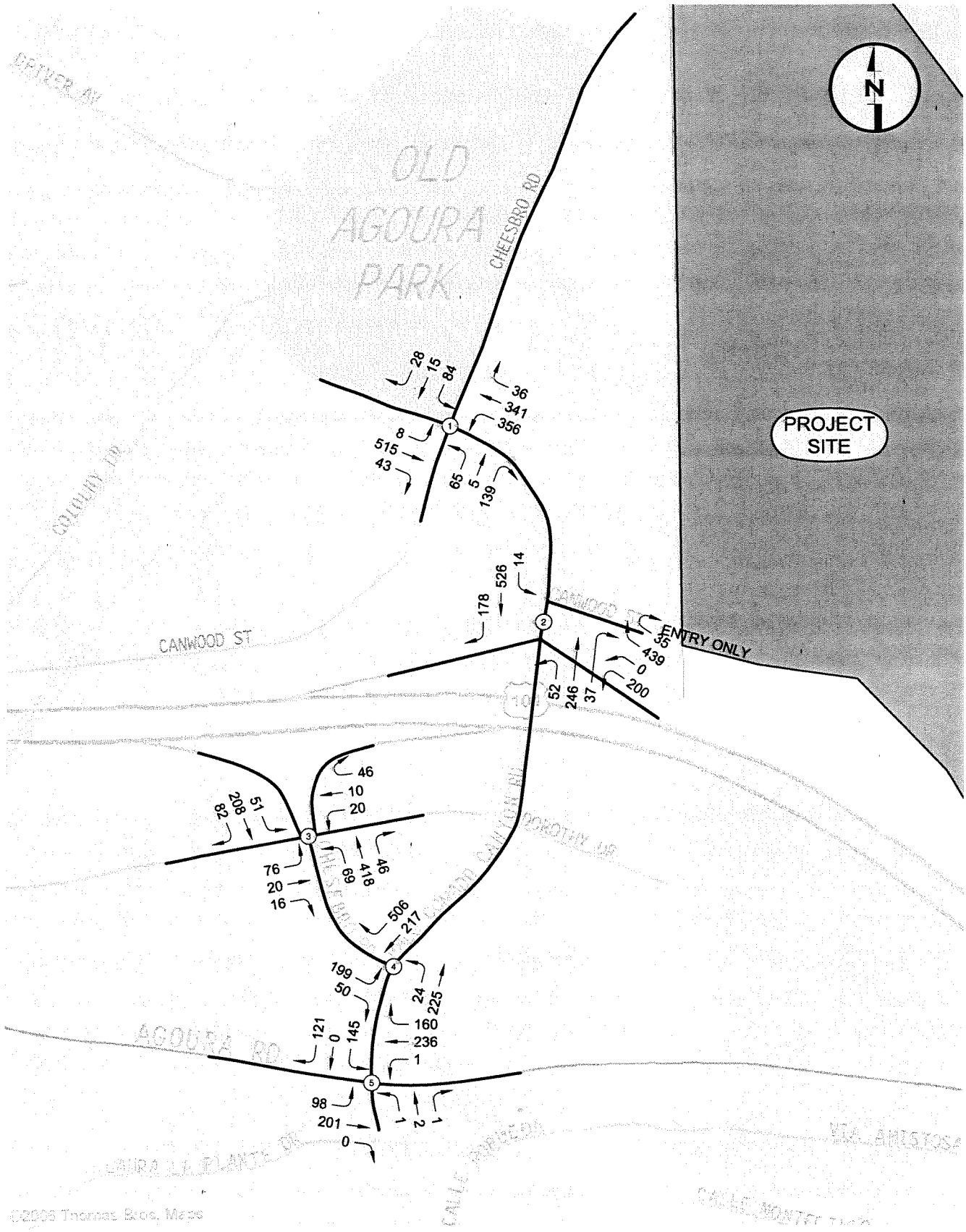

FIGURE 10(a)

HIRSCH GREEN

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FUTURE (2010) TRAFFIC VOLUMES
CUMULATIVE DEVELOPMENT PLUS PROPOSED PROJECT
AM PEAK HOUR

2/12/2007

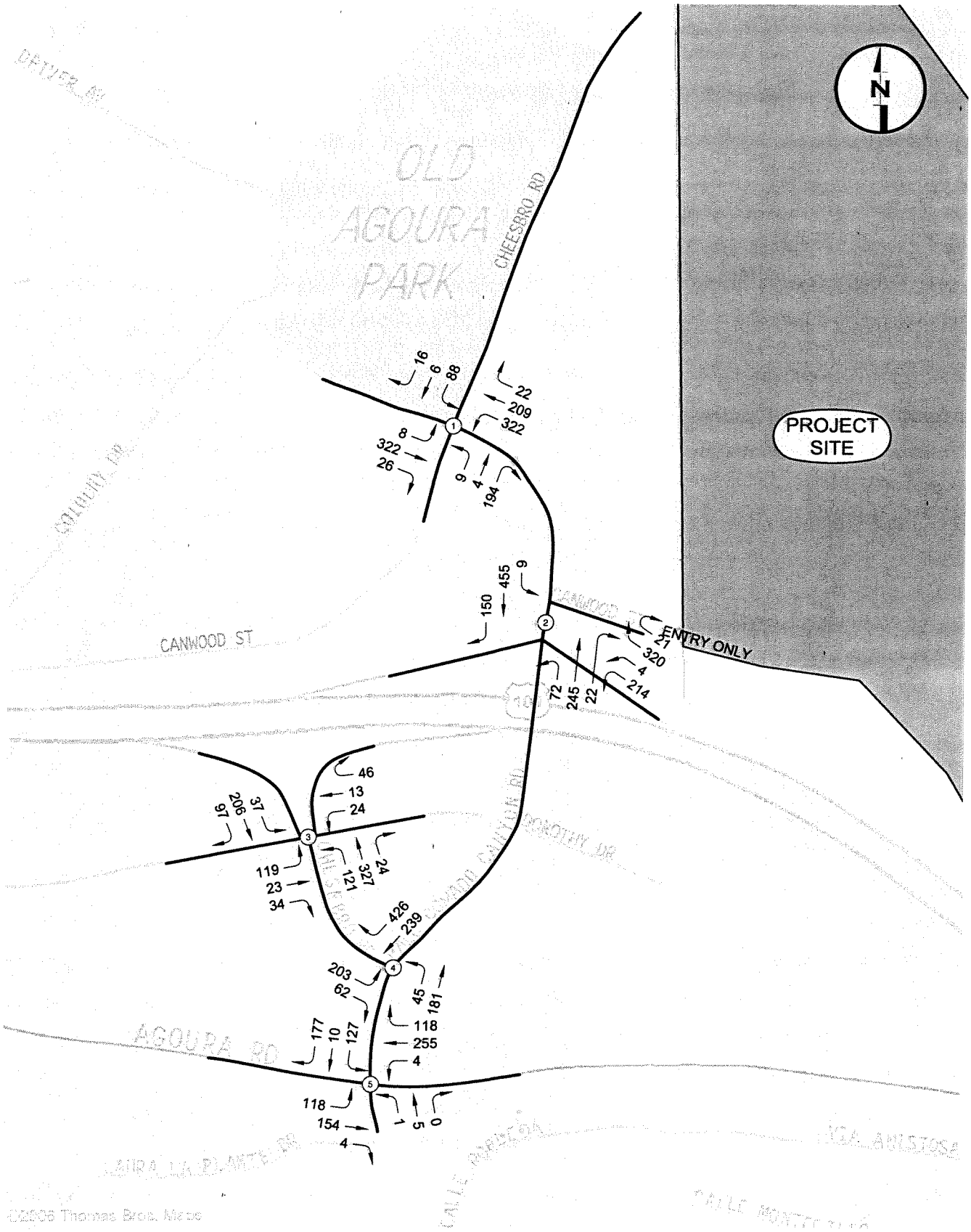

FIGURE 10(b)

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

FUTURE (2010) TRAFFIC VOLUMES
WITH PROJECT PLUS CUMULATIVE DEVELOPMENT
POST-AM PEAK HOUR

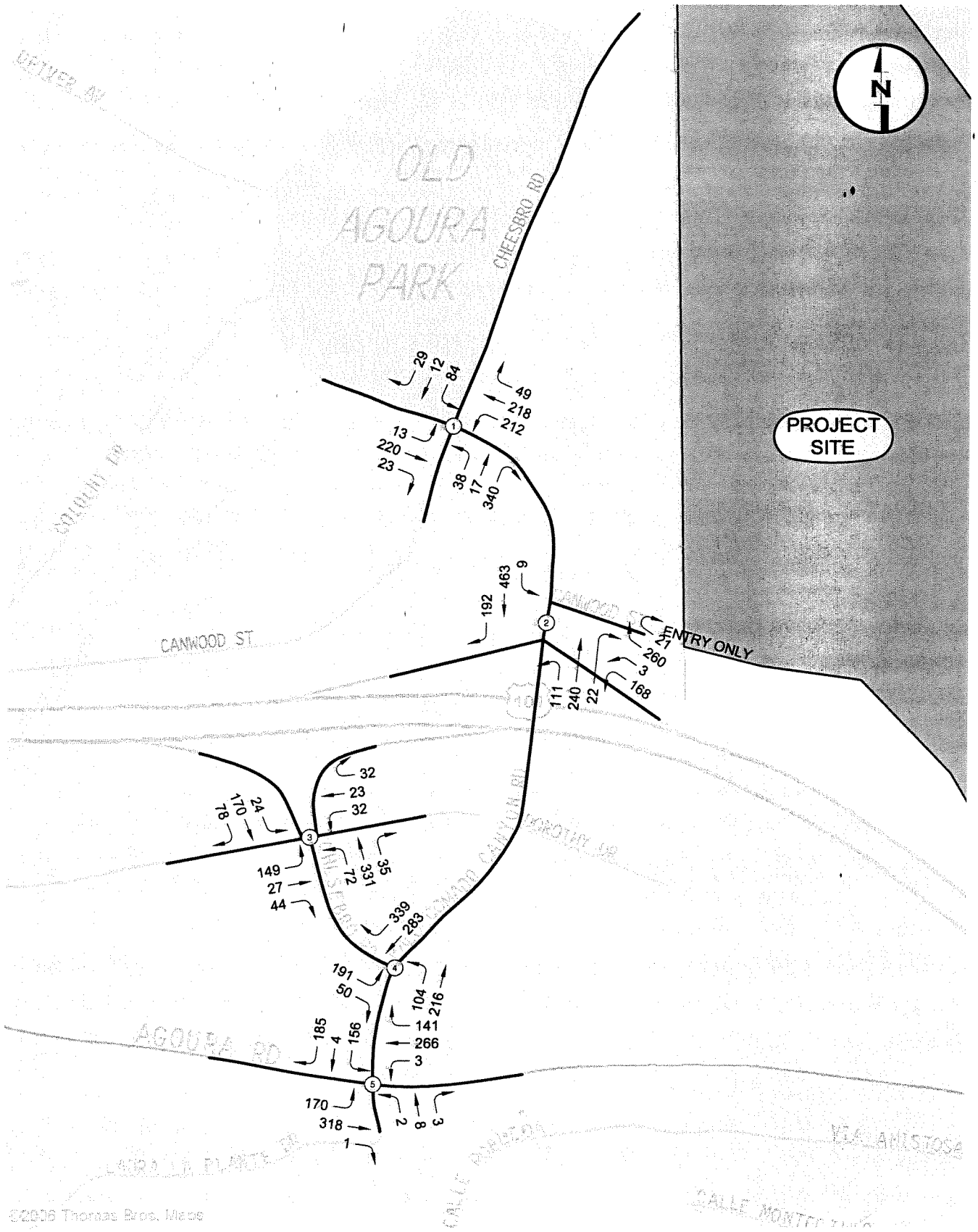

FIGURE 10(c)

3/1/2007

HIRSCH GREEN

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FUTURE (2010) TRAFFIC VOLUMES
WITH PROJECT PLUS CUMULATIVE DEVELOPMENT
PRE-PM SCHOOL PEAK HOUR

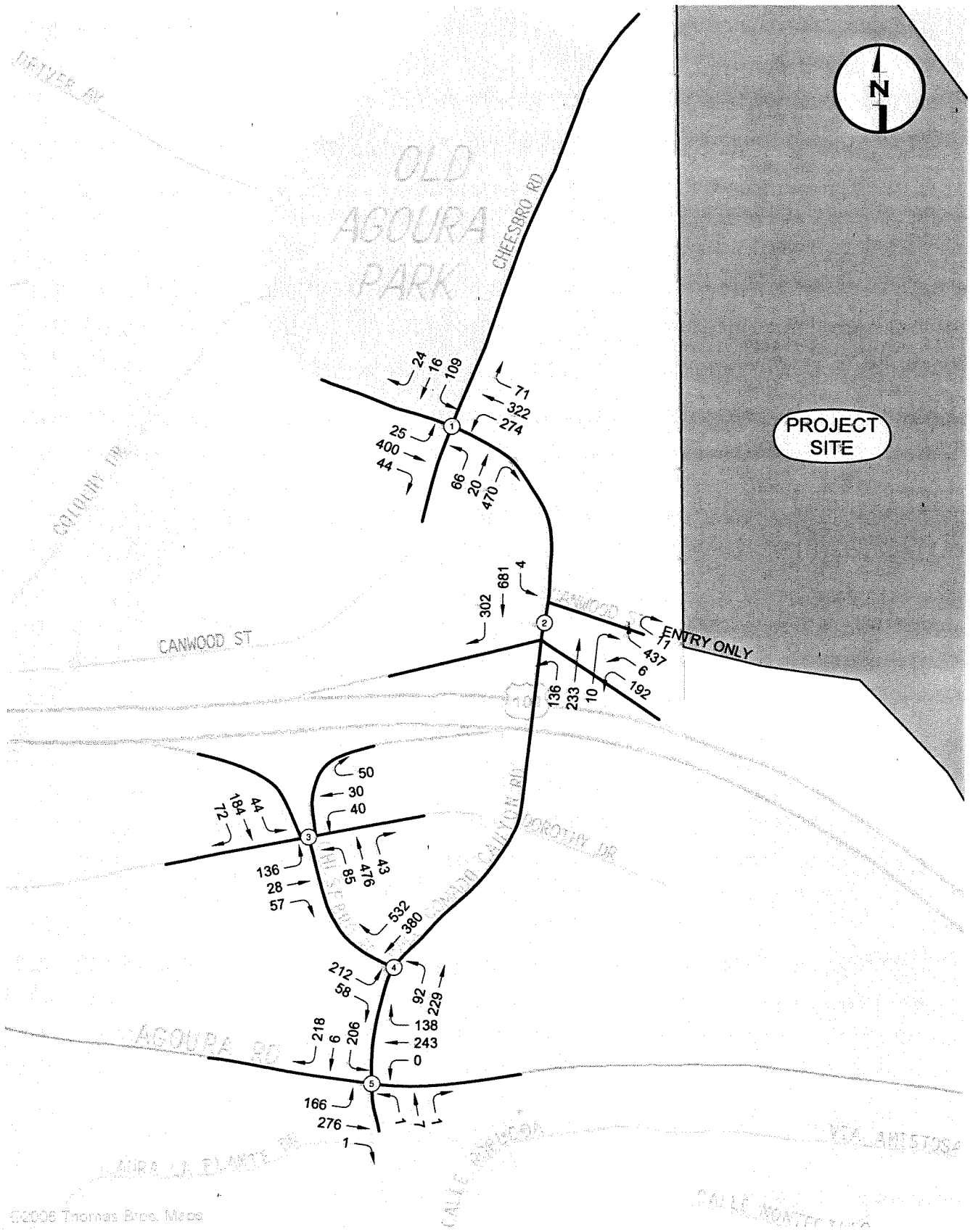

FIGURE 10(d)

2/12/2007

HIRSCH GREEN

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FUTURE (2010) TRAFFIC VOLUMES
CUMULATIVE DEVELOPMENT PLUS PROPOSED PROJECT
SCHOOL PM PEAK HOUR

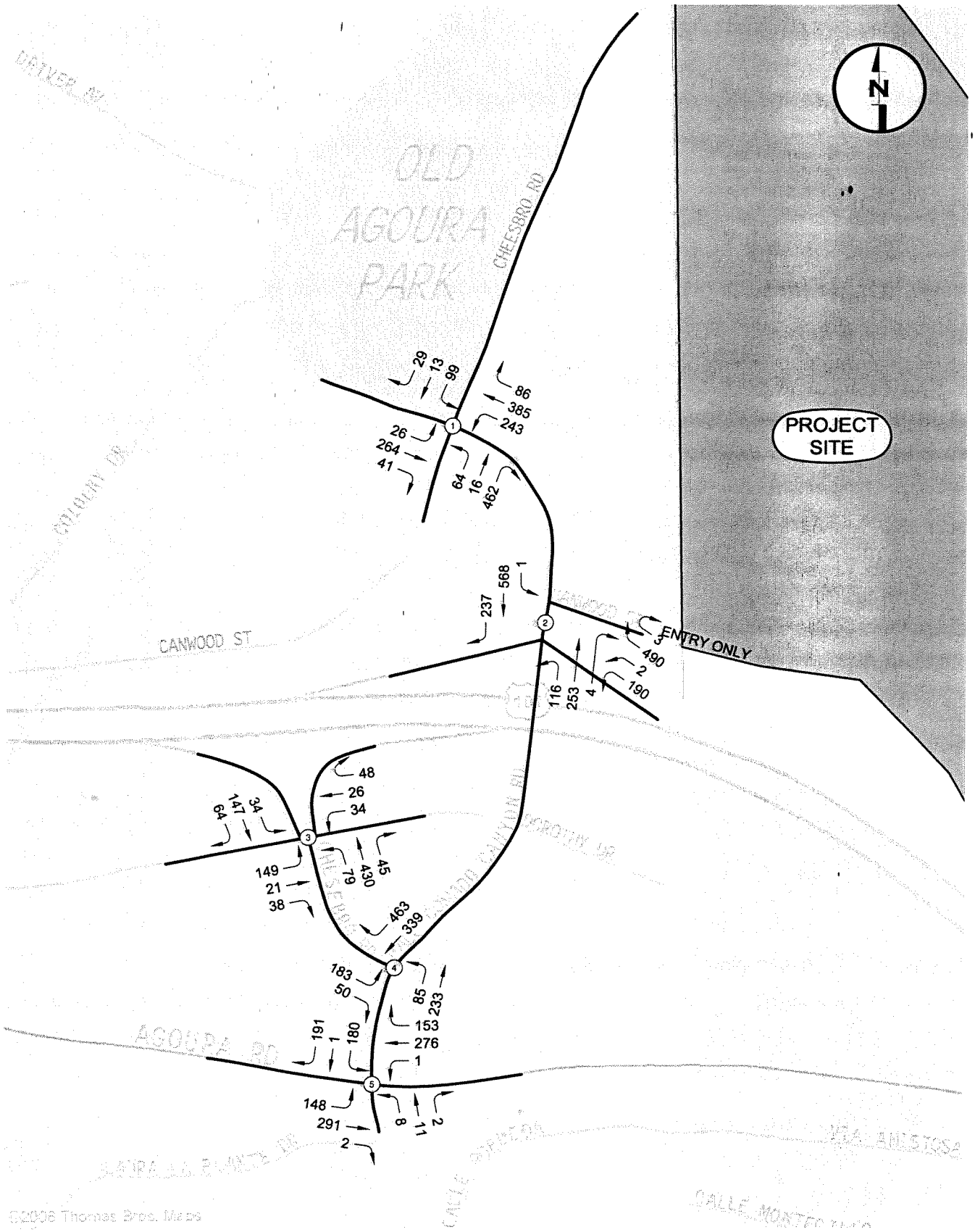

FIGURE 10(e)

2/12/2007

HIRSCH GREEN

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FUTURE (2010) TRAFFIC VOLUMES
WITH CUMULATIVE DEVELOPMENT
PRE-PM PEAK HOUR

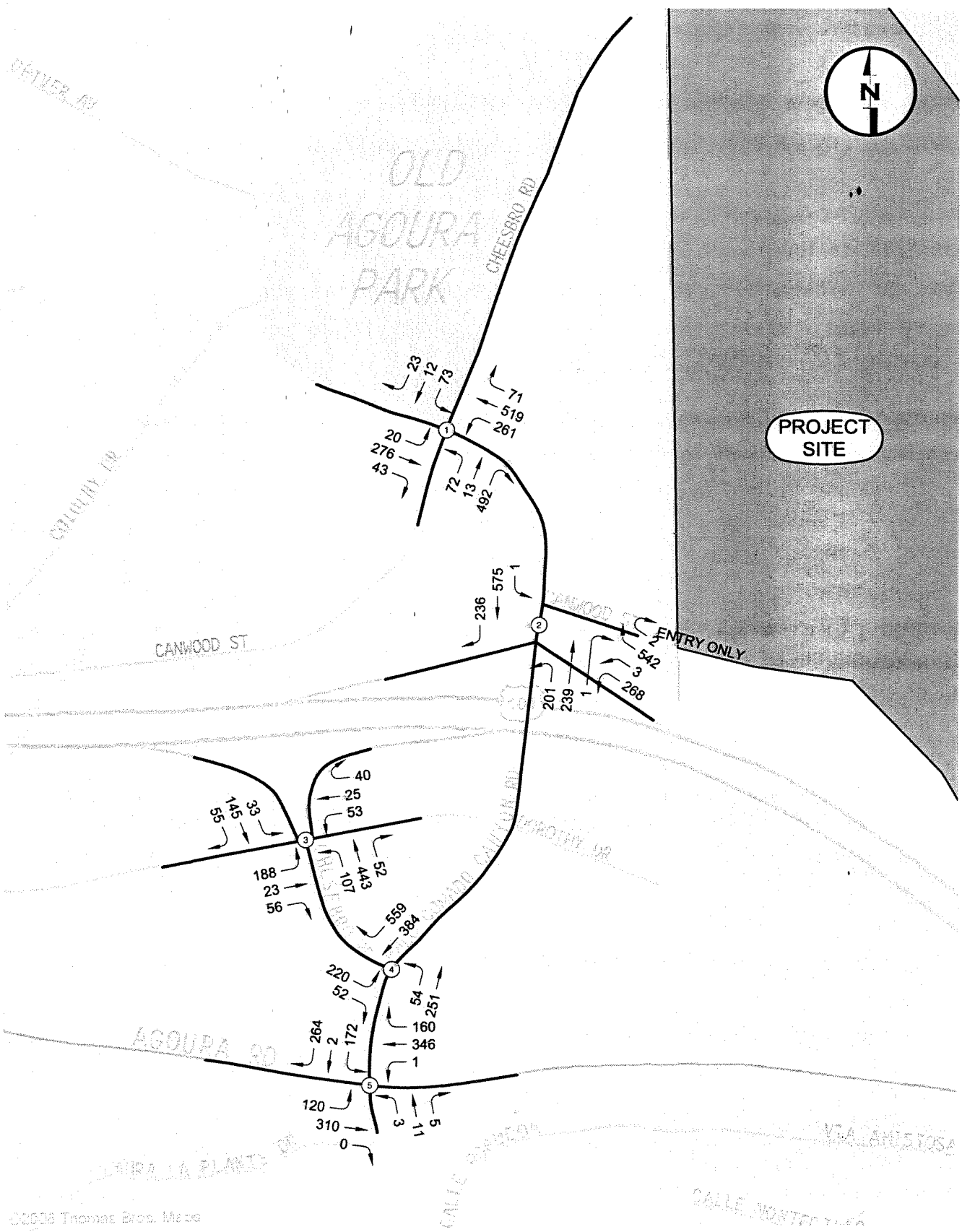

FIGURE 10(f)

FUTURE (2010) TRAFFIC VOLUMES
CUMULATIVE DEVELOPMENT PLUS PROPOSED PROJECT
PM PEAK HOUR

HIRSCH GREEN
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2/27/2007

Table 5
Critical Movement Analysis Summary
Future (2010) Without and With Cumulative Development
(Including Proposed Heschel School Interim Student Busing Program)

Int. No.	Intersection	Peak Period	Without Project		With Interim Student Busing Program			With Cumulative Development			Project % of Cumulative Impact
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact	
1	Canwood St./Chesebro Rd. at Driver Ave./Palo Comado Cyn. Rd.	AM	0.709	C	0.734	C	0.025	0.928	E	0.219 *	11.4%
		Post-AM	0.538	A	0.582	A	0.044	0.666	B	0.128	34.4%
		Pre-PM School	0.390	A	0.433	A	0.043	0.655	B	0.265	16.2%
		PM School	0.748	C	0.767	C	0.019	0.988	E	0.240 *	7.9%
		Pre-PM	0.602	B	0.623	B	0.021	0.844	D	0.242 *	8.7%
		PM	0.733	C	0.743	C	0.010	0.866	D	0.133 *	7.5%
2	Palo Comado Cyn. Rd. at US-101 Fwy. NB Ramps [1]	AM	0.758	C	0.797	C	0.039	0.888	D	0.130 *	30.0%
		Post-AM	0.631	B	0.679	B	0.048	0.734	C	0.103 *	46.6%
		Pre-PM School	0.481	A	0.529	A	0.048	0.723	C	0.242 *	19.8%
		PM School	0.850	D	0.869	D	0.019	1.063	F	0.213 *	8.9%
		Pre-PM	0.773	C	0.790	C	0.017	0.983	E	0.210 *	8.1%
		PM	0.978	E	0.987	E	0.009	1.103	F	0.125 *	7.2%
3	Chesebro Rd./Us-101 Fwy. SB Ramps at Dorothy Dr.	AM	0.559	A	0.573	A	0.014	0.613	B	0.054	25.9%
		Post-AM	0.551	A	0.568	A	0.017	0.593	A	0.042	40.5%
		Pre-PM School	0.467	A	0.484	A	0.017	0.595	A	0.128	13.3%
		PM School	0.633	B	0.647	B	0.014	0.758	C	0.125 *	11.2%
		Pre-PM	0.580	A	0.590	A	0.010	0.704	C	0.124 *	8.1%
		PM	0.724	C	0.729	C	0.005	0.796	C	0.072 *	6.9%

Table 5 (continued)
Critical Movement Analysis Summary
Future (2010) Without and With Cumulative Development
(Including Proposed Heschel School Interim Student Busing Program)

Int. No.	Intersection	Peak Period	Without Project		With Interim Student Busing Program			With Cumulative Development			Project % of Cumulative Impact
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact	
4	Chesebro Rd. & Palo Comado Cyn. Rd. at Chesebro Rd.	AM	0.473	A	0.498	A	0.025	0.546	A	0.073	34.2%
		Post-AM	0.450	A	0.474	A	0.024	0.503	A	0.053	45.3%
		Pre-PM School	0.359	A	0.383	A	0.024	0.523	A	0.164	14.6%
		PM School	0.529	A	0.546	A	0.017	0.633	B	0.104	16.3%
		Pre-PM	0.456	A	0.467	A	0.011	0.554	A	0.098	11.2%
		PM	0.566	A	0.573	A	0.007	0.624	B	0.058	12.1%
5	Chesebro Rd. & Laura La Plante Dr. at Agoura Rd.	AM	0.353	A	0.333	A	-0.020	0.635	B	0.282	n/a
		Post-AM	0.480	A	0.492	A	0.012	0.675	B	0.195	6.2%
		Pre-PM School	0.420	A	0.432	A	0.012	0.773	C	0.353 *	3.4%
		PM School	0.491	A	0.474	A	-0.017	0.815	D	0.324 *	n/a
		Pre-PM	0.453	A	0.458	A	0.005	0.798	C	0.345 *	1.4%
		PM	0.684	B	0.684	B	0.000	0.890	D	0.206 *	0.0%

Notes:

[1] Includes Canwood St. approach.

"*" Indicates significant impact per Los Angeles County Department of Public Works "Traffic Impact Analysis Report Guidelines" criteria, January 1, 1997.

"n/a" Project results in "negative impact" (e.g., reduction in CMA value), therefore, it does not contribute to cumulative impacts.

As indicated in Table 5, the potential cumulative development in the study area is expected to result in substantial deterioration in the operations of a number of the study intersections, with at least two of the locations exhibiting LOS E (Canwood Street/Chesebro Road at Driver Avenue/Palo Comado Canyon Road, during the AM and PM School peak hours) or LOS F (Palo Comado Canyon Road at US-101Freeway Westbound On/Off-Ramps, during the PM School peak and PM peak hours) conditions. Table 5 also shows that the anticipated traffic increases from ongoing development in the study area would result in significant cumulative traffic impacts at four of the five study intersections during multiple periods throughout the day.

Measures to address the cumulative traffic impacts resulting from the additional related project trips are described in detail in the approved Crain & Associates traffic study, and in the Heschel School EIR. These cumulative improvements include a variety of options, including both signalized and unsignalized intersection improvement alternatives, for addressing the potential cumulative impacts. All of the proposed improvements are consistent with or compatible with long-range roadway system improvements identified by the City of Agoura Hills in their City's Master Plan transportation element.

As described earlier, the proposed Heschel School project will contribute incrementally to these cumulative traffic impacts. While the project-specific impacts of the proposed Heschel School Interim Student Carpool/Busing Program itself will be less than significant, and will not warrant or require any roadway improvements, the project will be responsible for "fair share" contributions toward the cumulative mitigation improvements, as discussed in detail in the approved project traffic study and project EIR. However, the Proposed Interim Student Carpool/Busing Program and Board of Supervisors' intended temporary limitation on the number of students to 390 results in a substantial decrease in the amount of project-related traffic within the cumulative conditions.

Table 5 also includes the previously-identified project-specific impacts at the study intersections, as well as a calculation of the project's incremental contributions to the total cumulative impacts. These incremental contributions are substantially reduced from those identified in the approved project analyses for the 750-student facility. Therefore, should any of the cumulative traffic mitigation improvements be constructed during the operations of the interim, 390-student occupancy of the Heschel School, or prior to implementation of the final intersection and roadway improvements required by the County related to the approved 750-student enrollment level, the "fair share" percentages shown in Table 5 should be used as the basis for School-related contributions to the costs of these long-term roadway improvements.

Special Events

During the school months of September through June, evening or weekend daytime events may occur on a weekly basis. A summary of events anticipated to occur at the School are shown in Table G-1 in the original project traffic study. As indicated in this table, most of the anticipated special events would typically generate attendance levels of no more than 60 to 70 people at any time. Events involving weekday activities would not generally overlap normal School operations, so that additional traffic and occupancy loads on the campus and surrounding area will not occur. Additionally, many of these "typical" events will occur on weekends, when commuter traffic congestion in the area is substantially reduced from the peak period levels examined in this report. As no detailed analysis of these school-related late afternoon/evening activities was deemed warranted for the approved 750-student project, no additional analyses were prepared as part of this supplemental analysis.

In addition to the school year special events described above, the campus may also be used during the summer months for special programs such as a day camp or summer school. However, the enrollment for these special programs will not exceed the allowable student population for the School (either during the interim period analyzed in this study, or ultimately at full enrollment), and as such, the potential trip generation and subsequent traffic impacts from these activities are not anticipated to exceed those identified for normal School operations. Such summer activities at the site are assumed to be included in the "allowable" trip generation limits identified previously for the interim School, and would be subject to carpool/busing programs if the expected attendance exceeds the trip allowances identified earlier in Table 1. Therefore, these events would not be expected to produce significant impacts, and as a result, no specific analysis of these summer programs was considered necessary.

Some events, however, such as graduation ceremonies or Chanukkah celebrations, could attract a rather large attendance. While these larger events would not coincide with typical weekday School schedules, and will occur on weekends when background traffic volumes are generally lower than the weekday commute periods described earlier, due to the higher attendance levels anticipated these events, it is possible that these events could result in traffic impacts on the surrounding streets. Therefore, a supplemental "Weekend Special Event" analysis was performed to assess the potential effects of large attendance weekend events at the School. It is important to note that, while the "Weekend Special Event" scenario was fully analyzed in the original project traffic study, those analyses assumed a maximum attendance at

such events of up to approximately 1,500 persons. The proposed interim School will operate on a much more limited enrollment and event attendance scale, and as such, the number of attendees at such weekend special events is expected to be substantially reduced from those levels identified in the approved Crain & Associates traffic study. A detailed discussion of the anticipated attendance levels and potential impacts of special events during the interim Heschel School occupancy period is contained in the following pages.

Without Special Event Conditions

The supplemental weekend "Special Events" analysis is based once again on the data and information contained in the approved project traffic study; as detailed in that analysis, traffic data were collected at each of the five the study intersections between the hours of 10:00 AM and 4:00 PM on both a Saturday and a Sunday, to identify the peak weekend traffic periods. The results of those counts indicated that the peak hours of traffic activity generally occurred between about 11:45 AM to 1:45 PM on Saturday, and from about 11:30 AM to 1:15 PM on Sunday. The peak hour of traffic at each of the intersections was determined separately within these time periods, so that the "worst case" conditions at each location could be analyzed. The "existing" Saturday and Sunday peak hour traffic volumes are contained in the original project traffic study, and can be reviewed in that document, along with the analyses of the existing operating conditions for each intersection. However, since the potential interim Heschel School special events impacts are based on future (2010) forecast conditions, these volumes are not included specifically in this analysis, but are incorporated by reference from the approved study.

The interim School weekend Special Event traffic impact analyses were conducted using the same assumptions and methodologies as described in the discussion of weekday peak period impacts. The future year (2010) traffic volumes were estimated using the same 2.0 percent annual ambient traffic growth rate applied to all traffic movements at each of the study intersections. These forecast future "Without Heschel School Special Events" traffic volumes, again excerpted directly from the original project traffic analyses in order to provide a standard basis for comparison of impacts from the approved project and the interim School operations, are shown in Figure 11(a) and Figure 11(b) for Saturday and Sunday conditions, respectively.

The operations of the study intersections for the "Future (2010) Without Special Event" traffic conditions were evaluated using the same Critical Movement Analysis (CMA) procedures described earlier in the report, and the resulting levels of service at each of the five study intersections are summarized in Table 6.

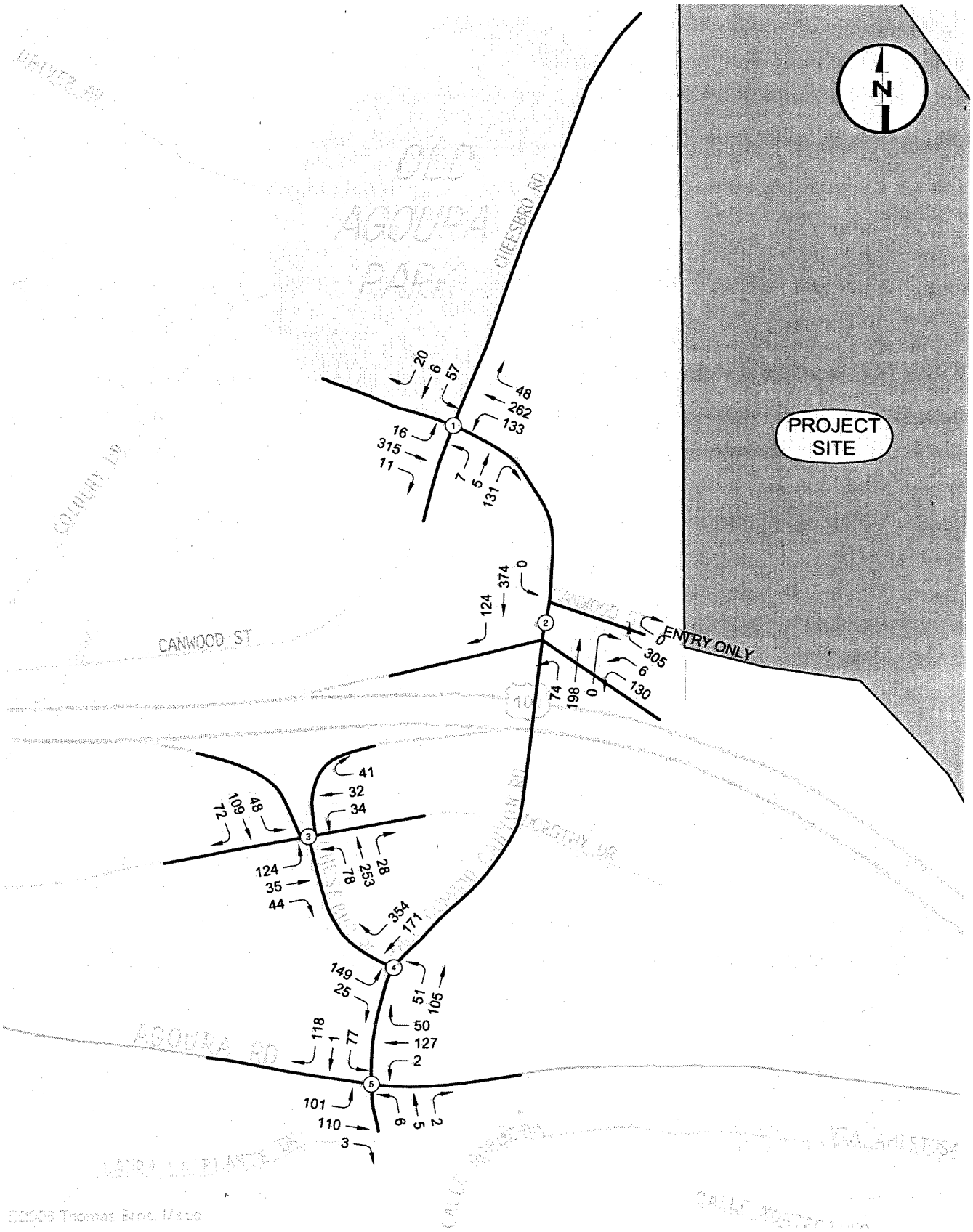

FIGURE 11(a)

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT SPECIAL EVENT
SATURDAY PEAK HOUR

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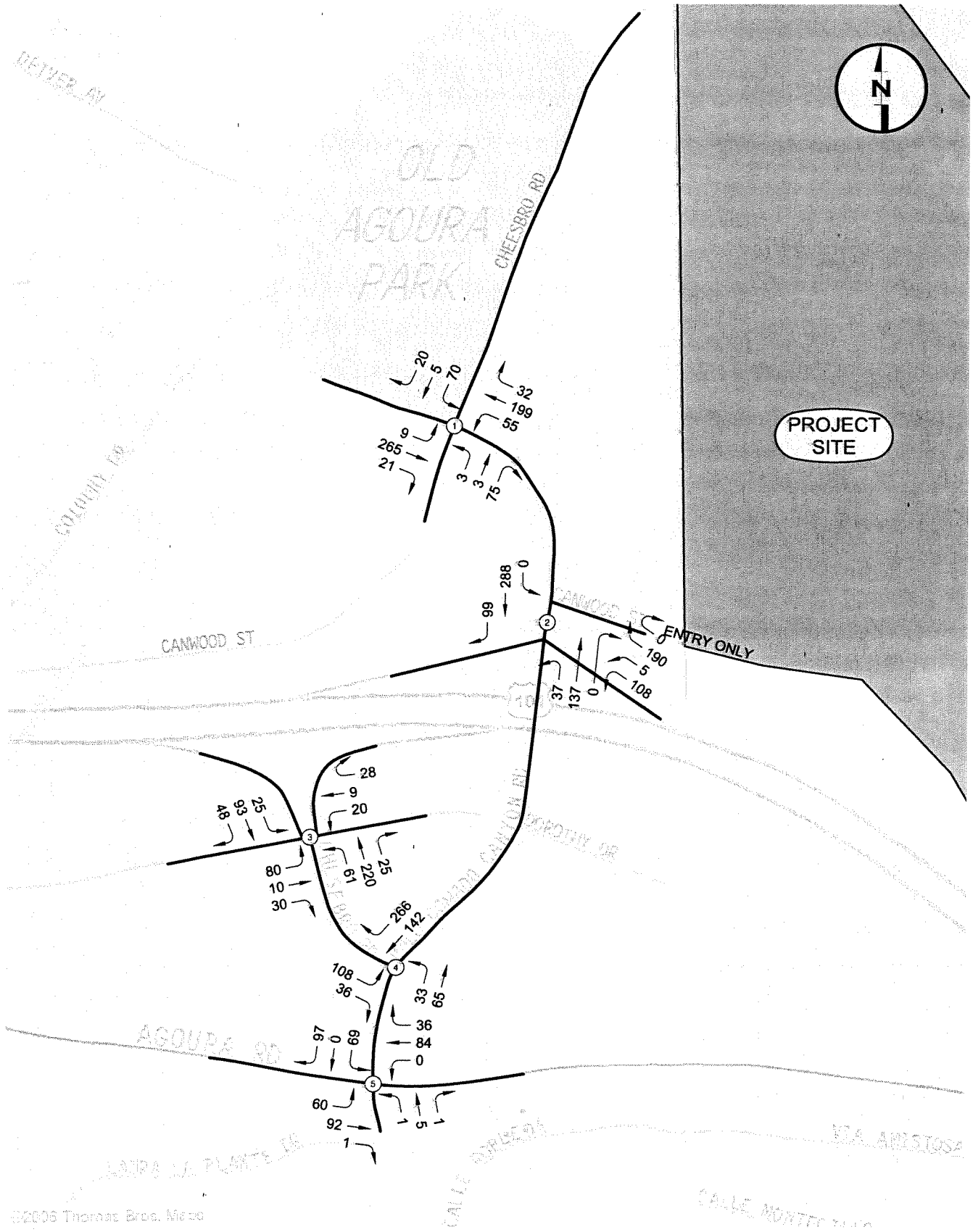

FIGURE 11(b)

2/27/2007

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FUTURE (2010) TRAFFIC VOLUMES
WITHOUT SPECIAL EVENT
SUNDAY PEAK HOUR

Table 6
Critical Movement Analysis Summary
Future (2010) Without Special Event Weekend Conditions

Int No.	Intersection	Day	Without Special Event CMA	Without Special Event LOS
1	Canwood St./Chesebro Rd. at Driver Ave./Palo Comado Cyn. Rd.	Saturday	0.498	A
		Sunday	0.389	A
2	Palo Comado Cyn. Rd. at US-101 Fwy. NB Ramps	Saturday	0.633	B
		Sunday	0.433	A
3	Chesebro Rd./US-101 Fwy. SB Ramps at Dorothy Dr.	Saturday	0.537	A
		Sunday	0.393	A
4	Chesebro Rd. & Palo Comado Cyn. Rd. at Chesebro Rd.	Saturday	0.410	A
		Sunday	0.309	A
5	Chesebro Rd. & Laura La Plante Dr. at Agoura Rd.	Saturday	0.402	A
		Sunday	0.289	A

The forecast future weekend traffic conditions summarized in Table 6 indicate that considerable excess capacity exists and will continue to exist at all of the study intersections during weekend periods. It is important to note, also, that the conditions shown in Table 6 reflect the highest traffic volume periods for the weekend counts at the study locations. Traffic volumes during other times of the weekend are anticipated to be lower than those analyzed in this supplemental analysis. Additionally, a comparison of the forecast future weekend conditions in Table 6 to the weekday "Without Project" conditions summarized earlier in Table 3 and Table 5 of this traffic study indicates that the peak operational levels at all of the study locations are substantially better on weekends than during typical peak weekday conditions. Table 3 and Table 5 show that weekday forecast future (2010) "Without Project" conditions are expected to range from LOS A to LOS E, with intersections nearest the proposed School project operating at LOS C to LOS E conditions. As shown in Table 6, however, all of the study intersections are forecast to operate at LOS A during both the Saturday and Sunday peak periods, with the exception of the intersection of Palo Camodo Canyon Road at the US-101Northbound Ramps, which is projected to exhibit midrange LOS B conditions during the Saturday peak hour.

Special Event Traffic Volumes

Heschel School "Special Event" traffic volumes were calculated based on anticipated maximum attendances for weekend events, balanced against the directive of the Board of Supervisors that

the School operate without producing significant impacts to the area intersections and roadways. This directive was also assumed to include Special Events anticipated at the School. Therefore, based on the forecast "Without Special Event" traffic volumes and operating conditions shown earlier in Figures 11(a) and 11(b), and summarized in Table 6, the maximum allowable number of vehicle trips that any of the study intersections can accommodate without significant impacts was identified. This process involved an iterative process similar to that described previously in this report regarding trip estimation for the typical weekday operations.

Based on this maximum number of vehicles allowed at the study intersections, the approximate number of attendees was estimated using average vehicle occupancy (AVO) assumptions identified in the original traffic study. As described in that report, most of the weekend Special Events are family-oriented assembly special events, including School graduation and/or celebrations of Jewish holidays, and typically involve higher vehicle occupancy rates than the approximately 1.2 persons per vehicle average vehicle occupancies observed for the Southern California area, as surveyed by the Southern California Association of Governments (SCAG). Most of the attendees will be families or individuals who will share rides with multiple other persons, and vehicle occupancies of three or more persons per vehicle are not uncommon. However, when evaluating the potential traffic effects of such events, <u>average</u> vehicle occupancies, including not only multiple occupancy vehicles but also single-occupant vehicles, above 2.50 become difficult to maintain. Therefore, a conservative estimate of 2.50 persons per vehicle was used in the original estimation of traffic generation for these weekend special events. This assumption was also used to calculate the approximate attendance allowed for the interim School Special Events based on the maximum number of allowable vehicles.

The original project analyses also provided assumptions regarding the trip patterns for the arriving and departing traffic for the Special Events. As discussed in that study, while these large weekend special events are generally scheduled to occur over the course of several hours, it is likely that most, but not all, of the anticipated attendees would arrive (or depart) during a single hour. Therefore, it was assumed that approximately 80 percent of the anticipated attendees would access the project site (arrive or depart) during the peak hour of activity. Further, the peak hour Special Event traffic activity was assumed to exhibit an approximately 90/10 directional "split", with 90 percent of the peak period event traffic occurring in the peak direction (either arriving or leaving the site). Based on these assumptions and iterative allowable trip identification, the approximate attendance and resulting trip generation for the weekend special events at the interim School were calculated, and are shown in Table 7.

Table 7
Maximum Weekend Special Event Traffic Volumes

Description	Daily Trips	Pre-Event Arrival Scenario In	Pre-Event Arrival Scenario Out	Post-Event Departure Scenario In	Post-Event Departure Scenario Out
445 Attendee Event	356	128	14	14	128
		\	/	\	/
		142		142	

As shown in Table 7, it is estimated that a Special Event could occur at the interim School with a maximum attendance of approximately 445 persons and an AVO of approximately 2.5 persons per vehicle. This represents a "worst case" assumption, in that the 2.5 AVO assumption is the controlling factor limiting the number of attendees. Similar to the conditions described for the weekday carpool/busing program, the analyses are intended to identify the maximum number of pce vehicle trips that could occur without creating significant impacts. If a more aggressive carpool and/or shuttle or busing plan is implemented with these Special Events, the number of attendees would be greater (for example, if a shuttle program results in an AVO of 3.0 persons per vehicle, the number of attendees could increase to approximately 530 persons).

In order to be compatible with the analyses contained in the approved project traffic study, two Special Event traffic scenarios were examined in this supplemental analysis. Although the amount of traffic entering for the events will be identical to the amount leaving, the highly skewed directionality of the event traffic could result in different impacts to the nearby intersections for "pre-event entering" conditions as compared to "post-event exiting" conditions. Therefore, each of these potential conditions was examined separately; Table 7 includes the trip generation estimates for both the "pre-event" and "post-event" conditions.

Finally, using the same "one-way loop" access scenario trip distribution percentages described earlier in this study for the weekday peak hour interim School traffic (since the attendees to the Special Events would involve the same families as the prospective School students), the traffic volumes generated by the anticipated Special Events were assigned to the area roadway network. The peak Special Event traffic volumes are shown in Figure 12(a) for the "pre-event arrival" conditions and in Figure 12(b) for the "post-event departure" conditions. It was assumed that the Special Event traffic would be the same for either Saturday or Sunday events.

HESCHEL SCHOOL - ALT ACCESS ANALYSIS \ EVENT-WEEKEND-ARIVL

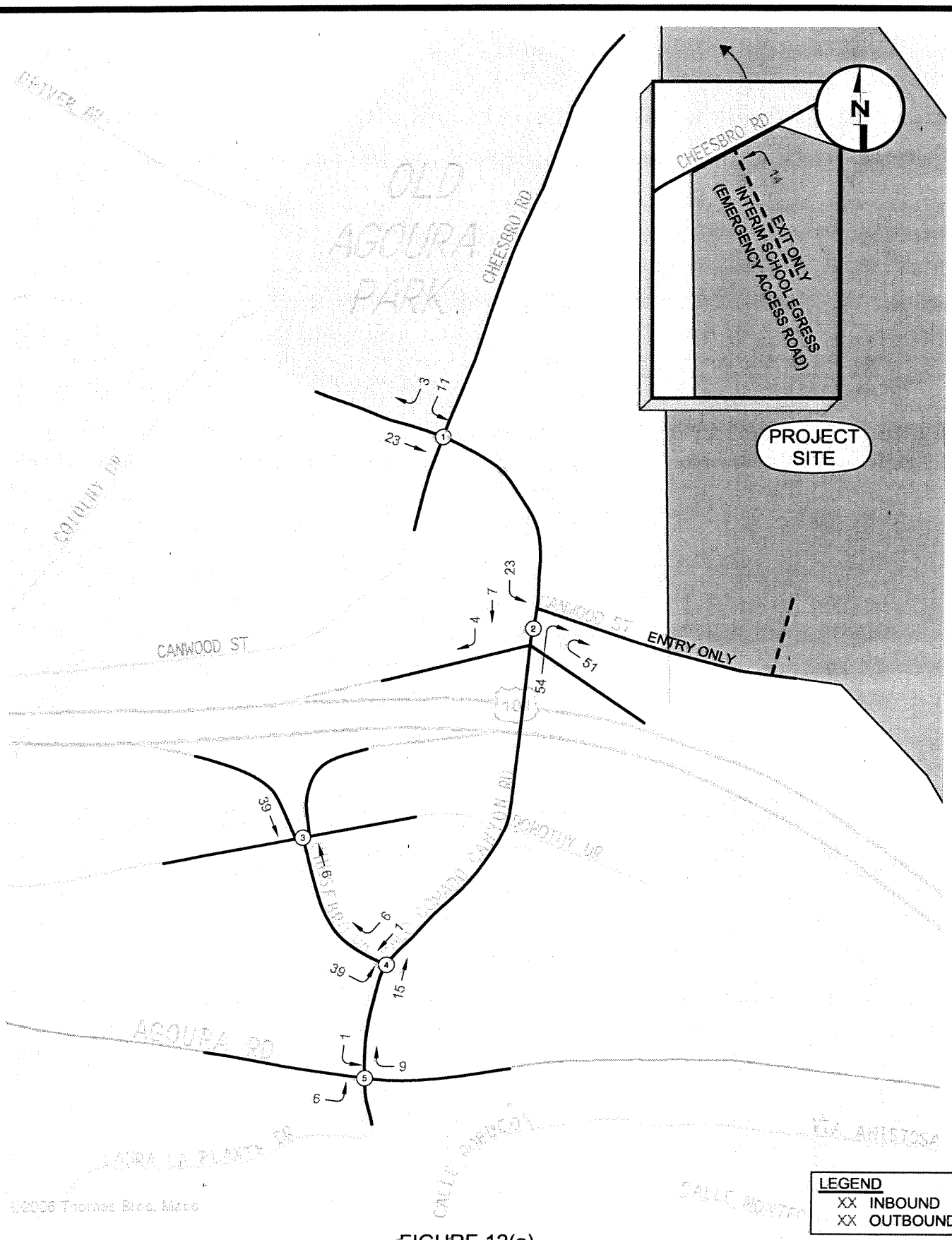

FIGURE 12(a)

2/27/2007

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INTERIM HESCHEL SCHOOL OPERATIONS
WEEKEND SPECIAL EVENT TRIPS
ARRIVAL SCENARIO

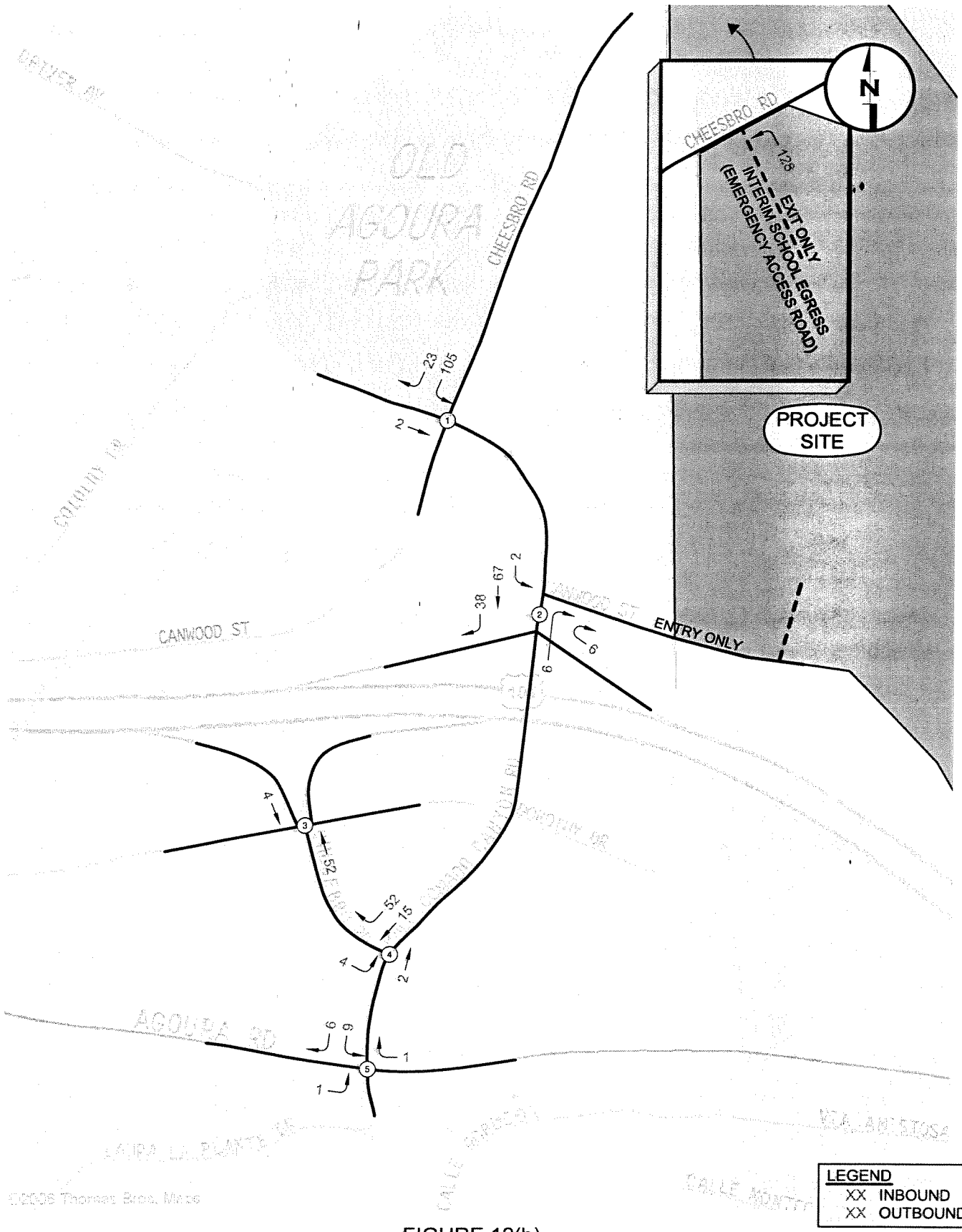

FIGURE 12(b)

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

INTERIM HESCHEL SCHOOL OPERATIONS
WEEKEND SPECIAL EVENT TRIPS
DEPARTURE SCENARIO

Analysis of Special Event Traffic Impacts

In order to assess the maximum potential traffic impacts generated by the highest attended Special Events, it was assumed that the peak event traffic (either entering or exiting scenarios) would occur during the peak traffic periods of the adjacent street traffic for both Saturday and Sunday. Therefore, the Special Event traffic volumes shown in Figures 12(a) and 12(b) were overlaid on the forecast "Future (2010) Without Special Event" traffic volumes shown earlier in Figures 11(a) and 11(b), to produce the "With Special Event Traffic" conditions. The resulting "Pre-Event Arrival Scenario" traffic volumes are shown in Figure 13(a) for Saturday conditions and in Figure 13(b) for Sunday conditions. The alternate "Post-Event Departure Scenario" traffic volumes are shown in Figures 14(a) and 14(b) for Saturday and Sunday conditions, respectively. These traffic conditions were also evaluated using the same CMA methodologies and assumptions described previously, and the potential incremental impacts of a maximum-attendance weekend Special Event for the interim School were identified. The results of these analyses are summarized in Table 8.

The results of the weekend Special Event analysis verify the previously-described assumption that a maximum-attendance event, drawing a total of approximately 445 persons, would not create any significant impacts at any of the five study intersections, regardless of whether they occur on Saturday or Sunday. Therefore, based on these analyses, since no significant impacts are anticipated due to Special Events, no mitigation is warranted. However, although no significant impacts are expected, the number of vehicles generated by these Special Events could briefly result in increased delays at the study intersections nearest the project site, as most of the attendees are anticipated to arrive or depart during similar times. Therefore, while not part of any required traffic "mitigation" measures, it is recommended that, during events of the magnitudes described above, the School provide traffic control officers to be stationed at the School access location of Palo Comado Canyon Road and the westbound US-101 ramps/Canwood Street, at the School exit location on Chesebro Road, and at the intersection of Driver Avenue/Palo Comado Canyon Road at Canwood Street/Chesebro Road. These officers will ensure that traffic flows smoothly during both the arrival and departure periods for these high-attendance Special Events, and that no excessive traffic delays or impacts occur.

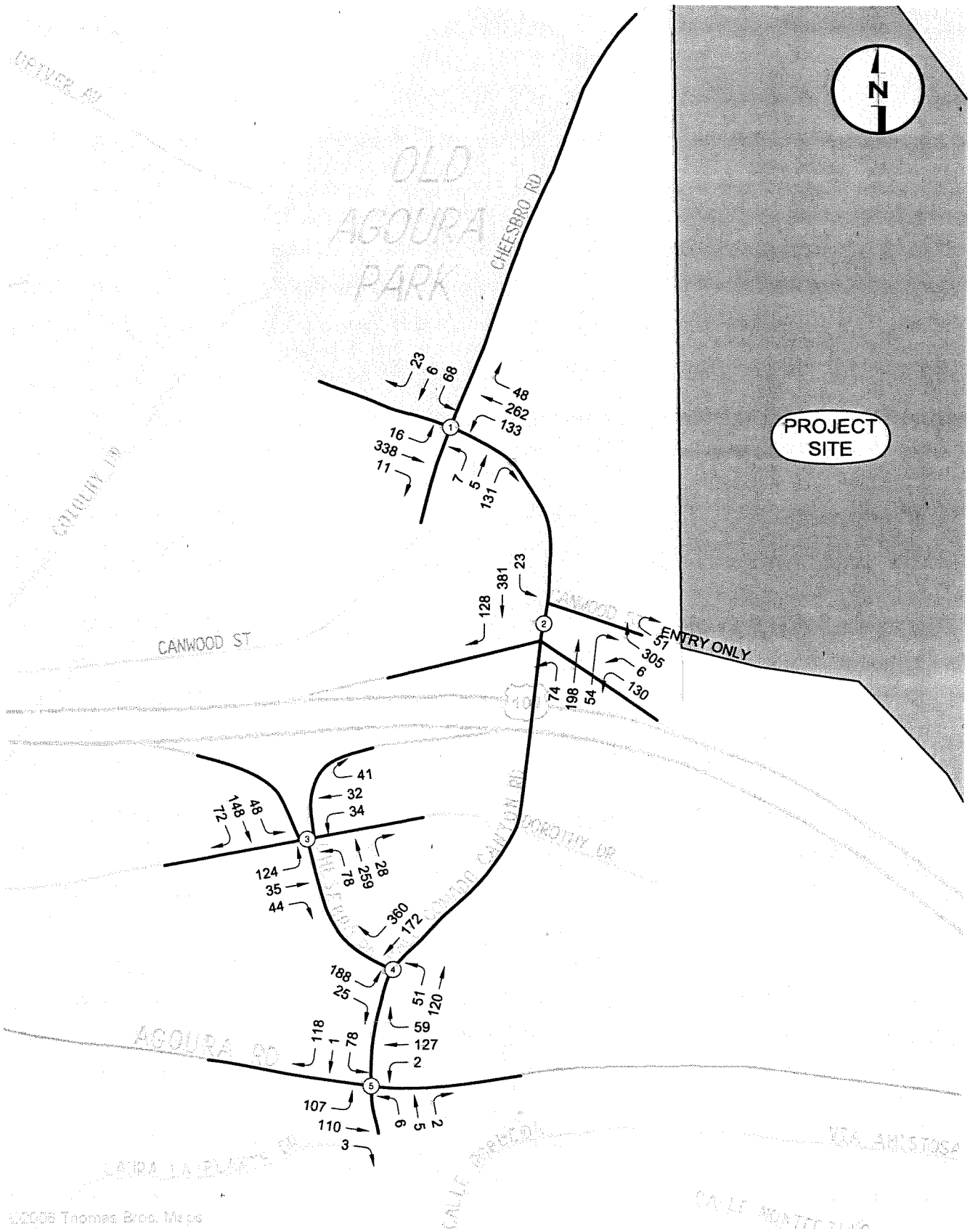

FIGURE 13(a)

2/27/2007

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Hirsch/Green Transportation Consulting, Inc.

FUTURE (2010) TRAFFIC VOLUMES
WITH SPECIAL EVENT
SATURDAY ARRIVAL SCENARIO

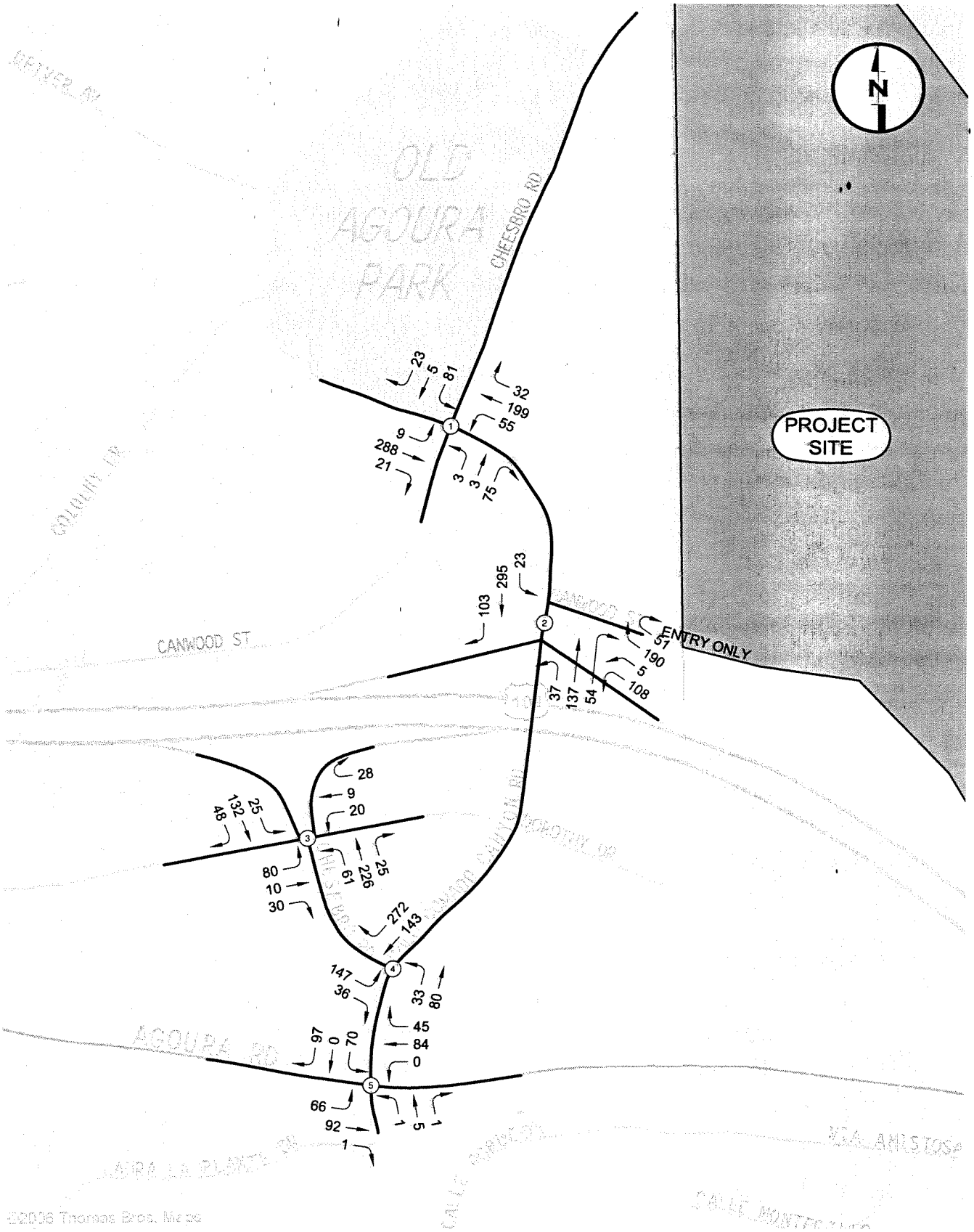

FIGURE 13(b)

2/27/2007

HIRSCH GREEN

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FUTURE (2010) TRAFFIC VOLUMES
WITH SPECIAL EVENT
SUNDAY ARRIVAL SCENARIO

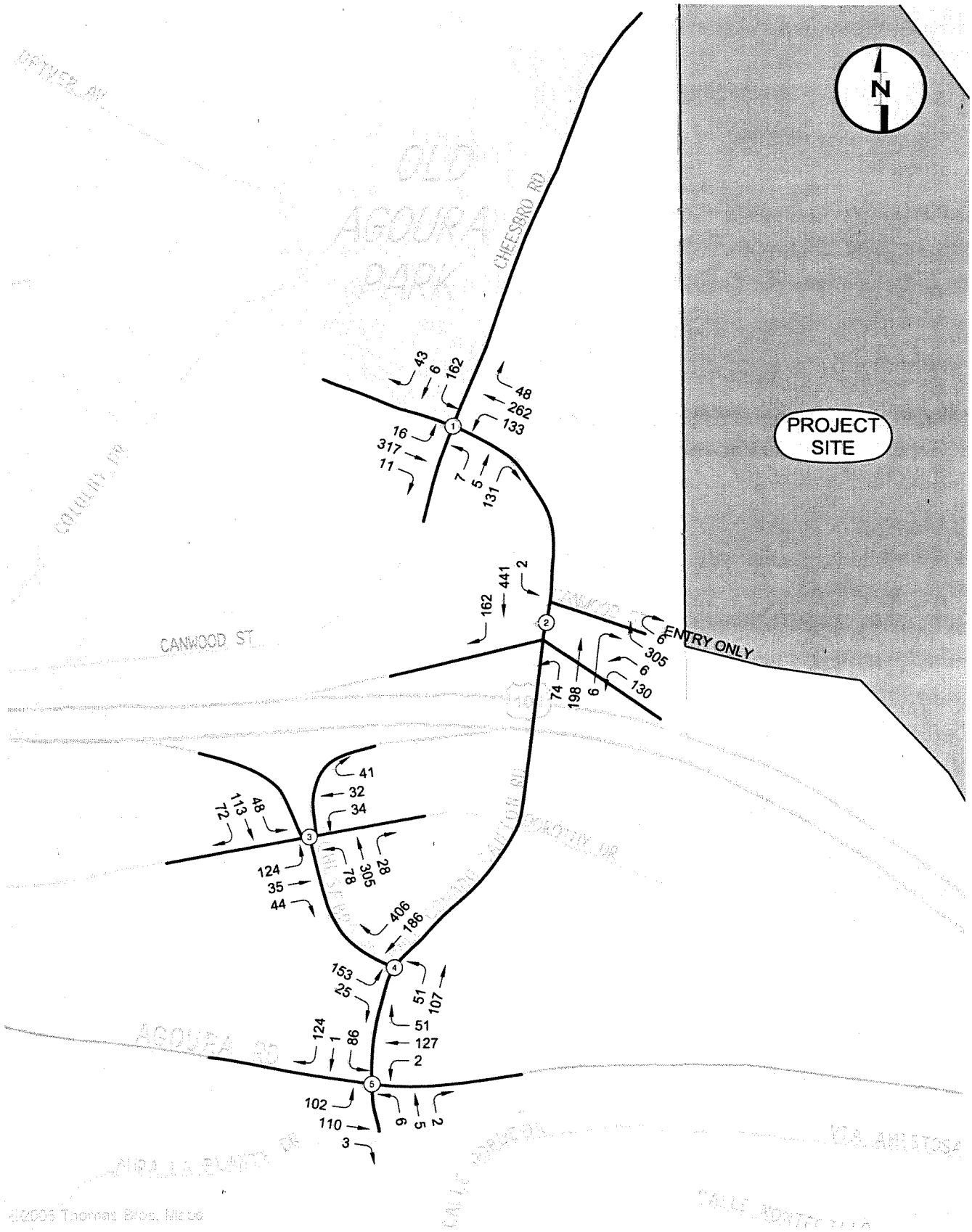

FIGURE 14(a)

HIRSCH GREEN

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FUTURE (2010) TRAFFIC VOLUMES
WITH SPECIAL EVENT
SATURDAY DEPARTURE SCENARIO

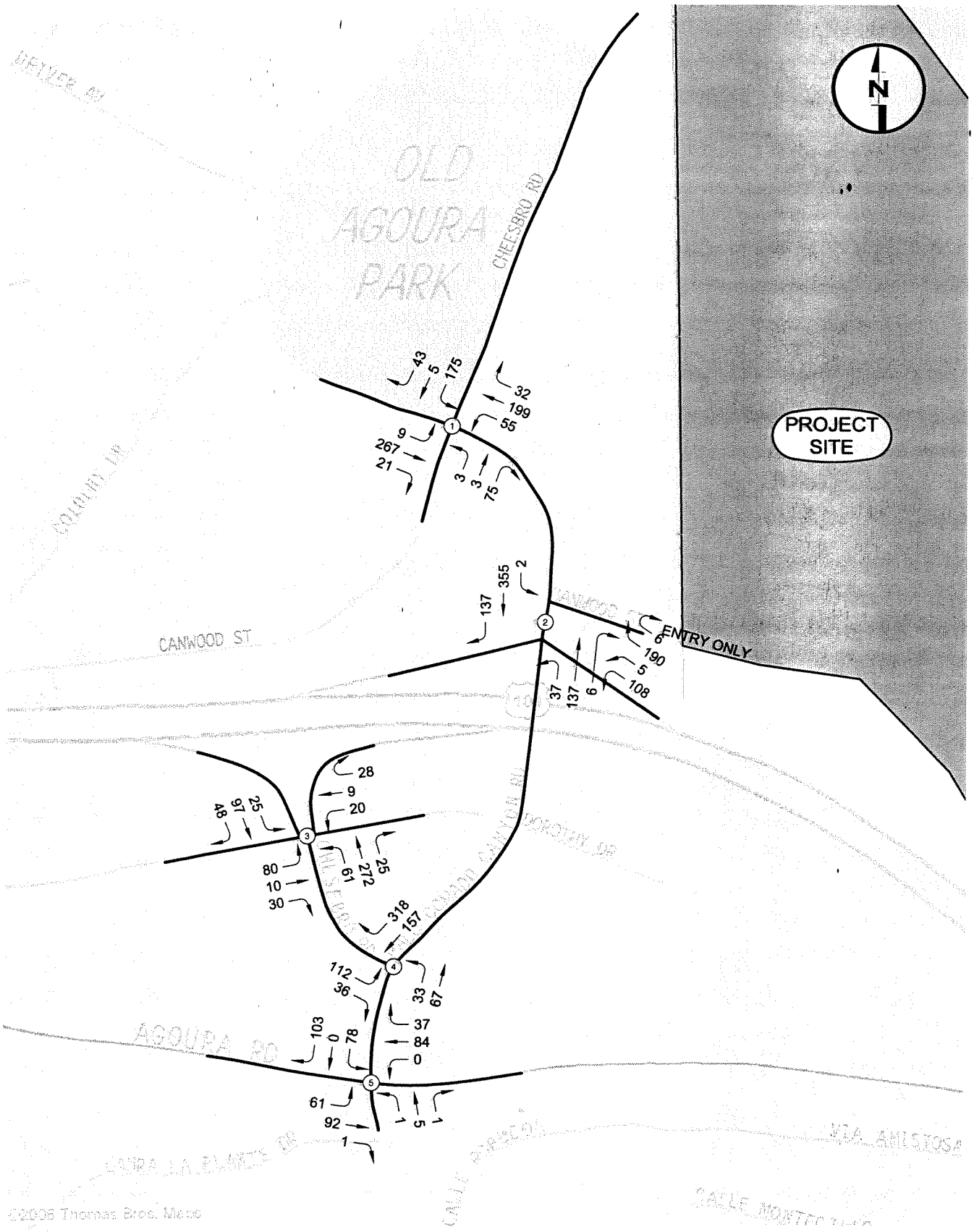

FIGURE 14(b)

2/27/2007

HIRSCH GREEN

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FUTURE (2010) TRAFFIC VOLUMES
WITH SPECIAL EVENT
SUNDAY DEPARTURE SCENARIO

Table 8
Critical Movement Analysis Summary
Future (2010) Without and With Heschel School Special Event Weekend Conditions

No.	Intersection	Day	Without Project		With Special Event - Arrival Scenario			With Special Event - Departure Scenario		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
1	Canwood St./Chesebro Rd. at Driver Ave./Palo Comado Cyn. Rd.	Saturday	0.498	A	0.526	A	0.028	0.587	A	0.089
		Sunday	0.389	A	0.418	A	0.029	0.482	A	0.093
2	Palo Comado Cyn. Rd. at US-101 Fwy. NB Ramps	Saturday	0.633	B	0.700	B	0.067	0.695	B	0.062
		Sunday	0.433	A	0.501	A	0.068	0.496	C	0.063
3	Chesebro Rd./US-101 Fwy. SB Ramps at Dorothy Dr.	Saturday	0.537	A	0.542	A	0.005	0.580	A	0.043
		Sunday	0.393	A	0.398	A	0.005	0.436	A	0.043
4	Chesebro Rd. & Palo Comado Cyn. Rd. at Chesebro Rd.	Saturday	0.410	A	0.432	A	0.022	0.455	A	0.045
		Sunday	0.309	A	0.330	A	0.021	0.354	A	0.045
5	Chesebro Rd. & Laura La Plante Dr. at Agoura Rd.	Saturday	0.402	A	0.415	A	0.013	0.416	A	0.014
		Sunday	0.289	A	0.303	A	0.014	0.303	A	0.014

Note:

* indicates a significant impact per Los Angeles County Department of Public Works, *Traffic Impact Analysis Report Guidelines*, January 1, 1997.

Analysis of Special Events Impacts to Neighborhood Streets

The results of the analysis of Special Events at the interim School indicate that no significant traffic impacts are anticipated at any of the five study intersections. However, as described previously in the typical weekday operations analysis, the potential impacts to Chesebro Road were also investigated, since the proposed "one-way loop" access scheme would divert the School's outbound (exiting) traffic to this roadway between the School's exit driveway and the intersection of Driver Avenue/Palo Comado Canyon Road at Canwood Street/Chesebro Road.

A review of the original project traffic study indicates that no specific analysis of Special Events on neighborhood streets was included, since that study noted that such Special Events traffic generation was within the "envelope" analyzed related to typical weekday operations of the full enrollment 750-student School. However, due to the previously analyzed carpool/busing program, the interim School results in a substantially reduced trip generation profile as compared to the potential maximum-attendance Special Event. Therefore, since the original project traffic study did not include any weekend daily traffic volume data, new 24-hour traffic counts were conducted on Chesebro Road along the segment between the School's exit driveway and the intersection of Driver Avenue/Palo Comado Canyon Road at Canwood Street/Chesebro Road to provide the daily traffic volume data for Saturday and Sunday conditions, which are the basis for the evaluation of neighborhood traffic impacts.

These existing daily traffic volumes were then adjusted to represent the forecast "Future (2010) Without Special Event" volumes using the same 2.0 percent annual traffic growth factor described previously in this report. The anticipated Special Event traffic was then added to this baseline, to produce the "with Special Event" traffic volumes for this roadway segment. Note that the analysis of neighborhood impacts does not differentiate between "pre-event arrival" and "post-event departure" scenarios; since neighborhood traffic impacts are evaluated based on daily traffic additions, the incremental daily Special Event traffic will be one-half of the total anticipated daily traffic estimate shown in Table 7, independent of the time the event occurs. Note also that the neighborhood impact analysis does not factor in the arrival or departure times on the Special Event attendees, since all Special Event traffic will occur on the same day, and therefore, regardless of when attendees depart the site, they are included in the daily trip estimate. The results of the analysis of weekend Special Events on Chesebro Road, including the existing (2007) traffic, forecast future (2010) "Without Event", and future "With Event" and incremental Special Event impacts, are summarized in Table 9.

Table 9
Local/Neighborhood Street Average Daily Traffic Impact Analysis
Existing (2007) and Future (2010) Without and With Weekend Special Events Conditions

Street/Segment	Peak Period	Existing (2007) ADT	Future (2010) Without Project ADT	Future (2010) Net Project ADT	Future (2010) With Project ADT	Project Impact	Significance Threshold	Significant Impact
Chesebro Rd.	Saturday	1,540	1,634	178	1,812	9.8%	12.0%	No
N/o Driver Ave.	Sunday	1,549	1,644	178	1,822	9.8%	12.0%	No

As shown in Table 9, the anticipated level of traffic resulting from the identified Special Event scenarios (445 attendees at 2.5 AVO) will not result in significant impacts to Chesebro Road on either Saturday or Sunday, and no mitigation measures are warranted. However, as described earlier in the analysis of Special Event traffic on the study intersections, it is recommended that the School provide temporary traffic control officers at the entry and exit locations for the School, as well as at the intersection of Driver Avenue/Palo Comado Canyon Road at Canwood Street/Chesebro Road during high attendance Special Events, to ensure that no substantial traffic congestion or delays result from these activities. It should be reiterated that the attendance levels identified in this analysis for Special Events is a direct result of the assumed vehicle occupancy factor. The maximum number of attendees could increase if the AVO for the Special Event is increased through more carpooling and/or shuttles or buses to and from the School, as long as the maximum number of pce trips shown in Table 8 is not exceeded.

Analysis of Cumulative Weekend Traffic Impacts During Special Events

Finally, as described in the discussion of the analysis of the typical weekday interim School traffic impacts, the on-going or proposed development of other projects in the study vicinity could also add traffic to the study intersections during weekends. The same cumulative projects identified in the original project traffic study were again included in the assessment of future build out conditions in the project area for the Special Events analysis. The trip generation estimates for these projects and the resulting trip assignments at the five study intersections was obtained directly from the approved project traffic study; the total cumulative development traffic at the study intersections, not including trips generated by the potential Heschel School Special Events, is shown in Figure 15(a) for Saturday peak hour conditions, and in Figure 15(b) for Sunday peak hour conditions.

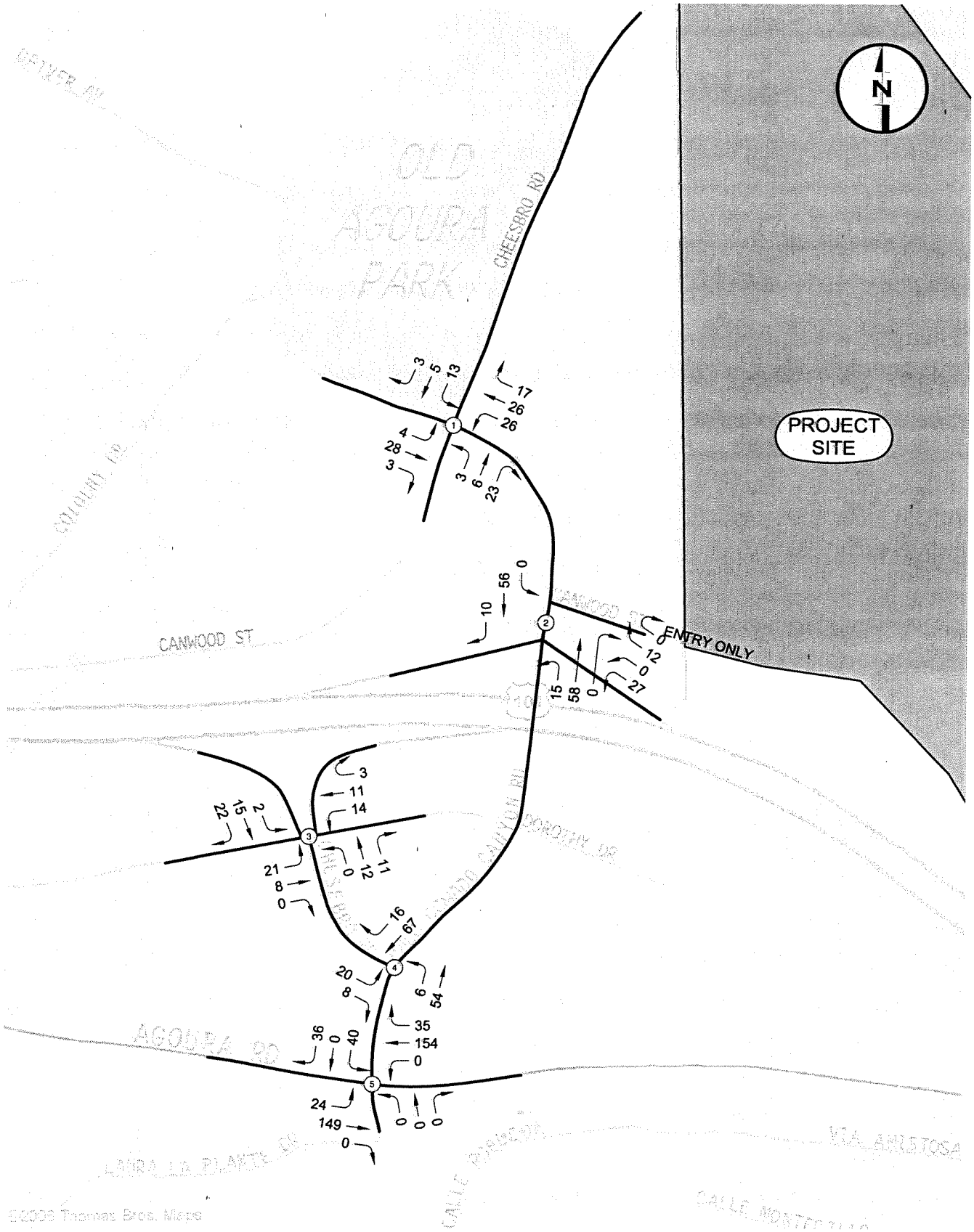

FIGURE 15(a)

HIRSCH GREEN

Hirsch/Green Transportation Consulting, Inc.

FUTURE (2010) TRAFFIC VOLUMES
CUMULATIVE DEVELOPMENT
SATURDAY PEAK HOUR

2/27/2007

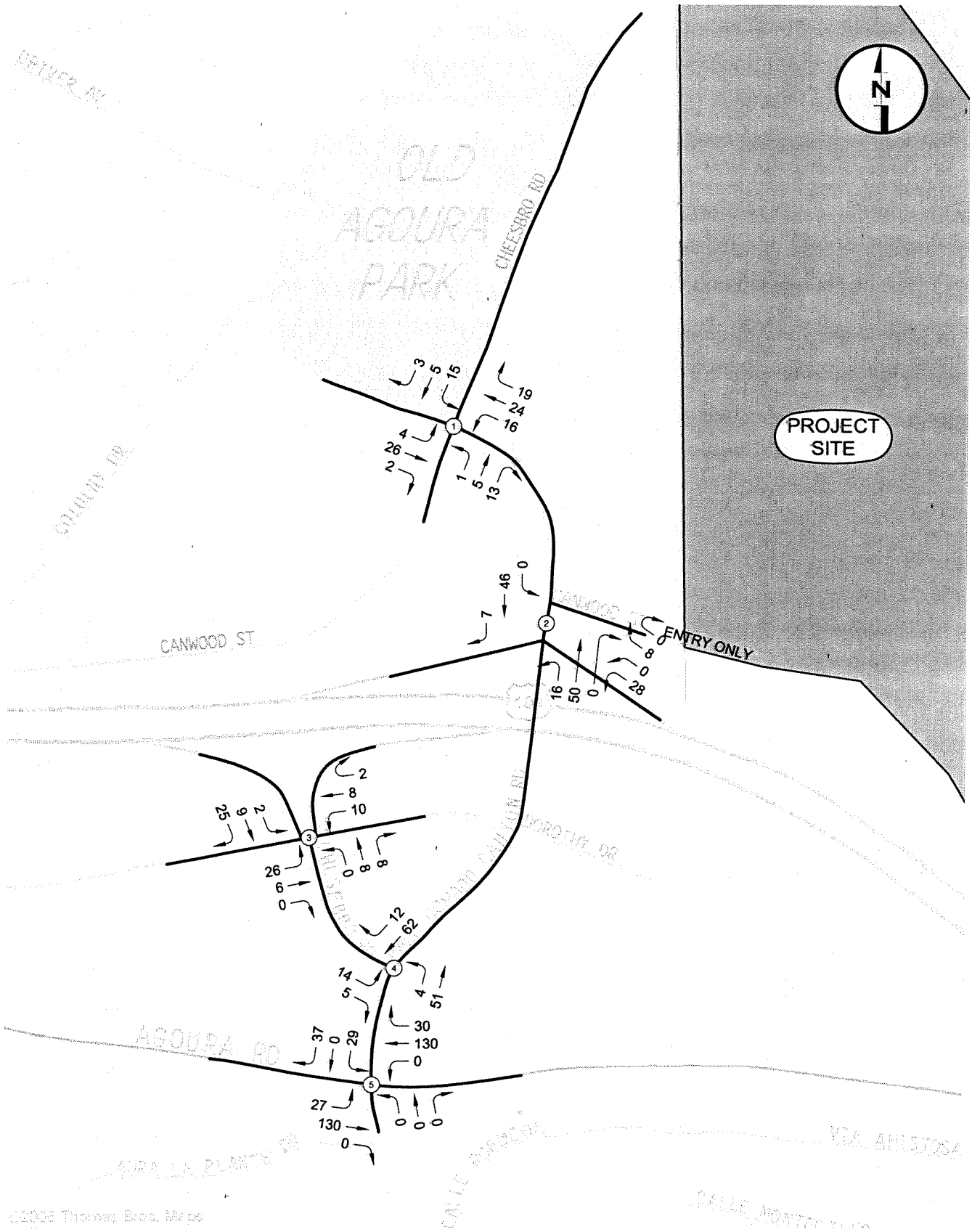

FIGURE 15(b)

HIRSCH GREEN

Hirsch/Green Transportation Consulting, Inc.

FUTURE (2010) TRAFFIC VOLUMES
CUMULATIVE DEVELOPMENT
SUNDAY PEAK HOUR

The cumulative development traffic volumes shown in Figures 15(a) and 15(b) were then combined with the "With Special Event" scenarios shown earlier in Figures 13(a) and 13(b) (for "arrival" conditions) and Figures 14(a) and 14(b) (for "departure" conditions), to produce the "With Cumulative Development plus Special Event" traffic volume estimates. The "Pre-Event Arrival" cumulative conditions traffic volumes are shown in Figure 16(a) for the Saturday peak hour and in Figure 16(b) for Sunday conditions. Figures 17(a) and 17(b) show the "Post-Event Departure" scenario traffic volumes for Saturday and Sunday, respectively. The cumulative development traffic conditions shown in Figures 16 and 17 were evaluated using the same CMA methodologies described earlier in this report, and the results are summarized in Table 10. As indicated in this table, the addition of cumulative development traffic would substantially worsen the traffic conditions at several of the study intersections.

The cumulative traffic additions could produce one significant impact under the Special Event "arrival" traffic scenario, at Palo Comado Canyon Road and the US-101Ramps/Canwood Street during, but only during Saturday conditions; Sunday intersection levels of service provide adequate capacity to accommodate both the anticipated interim Heschel School Special Events and cumulative development traffic without significant impacts. Similarly, the "Post-Event Departure" cumulative scenario will also impact this same intersection on Saturday, and again, no significant impacts are anticipated during Sunday conditions.

Measures to address the cumulative traffic impacts resulting from the additional related project trips during the weekend Special Events activities are described in detail in the approved project traffic study, and in the Heschel School EIR. These cumulative improvements are similar to those identified for the full enrollment project "cumulative" impact scenario. However, as with the "With Special Event" conditions summarized earlier in Table 8, the both the magnitude of the cumulative impacts and the final levels of service (with interim School operations) are similar to or better than the impacts and LOS conditions identified for cumulative impacts during the weekday peak hour traffic conditions. As a result, no additional cumulative impacts beyond those previously identified are anticipated under the Special Events scenarios, and no additional cumulative mitigation measures beyond those identified in the original study are necessary.

Further, as described earlier in this report, the proposed Heschel School project (Special Event traffic) will contribute incrementally to these cumulative traffic impacts, and the School should make "fair share" contributions toward the cumulative mitigation improvements, as discussed in detail in the approved project traffic study and project EIR.

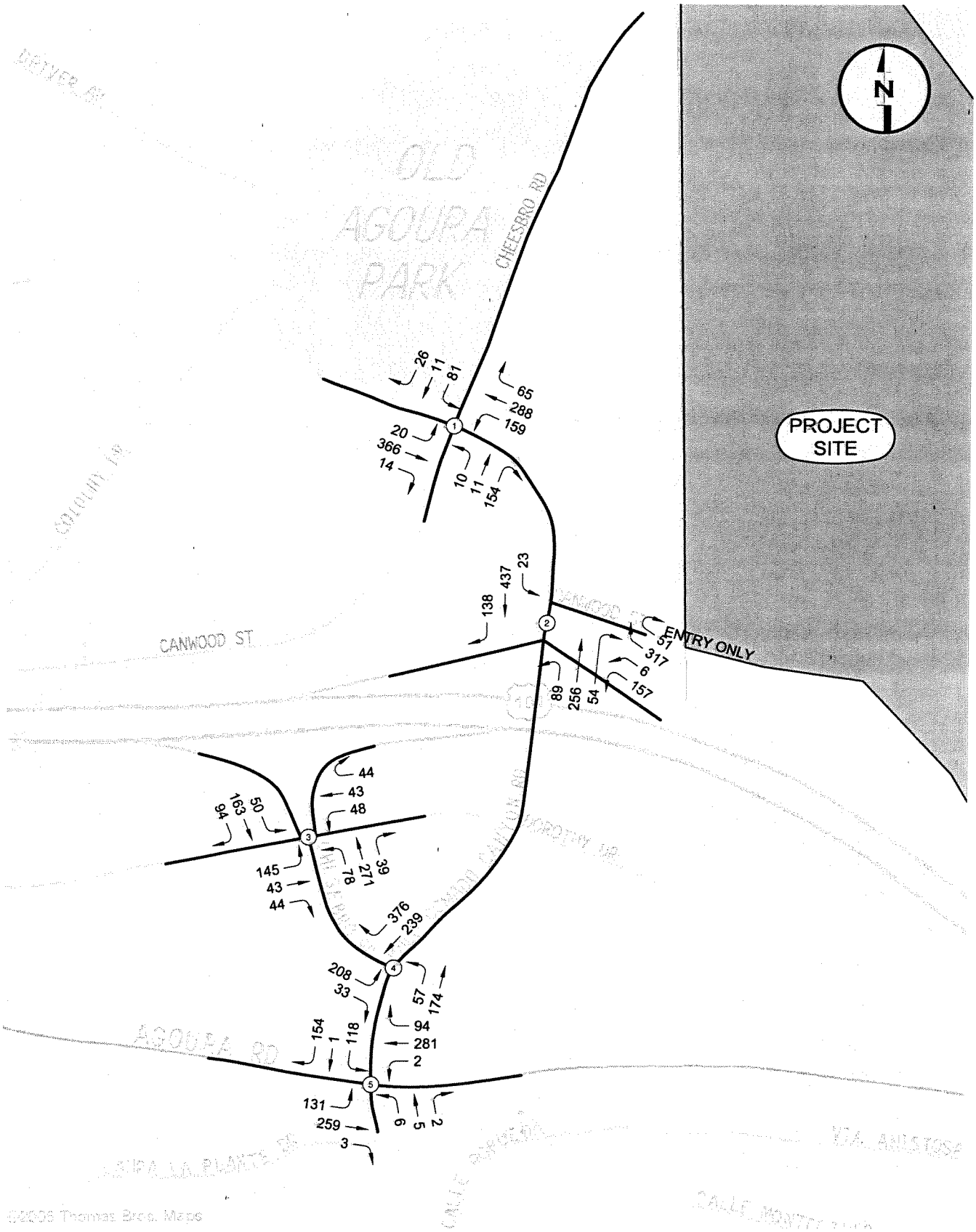

FIGURE 16(a)

HIRSCH GREEN

Hirsch/Green Transportation Consulting, Inc.

FUTURE (2010) TRAFFIC VOLUMES
WITH SPECIAL EVENT PLUS CUMULATIVE DEVELOPMENT
SATURDAY ARRIVAL SCENARIO

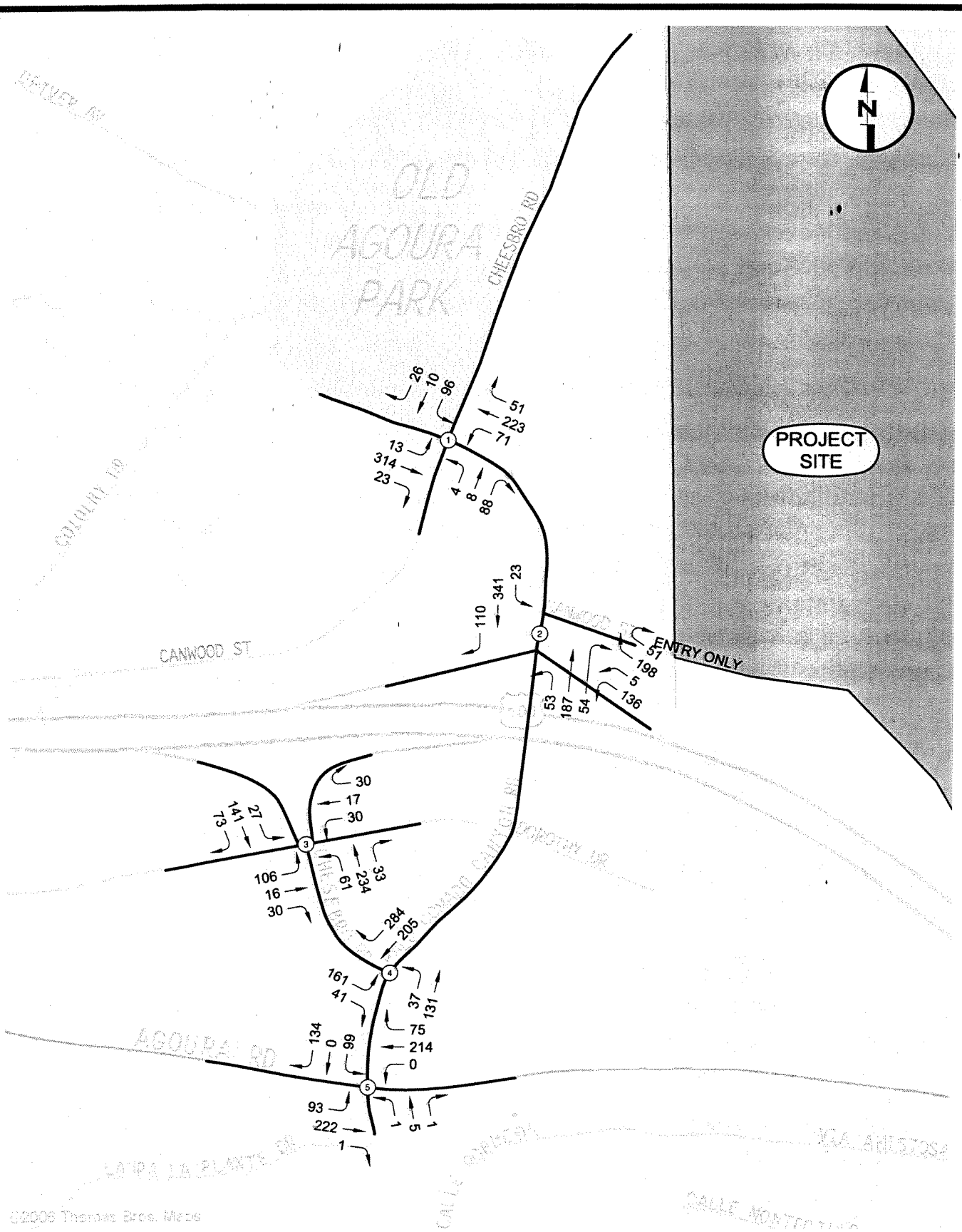

FIGURE 16(b)

2/27/2007

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FUTURE (2010) TRAFFIC VOLUMES
WITH SPECIAL EVENT PLUS CUMULATIVE DEVELOPMENT
SUNDAY ARRIVAL SCENARIO

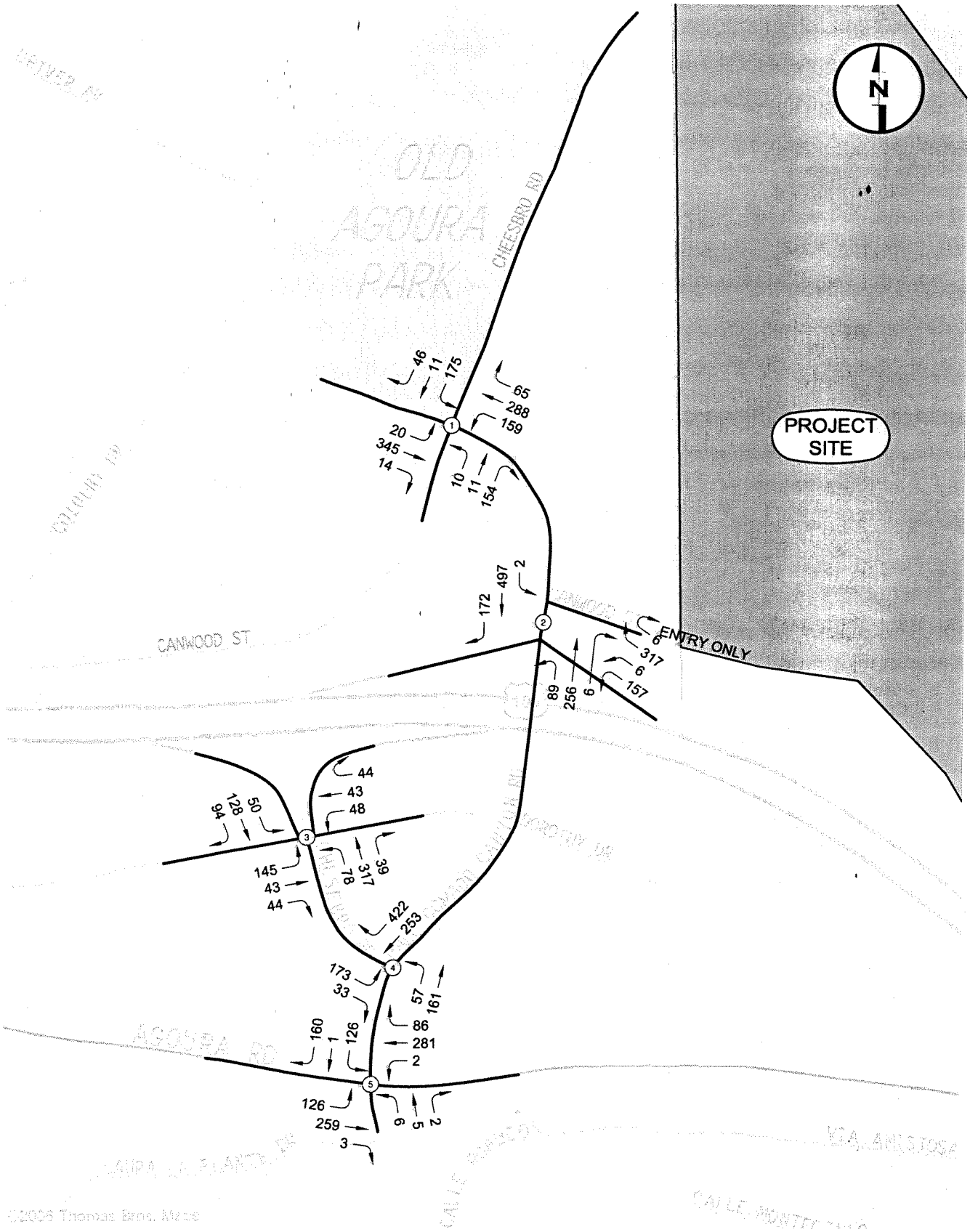

FIGURE 17(a)

HIRSCH GREEN

Hirsch/Green Transportation Consulting, Inc.

FUTURE (2010) TRAFFIC VOLUMES
WITH SPECIAL EVENT PLUS CUMULATIVE DEVELOPMENT
SATURDAY DEPARTURE SCENARIO

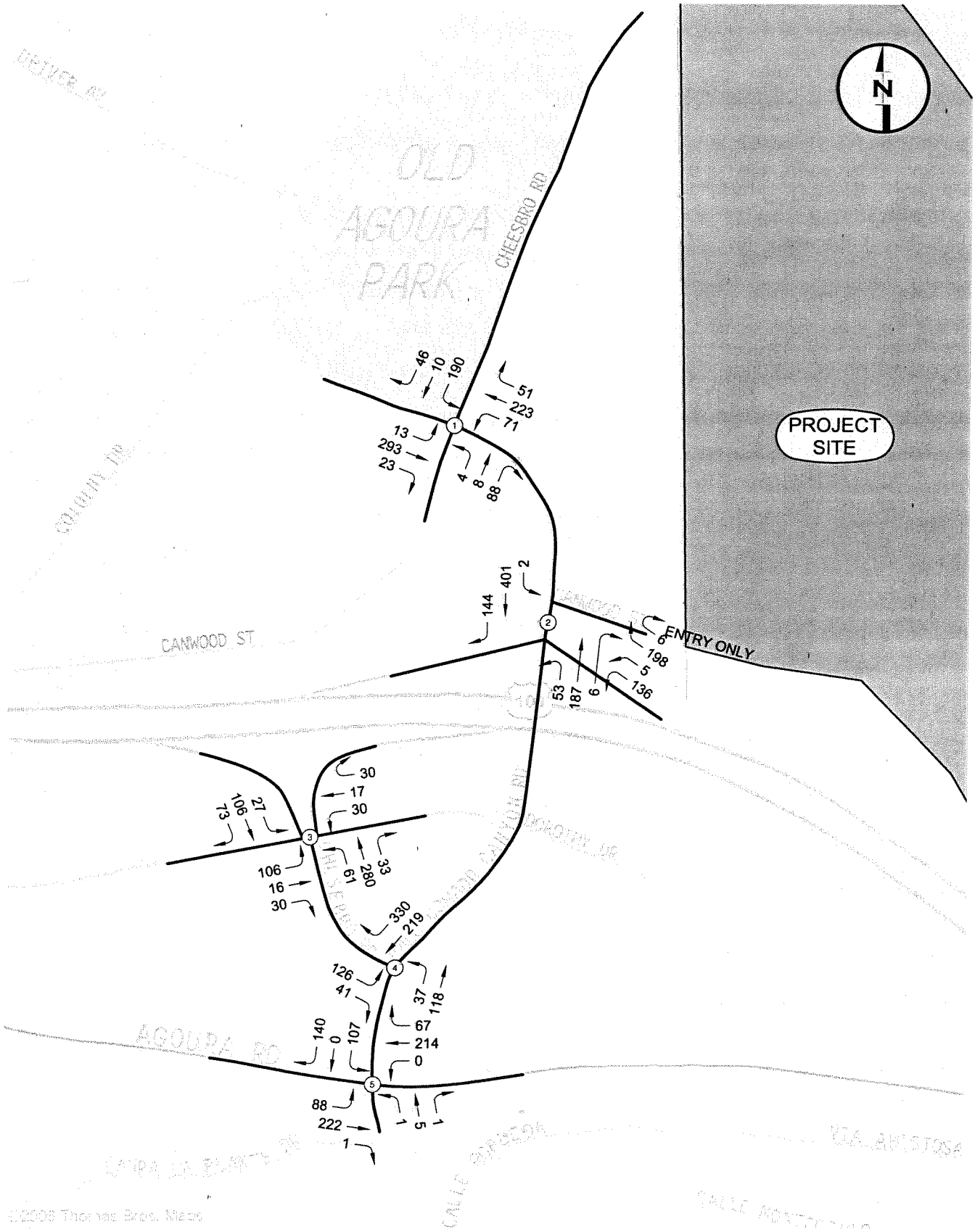

FIGURE 17(b)

FUTURE (2010) TRAFFIC VOLUMES
WITH SPECIAL EVENT PLUS CUMULATIVE DEVELOPMENT
SUNDAY DEPARTURE SCENARIO

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

2/27/2007

Table 10
Critical Movement Analysis Summary
Future (2010) Without and With Cumulative Development plus Special Event Weekend Conditions

Int No.	Intersection	Day	Without Project		With Cumulative Development: With Special Event - Arrival Scenario			With Cumulative Development: With Special Event - Departure Scenario		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
1	Canwood St./Chesebro Rd. at Driver Ave./Palo Comado Cyn. Rd.	Saturday	0.498	A	0.595	A	0.097	0.656	B	0.158
		Sunday	0.389	A	0.474	A	0.085	0.542	A	0.153
2	Palo Comado Cyn. Rd. at US-101 Fwy. NB Ramps	Saturday	0.633	B	0.769	C	0.136 *	0.764	C	0.131 *
		Sunday	0.433	A	0.559	A	0.126	0.554	A	0.121
3	Chesebro Rd./US-101 Fwy. SB Ramps at Dorothy Dr.	Saturday	0.537	A	0.598	A	0.061	0.637	B	0.100
		Sunday	0.393	A	0.448	A	0.055	0.487	A	0.094
4	Chesebro Rd. & Palo Comado Cyn. Rd. at Chesebro Rd.	Saturday	0.410	A	0.462	A	0.052	0.485	A	0.075
		Sunday	0.309	A	0.370	A	0.061	0.375	A	0.066
5	Chesebro Rd. & Laura La Plante Dr. at Agoura Rd.	Saturday	0.402	A	0.656	B	0.254	0.657	B	0.255
		Sunday	0.289	A	0.513	A	0.224	0.514	A	0.225

Note:

* indicates a significant impact per Los Angeles County Department of Public Works, *Traffic Impact Analysis Report Guidelines*, January 1, 1997.

MITIGATION MEASURES

As indicated in this project traffic analysis, the proposed interim Heschel School project are not expected to result in significant traffic impacts at any of the nearby study intersections, nor will it create significant impacts to CMP arterial roadways, intersections, or freeway segments in the vicinity. Additionally, no significant impacts are anticipated to occur on any of the residential streets surrounding the project site. As a result, no off site traffic mitigation measures are warranted in connection with the operation of the interim School described in this report.

However, as described in detail in the appendices of this report, the School will implement a number of project-related traffic demand management strategies, including periodic monitoring of the number of inbound and outbound vehicles at the School during key time periods, to ensure that the proposed student carpool/busing program will adhere to the trip limits identified in this report, and will not produce significant traffic impacts to the surrounding area. Additionally, during larger weekend Special Event activities, the School may provide a number of traffic control officers at critical site access locations and key intersections to direct vehicles to and from the School site to reduce potential traffic delays during the peak arrival and/or departure periods. These traffic control officers may also be posted during the first day or two days of each School semester, to ensure that traffic to and from the School operates in a manner consistent with the proposed carpool/busing program, and to minimize any unforeseen traffic problems during this bus program "start up" period.

Finally, although the preceding analyses show that the interim operations of the School would not create any significant impacts to any of the surrounding intersections or streets, the School may restripe the southbound approach of Palo Comado Canyon Road at the School's Canwood Street access location to provide a new exclusive left-turn pocket. This potential improvement is not warranted for either impact mitigation or safety reasons, but would provide beneficial channelization for inbound School traffic and provide a specific location out of the southbound "through" traffic flow at this location, thereby reducing potential traffic conflicts and/or blockages of the through travel lane in this direction. This measure would need to be reviewed and approved by the City of Agoura Hills. Conceptual layout and feasibility plans for such an improvement are included in the appendix of this report.

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

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P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE: T-4

September 12, 2007

Mr. Ronald Hirsch
Hirsch/Green Transportation Consulting, Inc.
578 Washington Boulevard, No. 360
Marina del Rey, CA 90292

Dear Mr. Hirsch:

HESCHEL SCHOOL
CONDITIONAL USE PERMIT 98062
MID-BLOCK ACCESS AND INTERIM SCHOOL STUDENT CARPOOL/BUSING PLAN
TRAFFIC IMPACT ANALYSIS (JUNE 2007)
AGOURA HILLS AREA

The proposed project is located just east of Palo Comado Canyon Road between Chesebro Road and the Ventura Freeway (U.S. Highway 101) in the unincorporated County of Los Angeles area of Agoura Hills.

In June 2006, the Regional Planning Commission (RPC) approved Conditional Use Permit (CUP) 98-062 for the development of the 164,850-square-foot Heschel School. The maximum enrollment for the school was 750 pre-kindergarten through eighth grade students. The RPCs decision was then appealed to the Board of Supervisors. On January 23, 2007, after hearing testimony from the project appellants and interested parties, the Board put forth a motion that required the project applicant to develop an interim traffic plan for a maximum enrollment of 390 students that fully mitigates all of the project's traffic impacts, provides an enhanced measurable and enforceable busing and/or carpool program, and includes an evaluation of alternative access routes including but not limited to one-way ingress at Canwood Street, and one-way egress at Chesebro Road. Pursuant to the Board direction, the applicant prepared and submitted to Public Works a detailed supplemental analysis on March 2007. Our May 14, 2007, comment letter (copy enclosed) contains our review of the March 2007 supplemental analysis.

TRAFFIC AND LIGHTING DIVISION

We have reviewed the latest proposal for a Mid-Block access driveway on Palo Comado Canyon Road between U.S. Highway 101 eastbound ramp and Canwood Street/Chesebro Road and find that it incorporates all of the required elements of the Board's motion. In addition, we agree with the plan that the traffic generated by the proposed interim project will not result in a significant impact at any of the surrounding roadways or intersections. However, the project shall be solely responsible for the following:

> The applicant shall be responsible for paying the full amount of the Arterial Street System Development Fee specified in the City of Agoura Hills Municipal Code prior to issuance of any building permit. The applicant shall verify with the City if any of their roadwork or other traffic mitigation measures can be used to offset this Arterial Street System Development Fee.
>
> The applicant shall enter into a secured agreement with the County to ensure the funding for the ultimate access to the site as conditioned under the CUP 98-062-(3) prior to issuance of any building permit.
>
> The applicant shall be responsible for the design and construction of the new interim signalized Mid-Block access driveway at Palo Comado Canyon Road prior to issuance of occupancy.
>
> The applicant shall improve the west side of Palo Comado Canyon Road from Canwood Street/Chesebro Road to the westbound U.S. Highway 101 on-ramp to a 32 feet half roadway improvement prior to issuance of occupancy.

Since the proposed busing/carpool plan is intended as an interim measure, the cumulative mitigation measures are the same as those included in the approved project Final Environmental Impact Report (EIR). Prior to issuance of building permits for Phase II, the applicant shall be responsible for the all the mitigation measures specified in the Final EIR and the CUP 98-062-(3).

In order to verify the school's compliance with the interim student carpool/busing plan, the County will monitor the vehicle trips to and from the school. The school shall not exceed the following vehicle trips caps for any of the peak hours or the cumulative totals of the a.m. or p.m. peak hours. The County's cost of monitoring and reporting, as well as the cost of the traffic counts including any County selected equipment are the sole responsibility of the applicant. The remaining details of the monitoring program are noted in the plan.

Peak Hours	Inbound Vehicle Trips	Outbound Vehicle Trips	Total Vehicle Trips
AM Peak Hour (7 a.m. – 8:15 a.m.)	86	39	125
Post AM Peak Hour (8:45 a.m. – 9:45 a.m.)	52	52	104
Total AM Peak Hours (7 a.m. – 9:45 a.m.)	138	91	229
Pre-PM School Peak Hour (1:15 p.m. – 2:30 p.m.)	52	52	104
PM School Peak Hour (2:30 p.m. – 3:45 p.m.)	26	40	66
Pre-PM Peak Hour (3:45 p.m. – 4:30 p.m.)	8	31	39
PM Peak Hour (4:30 p.m. – 5:45 p.m.)	5	15	20
Total PM Peak Hours (1:15 p.m. – 5:45 p.m.)	91	138	229
Total Trips	229	229	458

The interim project shall also limit the number of vehicle trips for school evening and weekend special events to 356 trips (to and from) and notify the City of Agoura Hills in advance of larger events.

If you have any questions regarding any of the above, please contact Mr. Patrick Arakawa of our Traffic Studies Section at (626) 300-4867.

Very truly yours,

DONALD L. WOLFE
Director of Public Works

WILLIAM J. WINTER
Assistant Deputy Director
Traffic and Lighting Division

PA:cn
P:\tlpub\WPFILES\FILES\STU\Pat\Heschel\EIR07165 - Heschel Mid-Block Interim Carpooling-Busing Plan TS June '07 .doc

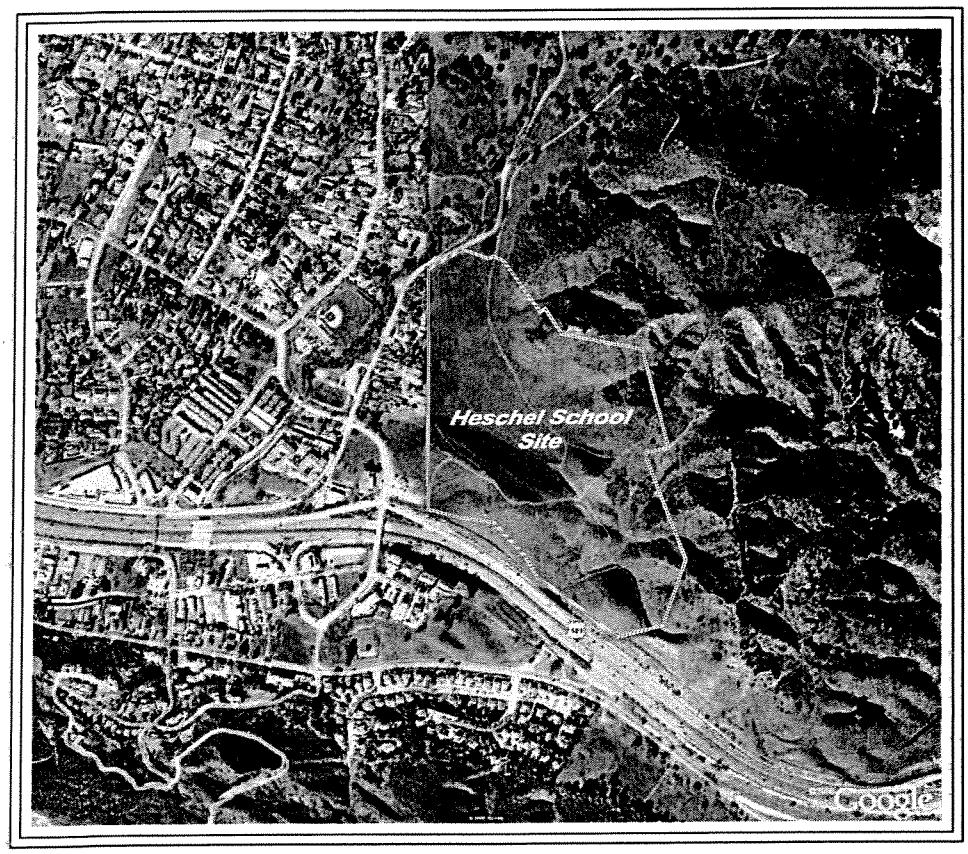
Enc.

cc: City of Agoura Hills (Ramiro Adeva)
Department of Regional Planning (Hsiao-Ching Chen)
California Department of Transportation (Rose Casey, Cheryl Powell)

bc: Land Development (Hunter, Witler)

TRAFFIC IMPACT ANALYSIS REPORT

Abraham Joshua Heschel Day School Project
Near Agoura Hills, California
Proposed Palo Comado Canyon Road Mid-Block Access and Interim 390 Student School Occupancy Plan



Prepared for:

Abraham Joshua Heschel West Day School
27400 West Canwood Street
Agoura Hills, California 91301

Prepared by:

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.
578 Washington Boulevard, #360
Marina del Rey, California 90292

JUNE 2007

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INTRODUCTION

This report provides a supplemental analysis of the effects of implementing a new "mid-block" access to the recently approved Heschel School project in Los Angeles County, adjacent to the City of Agoura Hills, pursuant to direction given by the Los Angeles County Board of Supervisors at their January 23, 2007 public hearing for the School. At that hearing, the board proposed that the Heschel School identify and implement an interim School occupancy program, potentially using an aggressive busing/carpooling program and alternative site access routes, to support an interim, reduced-enrollment 390-student campus until such time as the project's final traffic and access improvements could be designed and implemented.

Pursuant to this direction by the Board, Hirsch/Green Transportation Consulting, Inc. prepared a detailed supplemental analysis in March 2007, detailing the specific requirements, trip generation, access requirements, and traffic effects of the recommended 390-student "interim" Heschel School facilities, including the operational characteristics and traffic circulation impacts of a proposed "one-way" loop access scenario, utilizing Canwood Street as an entry-only location, and the site's "fire road" access to Chesebro Road as a temporary exit-only location. The March 2007 study also provided detailed assessments of the parameters for an interim School carpool/busing program in order to achieve the mandated trip reductions. The results of the March 2007 report, included in this report in its entirety by reference, identified that the School trip-reduction program and "one-way" loop access scenario would not produce any significant traffic impacts on the surrounding intersections or roadways, and as such, no "interim" traffic mitigation measures were required of the project under these conditions.

However, the Board's directive also included a requirement to explore "alternative" project access proposals, beyond the interim "one-way loop" operations examined in the March 2007 analyses. Therefore, in response to that requirement, this document supplements that previous analysis with an examination of the potential interim School operations if a new alternative site access were to be provided along Palo Comado Canyon Road, approximately half way between the intersections of Canwood Street/Chesebro Road and Driver Avenue/Palo Comado Canyon Road, and Palo Comado Canyon Road and the US-101 Freeway Northbound On/Off-Ramps. This potential "mid-block" access will create a new, signalized intersection to provide direct access to and from the School facilities, in lieu of the approved Canwood Street access from the project EIR, or the interim "one-way loop" scenario examined in the March 2007 report.

The parameters of this study are based on data and assumptions contained in the approved traffic study prepared for the Heschel School (Crain & Associates, Revised February 2005), as well as in the supplemental March 2007 "interim School operations" analysis report described earlier. This report supplements both of the previous documents identified above, focusing primarily on the potential impacts of the implementation of the "mid-block" access on the Board's recommended 390-student interim School. All background information on the original project and the trip generation specifics of the interim School carpool/busing program can be found in the two documents identified above.

It is of note that the certified DEIR/FEIR for the Heschel School project already examines the impacts of the proposed "new" mid-block access scheme for the "full enrollment" School occupancy scenario. However, these analyses examined School-related traffic impacts based on the trip generation profiles obtained from traffic surveys conducted at the existing School, extrapolated to the proposed 750-student enrollment level anticipate for the new School facilities. These trip generation estimates did not include any significant student carpooling or ride sharing components, and therefore reflected "worst case" traffic impacts to the area intersections and roadways surrounding the new Heschel School site.

As in the preceding analyses for the Heschel School, the potential impacts of the School were examined for the forecast future (year 2010) traffic conditions at a total of five area intersections. These intersections, listed below, represent the locations analyzed in the most likely to be affected by traffic generated by the proposed student busing program.

1. Canwood Street/Chesebro Road at Driver Avenue/Palo Comado Canyon Road
2. Palo Comado Canyon Road at US-101 Freeway Northbound On/Off-Ramps
3. Chesebro Road/US-101 Freeway Southbound On/Off-Ramps at Dorothy Drive
4. Chesebro Road and Palo Comado Canyon Road at Chesebro Road
5. Chesebro Road and Laura La Plante Drive at Agoura Road

In addition to these intersections, traffic conditions and potential project traffic impacts on several residential streets providing access to the project vicinity were also evaluated, including Driver Avenue, Chesebro Road, Palo Comado Canyon Road, and Canwood Street.

The site of the Heschel School project is located along the northeast side of Palo Comado Canyon Road within the County of Los Angeles, adjacent to the City of Agoura Hills; the location of the project site and surrounding vicinity are shown in Figure 1. The locations of the study intersections and street segments analyzed are shown in Figure 2.

HESCHEL SCHOOL - ALT ACCESS ANALYSIS \ VICINITY-1

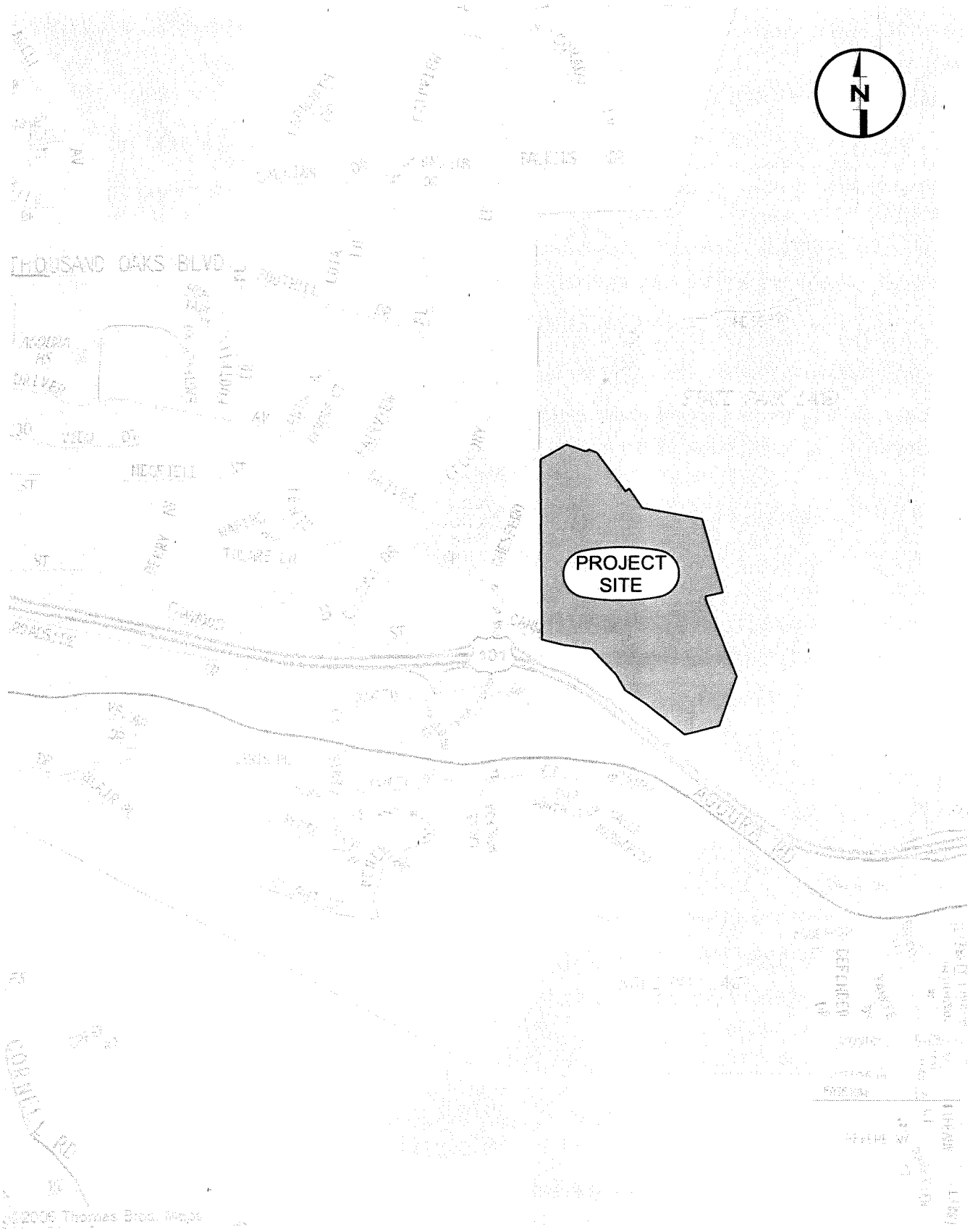

FIGURE 1

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PROJECT SITE VICINITY

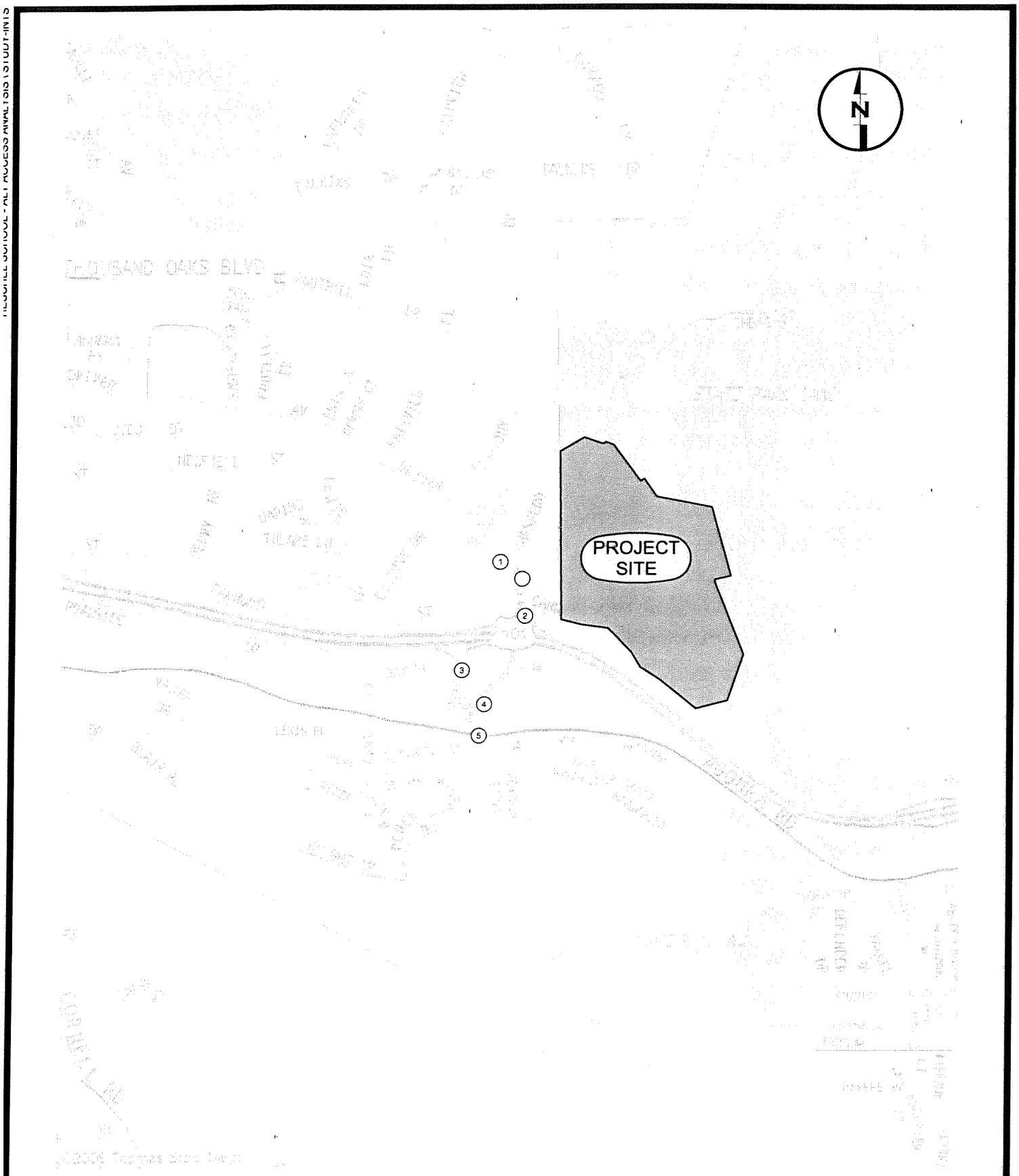

FIGURE 2

PROJECT STUDY INTERSECTIONS

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ANALYSIS OF AREA TRAFFIC CONDITIONS

Interim School Project Trip Generation Estimates

The trip generation and specific operations of the proposed interim Heschel School are described in detail in the March 2007 report. To summarize, based on staffing, enrollment, and operational factors fully described in the March 2007 analyses, the net project trip generation levels for each of six peak time periods throughout the day (AM, Post-AM, Pre-PM School, PM School Peak, Pre-PM, and PM peak hours), plus daily trips, were determined for the interim School's maximum 390-student enrollment conditions. The interim School operations plan identified three distinct elements to the School's arrival/departure timelines, Kindergarten and pre-K classes, 1st through 5th Grades, and the School's faculty/staff. A total of approximately 138 students are anticipated to be in the Kindergarten and pre-K classes at the maximum 390-student school enrollment cap. These students, generally five years or younger, operate on a limited classroom day, from approximately 9:15 AM to about 2:00 PM, and due to their ages, are not anticipated to significantly participate in a typical "busing" program. These students likely would need to be dropped-off/picked-up by a parent or guardian, although carpooling of these students will be mandatory, as described in the March 2007 report.

The remaining 252 1st through 5th Grade students will operate on a more traditional school schedule, with class start times generally around 8:00 AM, and dismissal times between 3:00 and 3:30 PM. These older students were assumed to be the primary candidates for the proposed busing program described later, although again, in order to provide flexibility, some carpooling of these students was also assumed.

Finally, the School's 71 faculty and staff generally arrive between about 7:30 and 8:00 AM. Typical of many administrative, custodial, and teaching staff, however, many of these personnel do not leave the School site at the class dismissal times, and stay to complete business or teach/participate in extracurricular after school activities. Based on information provided by the School, it is estimated that most of the staff departs the site between 15 minutes and one hour following class dismissal. In order to provide maximum flexibility for the School, and to examine the potential "worst case" traffic impacts, none of the faculty/staff were assumed to participate in the proposed busing program, although some carpool and/or ride share activity is anticipated.

The details of the specific assumptions and methodologies used to determine the interim Heschel School trip generation estimates are contained in the March 2007 study. The results of the interim School carpool/busing program trip generation calculations are shown in Table 1.

Table 1
Heschel School Interim Occupancy/Student Busing Program Trip Generation Estimates
(From March 2007 Interim Heschel School Operations Analysis)

School Population Component	Daily	AM Peak Hour (7:00 to 8:15 AM)			Post-AM Peak Hour (8:45 to 9:45 AM)			Pre-PM School Peak Hour (1:30 to 2:30 PM)		
		In	Out	Total	In	Out	Total	In	Out	Total
71 Faculty/Staff (drive alone - 1.2 AVO; assumes 20% "drop off")	142	59	12	71	0	0	0	0	0	0
138 pre-school students - driven (52 vehicles) (assumes 2.65 students/vehicle)	208	0	0	0	52	52	104	52	52	104
40 students - carpool (16 vehicles) (assumes 2.5 students/vehicle)	64	16	16	32	0	0	0	0	0	0
30 students - bused (2) buses (assumes 20 students/bus @ 75% occupancy; 1.0 PCE)	8	2	2	4	0	0	0	0	0	0
182 students - bused (6) buses (assumes 40 students/bus @ 75% occupancy; 1.5 PCE)	36	9	9	18	0	0	0	0	0	0
Total Number of Vehicles	458	86	39	125	52	52	104	52	52	104

Table 1 (continued)
Heschel School Interim Occupancy/Student Busing Program Trip Generation Estimates
(From March 2007 Interim Heschel School Operations Analysis)

School Population Component	PM School Peak Hour (2:30 to 3:45 PM)			Between PM School and PM Peak Hour (3:45 to 4:30 PM)			PM Peak Hour (4:30 to 5:45 PM)		
	In	Out	Total	In	Out	Total	In	Out	Total
71 Faculty/Staff (drive alone - 1.2 AVO; assumes 20% "drop off")	4	18	22	6	29	35	2	12	14
	(assumes 30% leaving)			(assumes 50% leaving)			(assumes 20% leaving)		
138 pre-school students - driven (52 vehicles) (assumes 2.65 students/vehicle)	0	0	0	0	0	0	0	0	0
	(assumes students leave between 1:30 and 2:00 PM)								
40 students - carpool (16 vehicles) (assumes 2.5 students/vehicle)	13	13	26	2	2	4	1	1	2
	(assumes 80% leaving)			(assumes 10% leaving)			(assumes 10% leaving)		
30 students - bused (2) buses (assumes 20 students/bus @ 75% occupancy; 1.0 PCE)	1	1	2	0	0	0	1	1	2
	(assumes 90% of buses)			(assumes no buses)			(assumes 10% of buses)		
182 students - bused (6) buses (assumes 40 students/bus @ 75% occupancy; 1.5 PCE)	8	8	16	0	0	0	1	1	2
	(assumes 90% of buses)			(assumes no buses this period)			(assumes 10% of buses)		
Total Number of Vehicles	26	40	66	8	31	39	5	15	20

As shown in Table 1, the proposed "worst case" busing program would result in a total of approximately 125 pce trips (86 inbound, 39 outbound) during the AM peak hour, 104 pce trips (52 inbound, 52 outbound) during the Post-AM peak hour, 104 pce trips (52 inbound, 52 outbound) during the Pre-PM School peak hour, 66 pce trips (26 inbound, 40 outbound) during the PM School peak hour, 39 pce trips (8 inbound, 31 outbound) during the Pre-PM peak hour, and 20 pce trips (5 inbound, 15 outbound) during the PM peak hour. The interim operations of the School are anticipated to result in a total of approximately 458 daily trips, which were calculated by adding the total inbound and outbound trips during the six peak periods; no significant trip activity is likely to occur outside these times under normal School operations.

Palo Comado Canyon Road School Access Proposal

The proposed "mid-block" Palo Comado Canyon Road access location for the Heschel School is similar to that identified in the "Alternative Access" scenario analyses contained in the original DEIR/FEIR traffic study. This access alternative will construct a new two-way access roadway from the northeast side of Palo Comado Canyon Road, at approximately the midpoint between the US-101 Northbound On/Off-Ramps and the Canwood Street/Chesebro Road intersections. Palo Comado Canyon Road will be improved (as part of roadway improvements already required for the School) to provide an exclusive northbound right-turn only lane and a new southbound left-turn lane at the new intersection. The intersection will also be signalized with a two-phase signal, actuated along the access road approach so that through traffic on Palo Comado Canyon Road is not unnecessarily stopped or delayed when School traffic is not trying to enter or exit the site during peak School operation times. The proposed location and alignment of the new School access road is shown in Figure 3.

Revised Project Traffic Distribution and Assignments

The implementation of a new "mid-block" Palo Comado Canyon Road site access location to the School will slightly change the project travel patterns identified in either the original project EIR or the supplemental interim School "one-way loop" traffic analyses. The modified project trip distribution percentages accounting for the new access road, shown in Figure 4 for each of the five study intersections, differ from the earlier analyses at only two of the five study locations, Canwood Street/Chesebro Road and Driver Avenue/Palo Comado Canyon Road, and at Palo Comado Canyon Road and the US-101 Freeway Northbound On/Off-Ramps. School trip travel patterns are expected to remain unchanged at the other study intersections. The project trip distributions were assumed to be the same for each of the six peak analysis periods.

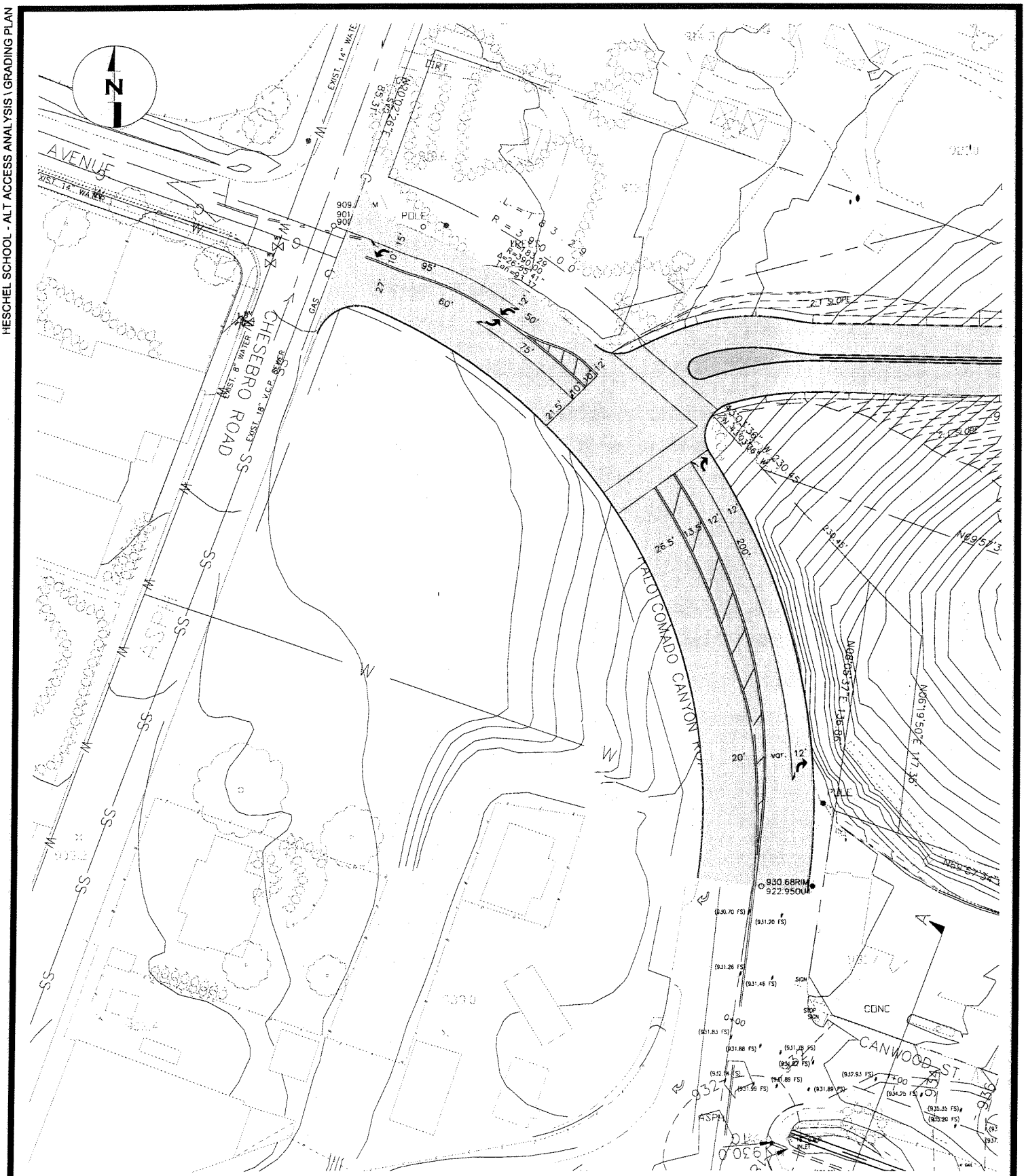

FIGURE 3

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PROPOSED MID-BLOCK
PALO COMADO CANYON ROAD
SCHOOL ACCESS

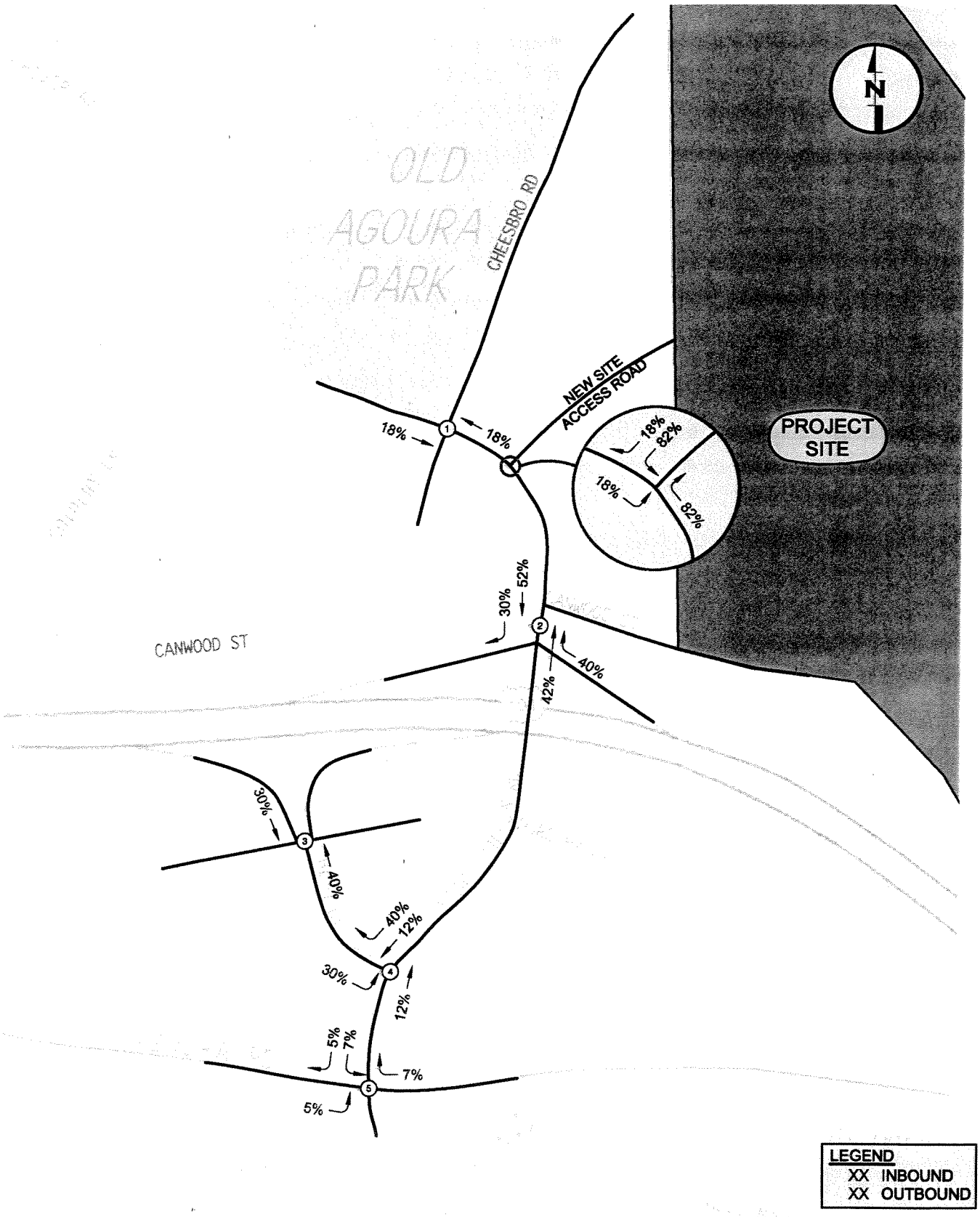

FIGURE 4

HESCHEL SCHOOL
PROPOSED PALO COMADO CANYON ROAD "MID-BLOCK" ACCESS
PROJECT TRIP DISTRIBUTION PERCENTAGES

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Using the interim School trip generation estimates shown previously in Table 1, the net project trips were assigned to the area roadways and intersections using the modified "mid-block" access distribution percentages in Figure 4. The results of the traffic assignments are shown in Figure 5(a) for the AM peak hour, Figure 5(b) for the Post-AM peak hour, Figure 5(c) for the Pre-PM School peak hour, Figure 5(d) for the PM School peak hour, Figure 5(e) for the Pre-PM peak hour, and Figure 5(f) for the PM peak hour periods. As with all previous analyses of potential project impacts, these calculations include trip "credits" for the relocation of the existing student population from the current Heschel School site near Liberty Canyon Road during the three "peak" time periods. This assumption is appropriate since trips generated by these students would "reorient" to the new School site, and their existing trips would either become incorporated into the trip generation assumed for the new School, or eliminated from some of the study intersections altogether. The "existing" Heschel School student trips using the study intersections are shown in the appendix; note that only a portion of the total existing Heschel School Liberty Canyon site trips currently travel through the study intersections, although similar School-traffic reductions are anticipated in areas outside the study civinity. No "existing" student trip credits were assumed for the "off peak" time periods, since no data was collected regarding the existing site trip generation during these times. Although it is expected that some "off peak" trip activity currently exists, this assumption guarantees a "worst case" assessment of potential impacts during the "off peak" hours.

Analysis of Future (2010) Without and With Project Traffic Conditions

As noted previously, the focus of this supplemental impact analysis is to identify and document the potential impacts associated with the proposed alternative "mid-block" Palo Comado Canyon Road access scheme for the interim, 390-student Heschel School project, with occupancy anticipated to occur by the year 2010 as identified in the approved traffic study. Therefore, in order to provide a baseline for compatible comparisons and conclusions, the future (2010) "Without Project" traffic conditions identified in both the approved EIR and supplemental March 2007 studies were again used for this supplemental analysis. The AM and PM peak hour traffic estimates for the "Future (2010) Without Project" conditions are shown in Figure 6(a) for the AM peak hour, Figure 6(b) for the Post-AM peak hour, Figure 6(c) for the Pre-PM School peak hour, Figure 6(d) for the PM School peak hour, Figure 6(e) for the Pre-PM peak hour, and Figure 6(f) for the PM peak hour periods. These traffic estimates form the "benchmark" values for determining both project-specific and cumulative development traffic impacts on the anticipated future area intersections and street system.

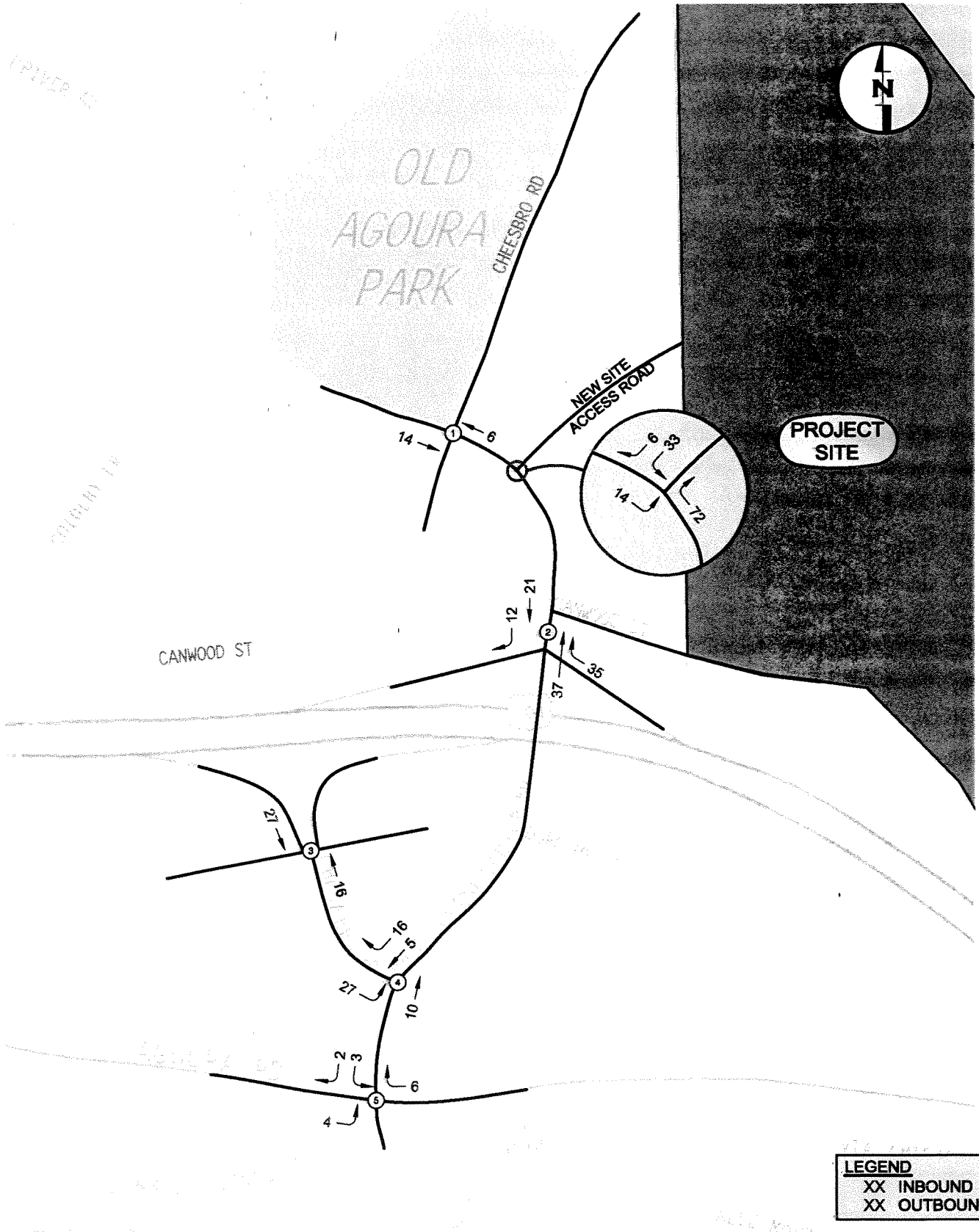

FIGURE 5(a)

HESCHEL SCHOOL INTERIM 390 STUDENT PROJECT
TOTAL NEW SCHOOL TRIPS
AM PEAK HOUR

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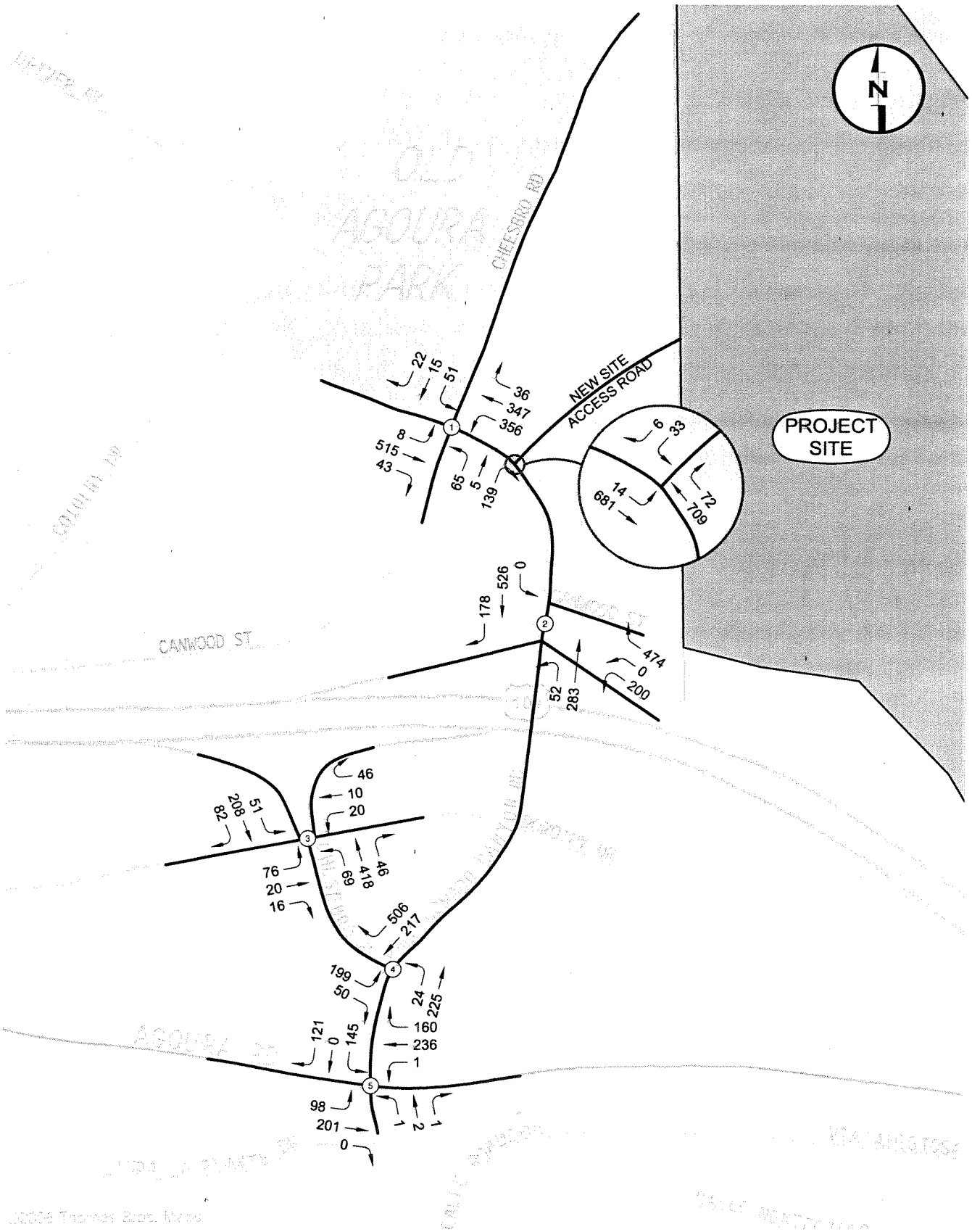

FIGURE 8(a)

FUTURE (2010) TRAFFIC VOLUMES
WITH INTERIM 390 STUDENT PROJECT
PLUS CUMULATIVE DEVELOPMENT
AM PEAK HOUR

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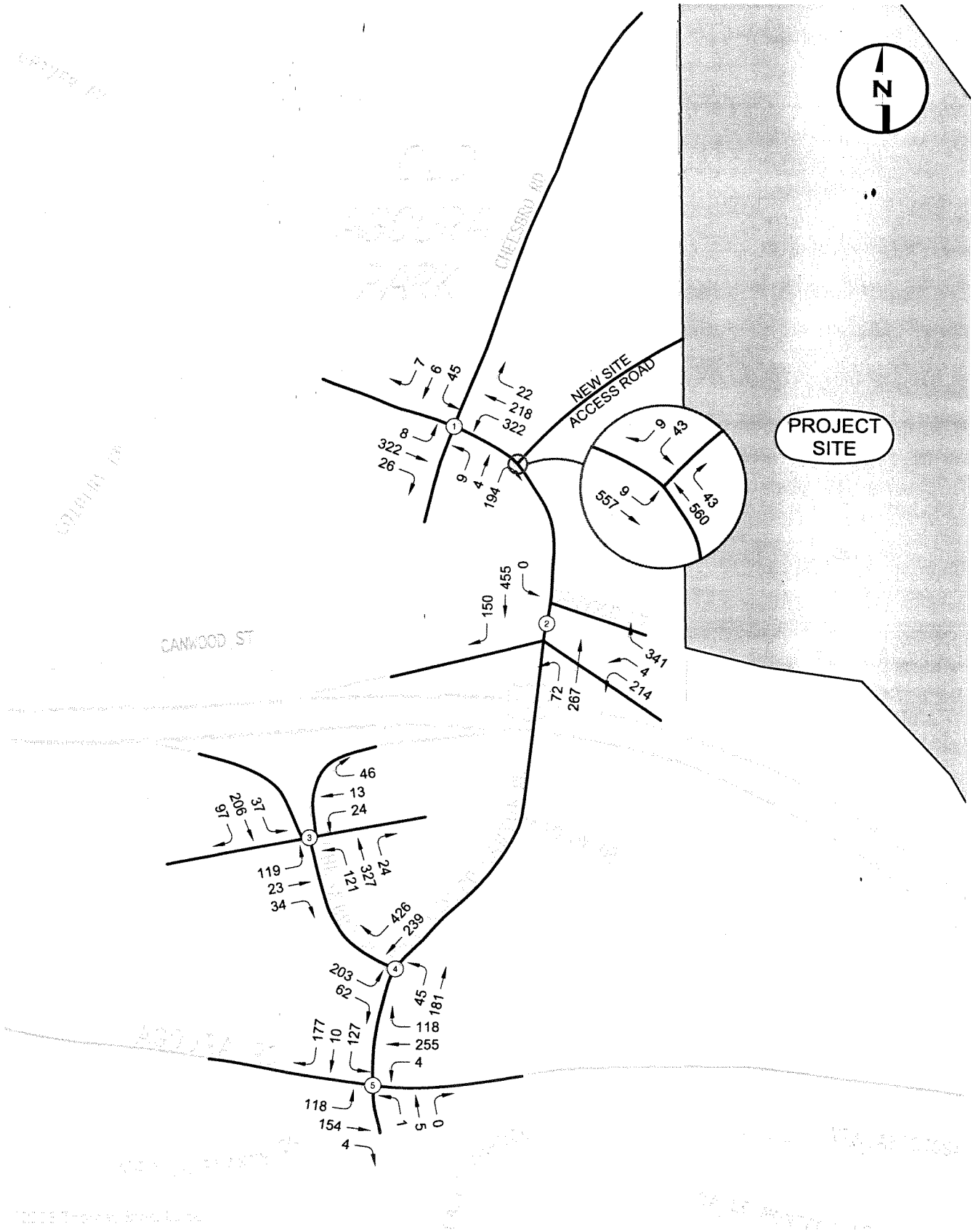

FIGURE 8(b)

FUTURE (2010) TRAFFIC VOLUMES
WITH INTERIM 390 STUDENT PROJECT
PLUS CUMULATIVE DEVELOPMENT
POST-AM PEAK HOUR

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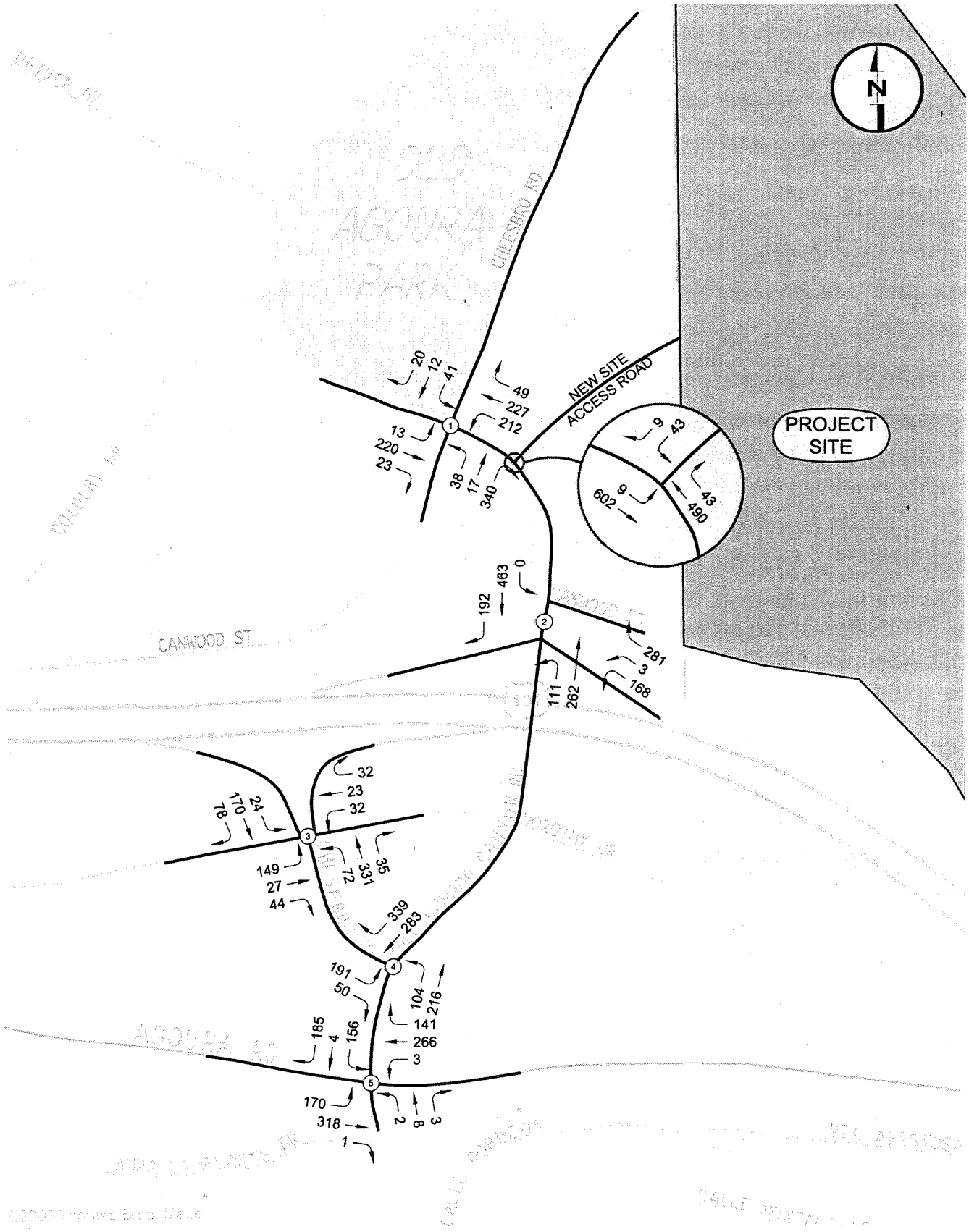

FIGURE 8(c)

FUTURE (2010) TRAFFIC VOLUMES
WITH INTERIM 390 STUDENT PROJECT
PLUS CUMULATIVE DEVELOPMENT
PRE-PM SCHOOL PEAK HOUR

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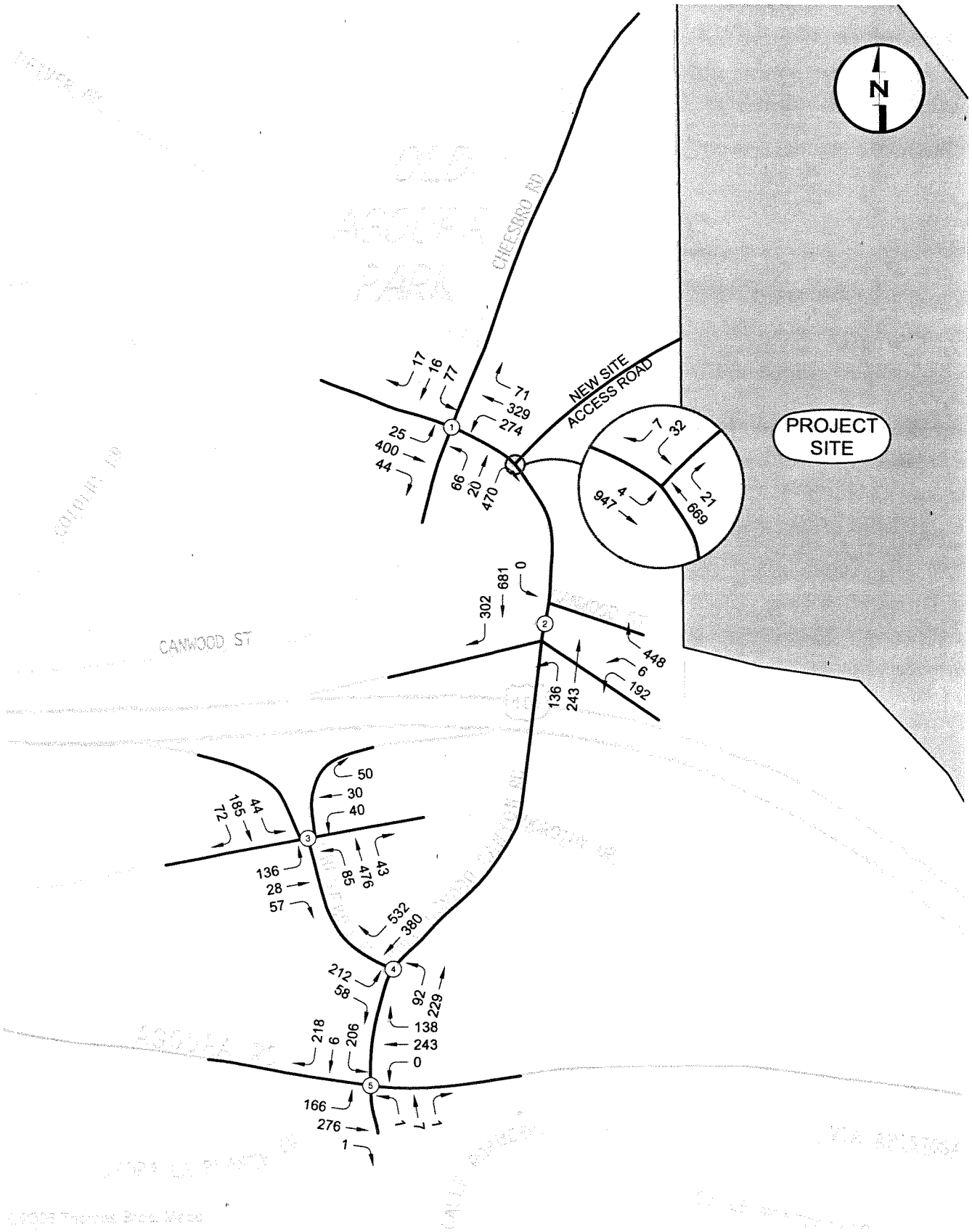

FIGURE 8(d)

FUTURE (2010) TRAFFIC VOLUMES
WITH INTERIM 390 STUDENT PROJECT
PLUS CUMULATIVE DEVELOPMENT
SCHOOL PM PEAK HOUR

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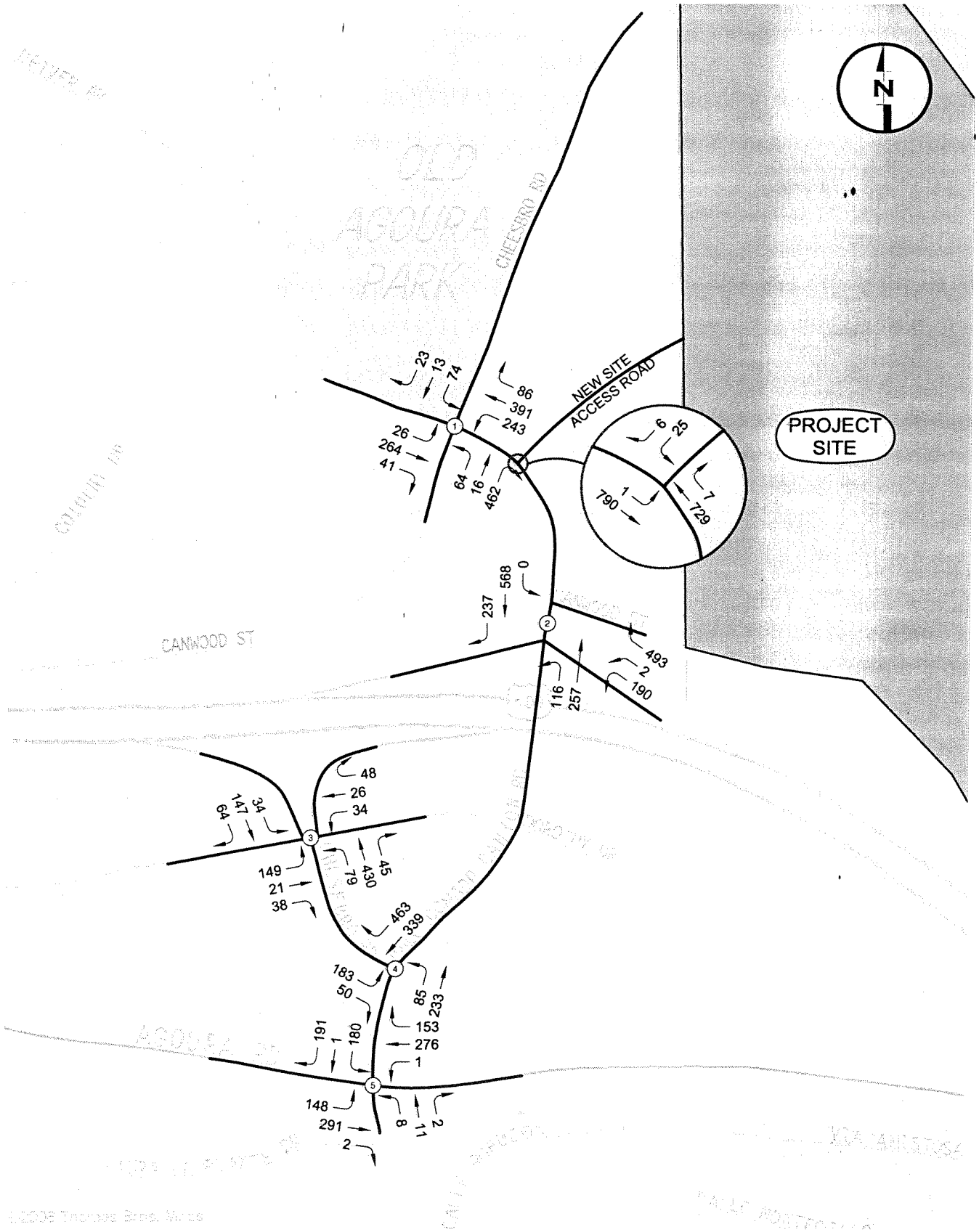

FIGURE 8(e)

FUTURE (2010) TRAFFIC VOLUMES
WITH INTERIM 390 STUDENT PROJECT
PLUS CUMULATIVE DEVELOPMENT
PRE-PM PEAK HOUR

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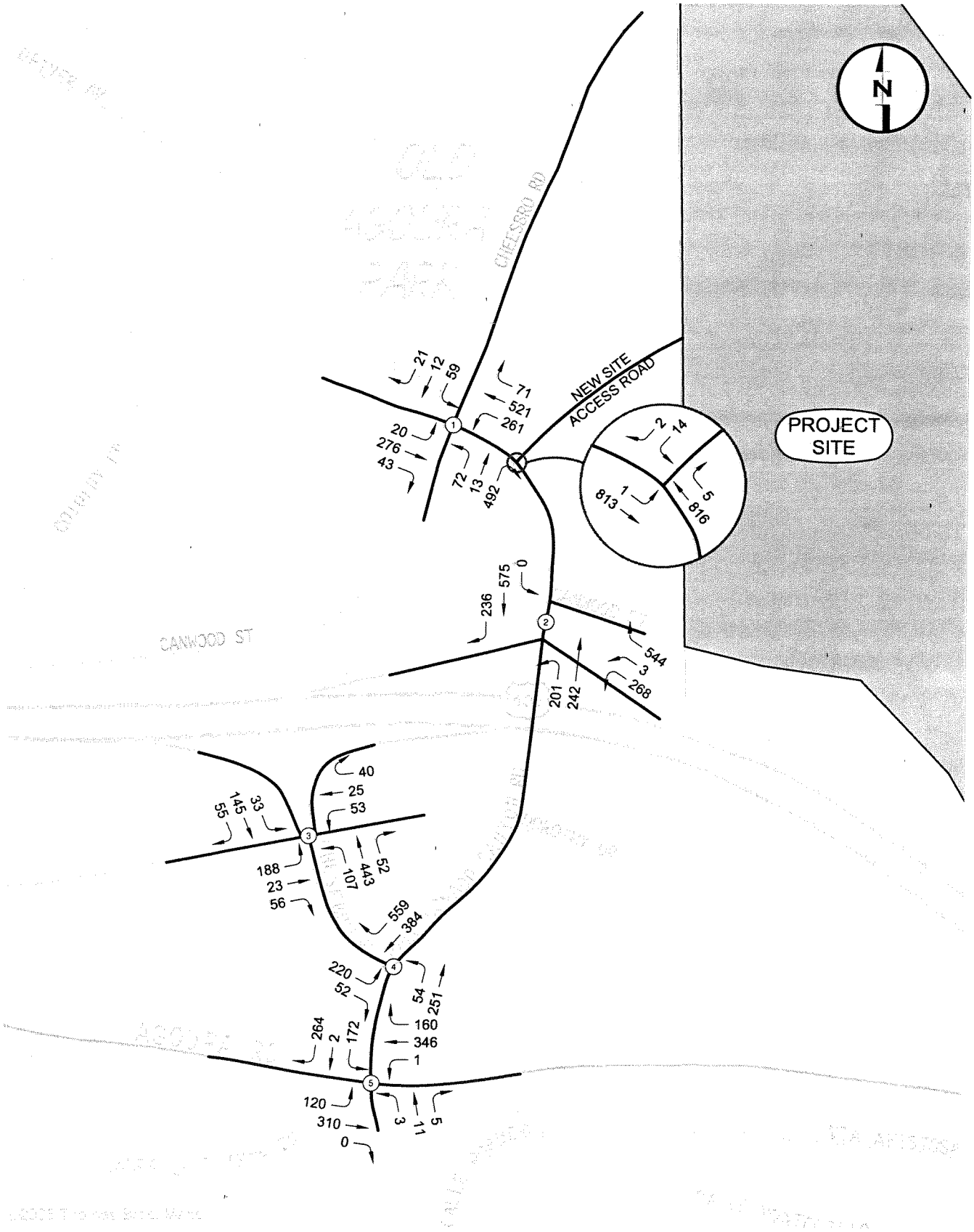

FIGURE 8(f)

FUTURE (2010) TRAFFIC VOLUMES
WITH INTERIM 390 STUDENT PROJECT
PLUS CUMULATIVE DEVELOPMENT
PM PEAK HOUR

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Table 4
Critical Movement Analysis Summary
Future (2010) Without and With Cumulative Development
(Including Interim Heschel School with Mid-Block Access)

Int. No.	Intersection	Peak Period	Without Project		With Mid-Block Access and Student Carpool			With Cumulative Development			Project % of Cumulative Impact
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact	
1	Canwood St./Chesebro Rd. at Driver Ave./Palo Comado Cyn. Rd.	AM	0.709	C	0.702	C	-0.007	0.896	D	0.187 *	n/a
		Post-AM	0.538	A	0.546	A	0.008	0.630	B	0.092	8.7%
		Pre-PM School	0.390	A	0.398	A	0.008	0.619	B	0.229	3.5%
		PM School	0.748	C	0.740	C	-0.008	0.961	E	0.213 *	n/a
		Pre-PM	0.602	B	0.603	B	0.001	0.823	D	0.221 *	0.5%
		PM	0.733	C	0.733	C	0.000	0.856	D	0.123 *	0.0%
n/a	Palo Comado Cyn. Rd. at New Project Access Road	AM	----	---	0.548	A	---	0.635	B	---	n/a
		Post-AM	----	---	0.476	A	---	0.518	A	---	n/a
		Pre-PM School	----	---	0.379	A	---	0.545	A	---	n/a
		PM School	----	---	0.631	B	---	0.822	D	---	n/a
		Pre-PM	----	---	0.554	A	---	0.684	B	---	n/a
		PM	----	---	0.646	B	---	0.694	B	---	n/a
2	Palo Comado Cyn. Rd. at US-101 Fwy. NB Ramps	AM	0.758	C	0.785	C	0.027	0.877	D	0.119 *	22.7%
		Post-AM	0.631	B	0.672	B	0.041	0.727	C	0.096 *	42.7%
		Pre-PM School	0.481	A	0.522	A	0.041	0.715	C	0.234 *	17.5%
		PM School	0.850	D	0.866	D	0.016	1.059	F	0.209 *	7.7%
		Pre-PM	0.773	C	0.789	C	0.016	0.983	E	0.210 *	7.6%
		PM	0.978	E	0.986	E	0.008	1.103	F	0.125 *	6.4%

Table 4 (continued)
Critical Movement Analysis Summary
Future (2010) Without and With Cumulative Development
(Including Interim Heschel School with Mid-Block Access)

Int. No.	Intersection	Peak Period	Without Project		With Mid-Block Access and Student Carpool			With Cumulative Development			Project % of Cumulative Impact
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact	
3	Chesebro Rd./US-101 Fwy. SB Ramps at Dorothy Dr.	AM	0.559	A	0.573	A	0.014	0.613	B	0.054	25.9%
		Post-AM	0.551	A	0.568	A	0.017	0.593	A	0.042	40.5%
		Pre-PM School	0.467	A	0.484	A	0.017	0.595	A	0.128	13.3%
		PM School	0.633	B	0.647	B	0.014	0.758	C	0.125 *	11.2%
		Pre-PM	0.580	A	0.590	A	0.010	0.704	C	0.124 *	8.1%
		PM	0.724	C	0.729	C	0.005	0.796	C	0.072 *	6.9%
4	Chesebro Rd. & Palo Comado Cyn. Rd. at Chesebro Rd.	AM	0.473	A	0.498	A	0.025	0.546	A	0.073	34.2%
		Post-AM	0.450	A	0.474	A	0.024	0.503	A	0.053	45.3%
		Pre-PM School	0.359	A	0.383	A	0.024	0.523	A	0.164	14.6%
		PM School	0.529	A	0.546	A	0.017	0.633	B	0.104	16.3%
		Pre-PM	0.456	A	0.467	A	0.011	0.554	A	0.098	11.2%
		PM	0.566	A	0.573	A	0.007	0.624	B	0.058	12.1%
5	Chesebro Rd. & Laura La Plante Dr. at Agoura Rd.	AM	0.353	A	0.333	A	-0.020	0.635	B	0.282	n/a
		Post-AM	0.480	A	0.492	A	0.012	0.675	B	0.195	6.2%
		Pre-PM School	0.420	A	0.432	A	0.012	0.773	C	0.353 *	3.4%
		PM School	0.491	A	0.474	A	-0.017	0.815	D	0.324 *	n/a
		Pre-PM	0.453	A	0.458	A	0.005	0.798	C	0.345 *	1.4%
		PM	0.684	B	0.684	B	0.000	0.890	D	0.206 *	0.0%

Notes:

"*" Indicates significant impact per Los Angeles County Department of Public Works "Traffic Impact Analysis Report Guidelines" criteria, January 1, 1997.

"n/a" Project results in "negative impact" (e.g., reduction in CMA value), therefore, it does not contribute to cumulative impacts.

As indicated in Table 4, the potential cumulative development in the study area is expected to result in substantial deterioration in the operations of a number of the study intersections, with several of the locations exhibiting LOS E (Canwood Street/Chesebro Road at Driver Avenue/Palo Comado Canyon Road during the PM School peak hour, and Palo Comado Canyon Road at US-101Freeway Westbound On/Off-Ramps during the Pre-PM peak hour) or LOS F (Palo Comado Canyon Road at US-101Freeway Westbound On/Off-Ramps during the PM School peak and PM peak hours) conditions. Table 4 also shows that the anticipated traffic increases from ongoing development in the study area would result in significant cumulative traffic impacts at all five of the study intersections during multiple periods throughout the day.

Measures to address the cumulative traffic impacts resulting from the additional related project trips are described in detail in the approved Crain & Associates traffic study, and in the Heschel School EIR. These cumulative improvements include a variety of options, including both signalized and unsignalized intersection improvement alternatives, for addressing the potential cumulative impacts. All of the proposed improvements are consistent with or compatible with long-range roadway system improvements identified by the City of Agoura Hills in their City's Master Plan transportation element.

As described earlier, the proposed Heschel School project will contribute incrementally to these cumulative traffic impacts. While the project-specific impacts of the proposed Heschel School Interim Student Carpool/Busing Program itself will be less than significant, and will not warrant or require any roadway improvements, the project will be responsible for "fair share" contributions toward the cumulative mitigation improvements, as discussed in detail in the approved project traffic study and project EIR. However, the Interim Student Carpool/Busing Program temporary limitation on the number of students to 390 results in a substantial decrease in the amount of project-related traffic within the cumulative conditions.

Table 4 also includes the previously-identified project-specific impacts at the study intersections, as well as a calculation of the project's incremental contributions to the total cumulative impacts. These incremental contributions are substantially reduced from those identified in the approved project analyses for the 750-student facility. Therefore, should any of the cumulative traffic mitigation improvements be constructed during the operations of the interim, 390-student occupancy of the Heschel School, or prior to implementation of the final intersection and roadway improvements required by the County related to the approved 750-student enrollment level, the "fair share" percentages shown in Table 4 should be used as the basis for School-related contributions to the costs of these long-term roadway improvements.

Special Events

The March 2007 supplemental interim Heschel School 390-student analysis also contained an analysis of potential weekend special events that may occur at the School. That analysis identified a limited-attendance special events scenario that would not result in any significant impacts to any of the study intersections or area neighborhood streets. As indicated in the preceding pages of this report, the proposed mid-block access results in the same or reduced impacts to all of the study intersections and neighborhood streets as compared to the "one-way loop" access scenario analyzed in the March 2007 study. Therefore, special events activities at the interim School, assuming the implementation of the proposed mid-block Palo Comado Canyon Road access, would continue to be less than significant, and as such, no additional analyses are warranted.

MITIGATION MEASURES

As indicated in this project traffic analysis, the proposed interim Heschel School project, including a limitation to a maximum of 390 students, implementation of an aggressive student carpool/busing program, and construction of a new mid-block access roadway to the site from Palo Comado Canyon Road, is not expected to result in significant traffic impacts at any of the nearby study intersections, nor will it create significant impacts to CMP arterial roadways, intersections, or freeway segments in the vicinity. Additionally, no significant impacts are anticipated to occur on any of the residential streets surrounding the project site. As a result, no off site traffic mitigation measures are warranted in connection with the operation of the interim 390-student Heschel School described in this report.

However, although no project-specific traffic impacts are anticipated, the proposed Heschel School will install a series of roadway improvements designed to provide sufficient access capacity to and from the project site at the new Palo Comado Canyon Road driveway location, as well as enhance local travel and overall traffic flows in and through the project vicinity. These roadway improvements are described below.

- Palo Comado Canyon Road Improvements – The School will Improve (widen) the south/west side Palo Comado Canyon Road between Canwood Street/Chesebro Road and the Northbound US-101 Freeway On-Ramp to complete a 32-foot half roadway, and will improve (widen) the north side of Palo Comado Canyon from Canwood Street to the proposed Heschel School driveway to a 32-foot half roadway. These additional roadway widths will accommodate the installation of an exclusive northbound right-turn only lane at the proposed project driveway location, in addition to the existing through lane, as well as the installation of a new southbound left-turn lane on Palo Comado Canyon Road at the site driveway, in addition to the existing through lane. These anticipated improvements are shown previously in Figure 3.

In addition to the widenings to Palo Comado Canyon Road and the implementation of the new left-turn and right-turn lanes described above, the project will also install the following traffic control improvements at the new Palo Comado Canyon Road/Heschel School driveway intersection, to provide adequate access capacity and operations into and out of the project site.

- Palo Comado Canyon Road and Project Driveway - The project will install a new two-phase traffic signal at this location. The signal should operate on an actuated basis on

the School access approaches (including both the new access roadway approach to Palo Comado Canyon Road and the new southbound left-turn lane on Palo Comado Canyon Road), operated so that through traffic on Palo Comado Canyon Road is not unnecessarily stopped or delayed when School traffic is not entering or exiting the site during peak School operation times.

Further, as described in the March 2007 study of the interim School (with "one-way loop" access scenario), the School will be required to implement a number of project-related traffic demand management strategies, including periodic monitoring of the number of inbound and outbound vehicles at the School during key time periods and provision of traffic monitoring and control personnel at the School entrance, to ensure that the proposed student carpool/busing program will adhere to the trip limits identified in this report, and will not produce significant traffic impacts to the surrounding area. Preliminary details of the anticipated interim School trip monitoring program are identified below.

Vehicle Trip Monitoring Program

Periodic trip monitoring will be included in the Heschel School Transportation management Program, to monitor compliance with the trip cap limits for each of the identified time periods, as summarized in Table B-1, to ensure that no traffic impacts from the School operations beyond those identified and mitigated by the recommended roadway improvements will occur. To this end, the Heschel School shall develop and administer a carpool/busing trip monitoring program that shall consist of the following elements:

- The County (or a designated traffic consultant) shall periodically conduct traffic counts at the entrance and exit of the School to evaluate whether the School is in compliance with the specified maximum allowable peak hour vehicle trips. The monitoring counts will identify both inbound and outbound vehicle traffic at the School gates, noting at a minimum the time of arrival and/or departure for each vehicles. The County shall select the count days without notice to the School;

- An annual school calendar shall be submitted to the County indicating holidays and special events;

- The County (or its designated traffic consultant) shall conduct monthly traffic counts of School-related vehicles at the project driveway(s) during each school year. Traffic count data from three consecutive mid-week days (Tuesday-Wednesday-Thursday) within weeks with no holidays will be evaluated each month;

- The traffic data obtained from the monitoring counts shall be compared to the maximum allowable number of allowable peak hour vehicle trips that can be generated by the School during each of the time periods specified in Table 1 of this report, including daily traffic generation, to evaluate compliance by the School with the allowable trip limits;

- The traffic counts and trip monitoring program will continue until all of the required project traffic impact mitigation measures (noted in the Conditional of Approval for Conditional Use Permit (CUP) 98-062, or other suitable alternative measures approved by the County based on this supplemental analysis) have been completed;

- A copy of all traffic counts and monitoring reports shall be sent to the Heschel School and to the City of Agoura Hills;

- If the reported traffic count exceeds the maximum allowable peak hour vehicle trips, a second three day traffic count shall be conducted within 30 days to verify the conditions. If this subsequent traffic count also exceeds the maximum allowable peak hour vehicle trips, the school shall have 30 days to submit a remediation plan to the Department of Regional Planning and the Department of Public Works for review and approval. Upon failure by the school to remediate, the Department of Regional Planning may impose such further remediation measures as are warranted by the situation, including, without limitation, fines, enrollment limitations, or other measures deemed appropriate;

- The County's cost of monitoring and reporting as well as the cost of the traffic counts including any equipment (if required) are the sole responsibility of the applicant; and

- A detailed transportation management program shall be submitted to the County for review and approval at least 30 calendar days prior to the start of each school year. The program shall include but not be limited to the number of faculty/staff and students (identified by grade level) for the upcoming semester, and an assessment of the anticipated School trip generation levels and associated carpool vehicle occupancy levels necessary to achieve consistency with the trip cap levels indicated previously in Table 1 in this report.

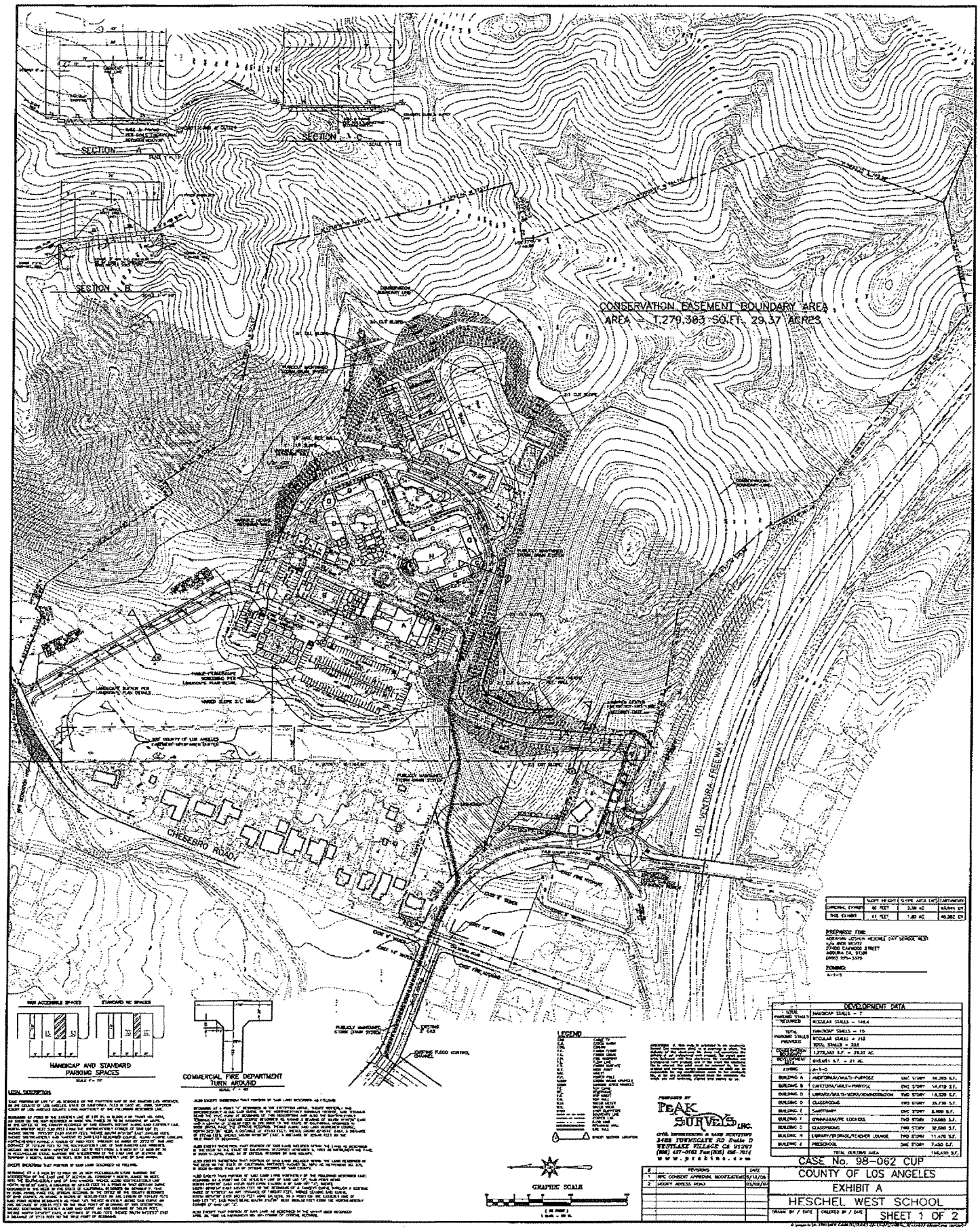
The trip monitoring program details have yet to be refined. However, whether School-related trip activity is counted via automated means, manual observations, or a combination of both methods, the operations of the School access locations will not be impeded in any way (e.g., vehicles will not be required to stop at the project gates in order to be counted). Therefore, the School trip monitoring program will not create delays for vehicles accessing the project site via

either the new southbound left-turn lane or the new northbound right-turn only lane. No vehicular queuing or back ups along either the northbound or southbound Palo Comado Canyon Road approaches to the new School access intersection will occur, and no secondary vehicle queuing on the Northbound US-101 Freeway Off-Ramp will result from either the normal operations of the School, or the mandatory trip monitoring program.

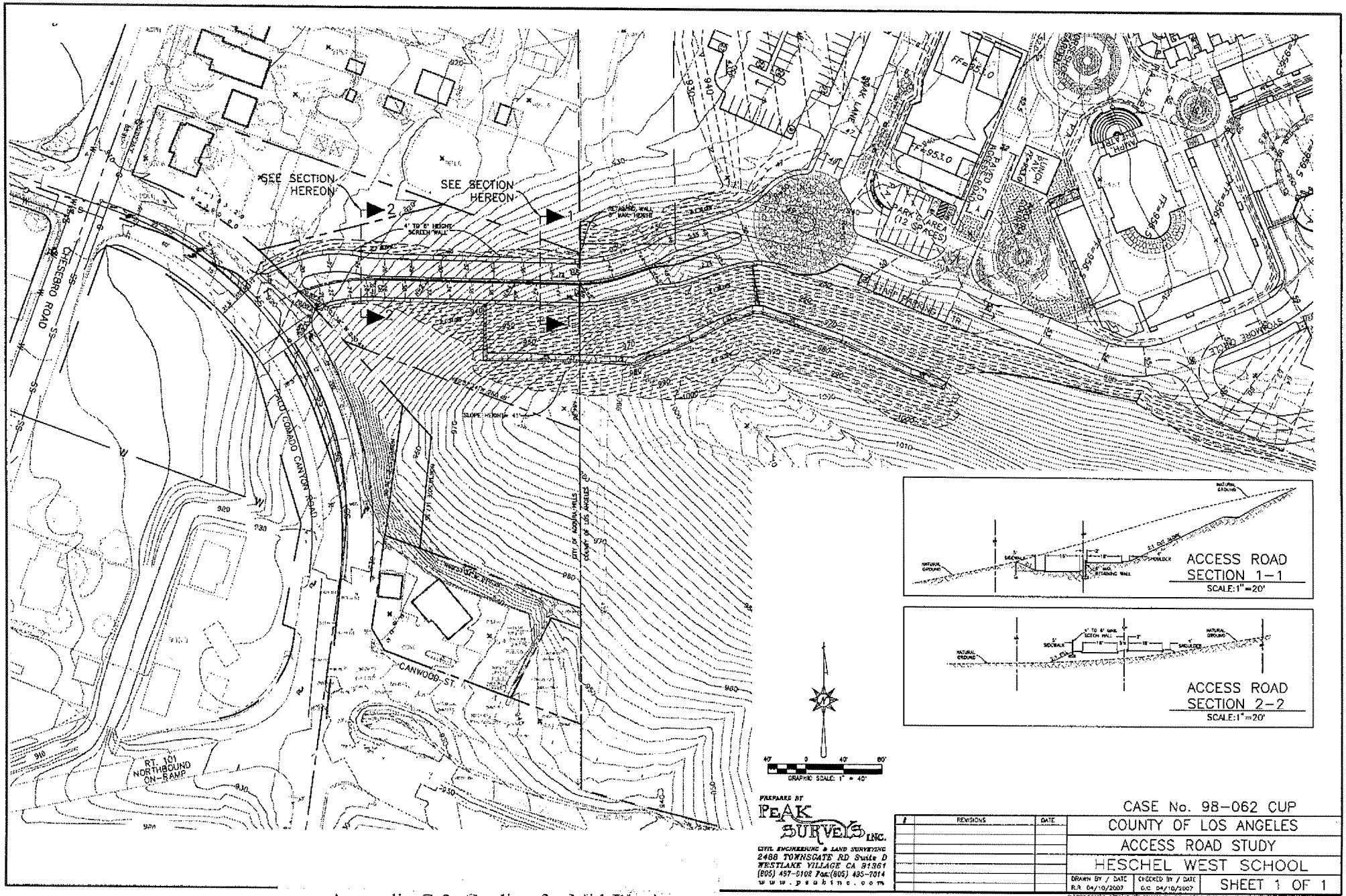
Finally, as described in the previous March 2007 traffic study, the School may provide a number of traffic control officers at critical site access locations and key intersections during larger weekend Special Event activities, to direct vehicles to and from the School site to reduce potential traffic delays during the peak arrival and/or departure periods. These traffic control officers may also be posted during the first day or two days of each School semester, to ensure that traffic to and from the School operates in a manner consistent with the proposed carpool/busing program, and to minimize any unforeseen traffic problems during the carpool/busing program "start up" period.

APPENDIX C

Modified Grading Concepts



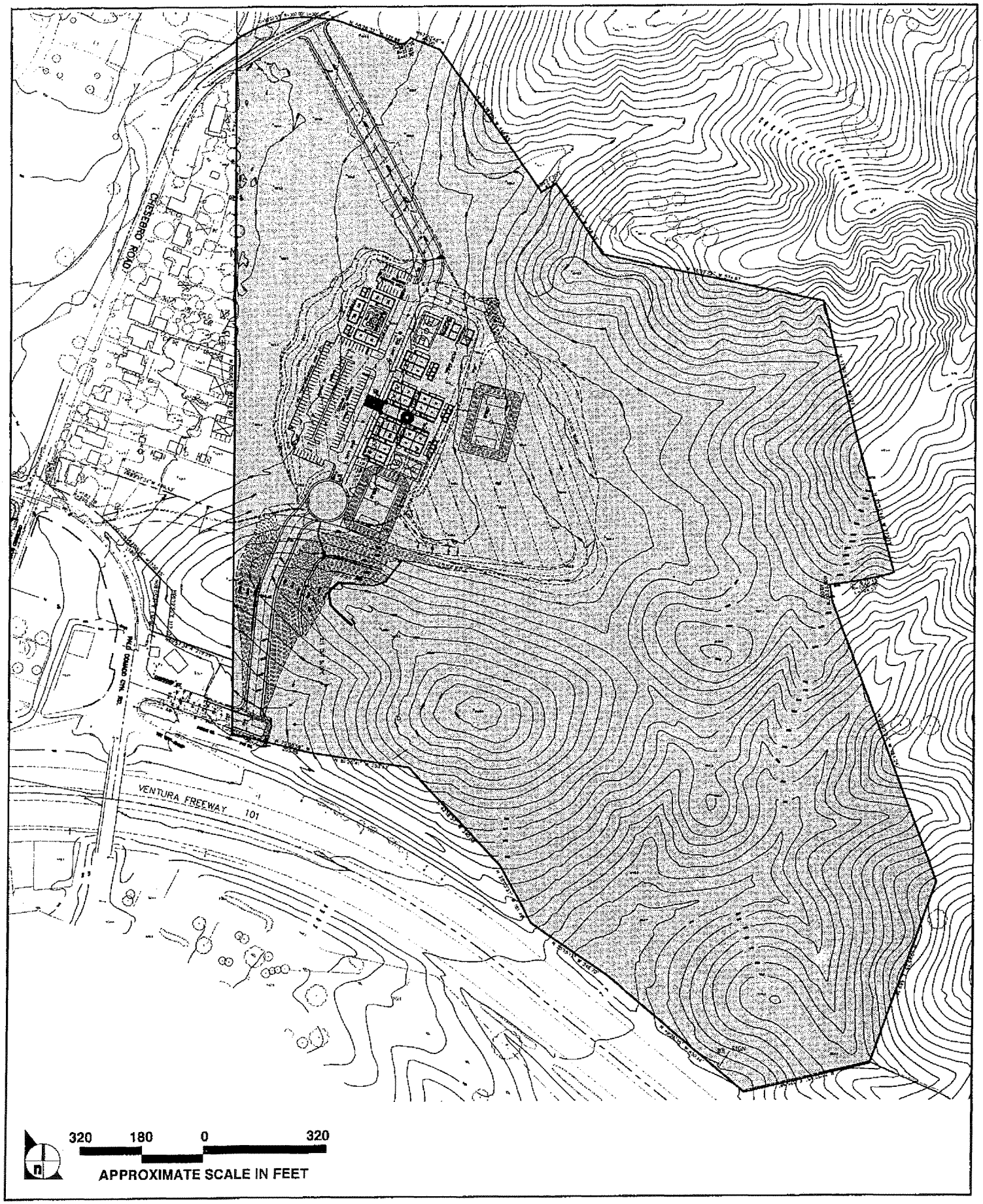
Appendix C-1: Grading for Canwood Access



Appendix C-2: Grading for Mid-Block Access

APPENDIX D

Site Plan for Proposed Interim School



SOURCE: Peak Surveys, Inc. – June 2003

Interim Site Plan

APPENDIX E

Average and Maximum Driving Distances between Residences and School

Proposed Interim School Carpool/Busing Program
Average and Maximum Driving Distances

Miles From School[1]	Number of Residences[1]
1	2
2	18
3	29
4	31
5	18
6	18
7	21
8	9
9	11
10	2
11	5
12	1
13	1
14	2

Total Residences	168
Average Driving Distance (miles)[2]	6.6
Maximum Driving Distance (miles)[3]	18.0
SCAB Home-to-Work Trip (miles)[4]	11.5

1. Source: Figure C-1, Heschel Day School (2006-07) Approximate Student Residential Location Map
2. Average Driving Distance is a weighted average distance of miles from the School x 1.25
3. Maximum Driving Distance is a weighted average distance of miles from the School greater than 10 miles times 1.5
4. Source: URBEMIS2002 Version 8.7.0

APPENDIX F

Calculations for Air Quality Analysis

Proposed Interim School Carpool/Busing Program
Daily Operational Emissions for 2010

Category		Units		VOC	NOx	CO	SOx	PM10
Faculty Staff Trips	Vehicle Class		LDA/LDT					
	One-Way Trips		142					
	One-Way Trip Length	miles	11.5					
	Emission Factor	g/mi		0.18	0.35	3.74	0.004	0.02
	Daily Emissions	lbs/day		0.67	1.26	13.47	0.016	0.06
Preschool Trips	Vehicle Class		LDA/LDT					
	One-Way Trips		208					
	One-Way Trip Length	miles	6.6					
	Emission Factor	g/mi		0.18	0.35	3.74	0.004	0.02
	Daily Emissions	lbs/day		0.56	1.06	11.32	0.013	0.05
Carpool Trips	Vehicle Class		LDA/LDT					
	One-Way Trips		64					
	One-Way Trip Length	miles	6.6					
	Emission Factor	g/mi		0.18	0.35	3.74	0.004	0.02
	Daily Emissions	lbs/day		0.17	0.33	3.48	0.004	0.02
School Bus Trips (20 student-bus)	Vehicle Class		SBUS					
	One-Way Trips		8					
	One-Way Trip Length	miles	18.0					
	Emission Factor	g/mi		0.71	11.09	8.32	0.014	0.40
	Daily Emissions	lbs/day		0.22	3.52	2.64	0.004	0.13
School Bus Trips (40 student-bus)	Vehicle Class		SBUS					
	One-Way Trips		24					
	One-Way Trip Length	miles	18.0					
	Emission Factor	g/mi		0.71	11.09	8.32	0.014	0.40
	Daily Emissions	lbs/day		0.67	10.56	7.92	0.013	0.38

Proposed Interim School Carpool/Busing Program
Los Angeles County: Simple Average Burden

Volatile Organic Compounds

		Light-Duty Autos	Light Duty Trucks 1	Light-Duty Trucks 2	Light-Duty Trucks	Light-Duty Autos and Trucks	School Bus
VMT	1000 mi/day	116525	15207	49797	65004	181529	199
VOC	tons/day	21.837	4.686	10.482	15.168	37.005	0.155
	g/mi	0.17	0.28	0.19	0.21	0.18	0.71

Nitrogen Dioxide

		Light-Duty Autos	Light Duty Trucks 1	Light-Duty Trucks 2	Light-Duty Trucks	Light-Duty Autos and Trucks	School Bus
VMT	1000 mi/day	116525	15207	49797	65004	181529	199
NOx	tons/day	35.081	7.220	27.577	34.797	69.878	2.432
	g/mi	0.27	0.43	0.50	0.49	0.35	11.09

Carbon Monoxide

		Light-Duty Autos	Light Duty Trucks 1	Light-Duty Trucks 2	Light-Duty Trucks	Light-Duty Autos and Trucks	School Bus
VMT	1000 mi/day	116525	15207	49797	65004	181529	199
CO	tons/day	427.728	89.269	231.586	320.855	748.583	1.825
	g/mi	3.33	5.33	4.22	4.48	3.74	8.32

Proposed Interim School Carpool/Busing Program
Los Angeles County: Simple Average Burden

Sulfur Dioxide

		Light-Duty Autos	Light Duty Trucks 1	Light-Duty Trucks 2	Light-Duty Trucks	Light-Duty Autos and Trucks	School Bus
VMT	1000 mi/day	116525	15207	49797	65004	181529	199
SO_x	tons/day	0.517	0.083	0.274	0.357	0.874	0.003
	g/mi	0.004	0.005	0.005	0.005	0.004	0.014

Particulate Matter

		Light-Duty Autos	Light Duty Trucks 1	Light-Duty Trucks 2	Light-Duty Trucks	Light-Duty Autos and Trucks	School Bus
VMT	1000 mi/day	116525	15207	49797	65004	181529	199
PM_{10}	tons/day	1.675	0.274	1.589	1.863	3.538	0.087
	g/mi	0.013	0.016	0.029	0.026	0.018	0.40

Proposed Interim School Carpool/Busing Program
Los Angeles County Emission Factors (by Vehicle Type)

LIGHT DUTY AUTO

LDA

CALYR	START MYR	END MYR	AIR BASIN	COUNTY	STARTS	POPULATION	VMT/1000	VEH TYPE	VEH TECH	POLLUTANT	PROCESS	EMISSIONS	BASIS
2010	1966	2010	County Average	Los Angeles County Av	137003	34488	557	LDA	NCAT	ROG	Total Ex	4.672	Day
2010	1966	2010	County Average	Los Angeles County Av	21617900	3424340	115800	LDA	CAT	ROG	Total Ex	17.128	Day
2010	1966	2010	County Average	Los Angeles County Av	41802	7832	168	LDA	DSL	ROG	Total Ex	0.037	Day
2010	1966	2010	County Average	Los Angeles County Av	137003	34488	557	LDA	NCAT	NOx	Total Ex	2.833	Day
2010	1966	2010	County Average	Los Angeles County Av	21617900	3424340	115800	LDA	CAT	NOx	Total Ex	31.979	Day
2010	1966	2010	County Average	Los Angeles County Av	41802	7832	168	LDA	DSL	NOx	Total Ex	0.269	Day
2010	1966	2010	County Average	Los Angeles County Av	137003	34488	557	LDA	NCAT	CO	Total Ex	50.604	Day
2010	1966	2010	County Average	Los Angeles County Av	21617900	3424340	115800	LDA	CAT	CO	Total Ex	376.958	Day
2010	1966	2010	County Average	Los Angeles County Av	41802	7832	168	LDA	DSL	CO	Total Ex	0.166	Day
2010	1966	2010	County Average	Los Angeles County Av	137003	34488	557	LDA	NCAT	SOx	Total Ex	0.004	Day
2010	1966	2010	County Average	Los Angeles County Av	21617900	3424340	115800	LDA	CAT	SOx	Total Ex	0.512	Day
2010	1966	2010	County Average	Los Angeles County Av	41802	7832	168	LDA	DSL	SOx	Total Ex	0.001	Day
2010	1966	2010	County Average	Los Angeles County Av	137003	34488	557	LDA	NCAT	PM	Total Ex	0.024	Day
2010	1966	2010	County Average	Los Angeles County Av	21617900	3424340	115800	LDA	CAT	PM	Total Ex	1.622	Day
2010	1966	2010	County Average	Los Angeles County Av	41802	7832	168	LDA	DSL	PM	Total Ex	0.029	Day

LIGHT DUTY TRUCK 1

LDT1

CALYR	START MYR	END MYR	AIR BASIN	COUNTY	STARTS	POPULATION	VMT/1000	VEH TYPE	VEH TECH	POLLUTANT	PROCESS	EMISSIONS	BASIS
2010	1966	2010	County Average	Los Angeles County Av	46210	11521	269	LDT1	NCAT	ROG	Total Ex	2.255	Day
2010	1966	2010	County Average	Los Angeles County Av	2571620	408544	14618	LDT1	CAT	ROG	Total Ex	2.399	Day
2010	1966	2010	County Average	Los Angeles County Av	62019	10168	320	LDT1	DSL	ROG	Total Ex	0.032	Day
2010	1966	2010	County Average	Los Angeles County Av	46210	11521	269	LDT1	NCAT	NOx	Total Ex	1.342	Day
2010	1966	2010	County Average	Los Angeles County Av	2571620	408544	14618	LDT1	CAT	NOx	Total Ex	5.354	Day
2010	1966	2010	County Average	Los Angeles County Av	62019	10168	320	LDT1	DSL	NOx	Total Ex	0.524	Day
2010	1966	2010	County Average	Los Angeles County Av	46210	11521	269	LDT1	NCAT	CO	Total Ex	24.215	Day
2010	1966	2010	County Average	Los Angeles County Av	2571620	408544	14618	LDT1	CAT	CO	Total Ex	64.82	Day
2010	1966	2010	County Average	Los Angeles County Av	62019	10168	320	LDT1	DSL	CO	Total Ex	0.234	Day
2010	1966	2010	County Average	Los Angeles County Av	46210	11521	269	LDT1	NCAT	SOx	Total Ex	0.002	Day
2010	1966	2010	County Average	Los Angeles County Av	2571620	408544	14618	LDT1	CAT	SOx	Total Ex	0.08	Day
2010	1966	2010	County Average	Los Angeles County Av	62019	10168	320	LDT1	DSL	SOx	Total Ex	0.001	Day
2010	1966	2010	County Average	Los Angeles County Av	46210	11521	269	LDT1	NCAT	PM	Total Ex	0.011	Day
2010	1966	2010	County Average	Los Angeles County Av	2571620	408544	14618	LDT1	CAT	PM	Total Ex	0.242	Day
2010	1966	2010	County Average	Los Angeles County Av	62019	10168	320	LDT1	DSL	PM	Total Ex	0.021	Day

LIGHT DUTY TRUCK 2

LDT2

CALYR	START MYR	END MYR	AIR BASIN	COUNTY	STARTS	POPULATION	VMT/1000	VEH TYPE	VEH TECH	POLLUTANT	PROCESS	EMISSIONS	BASIS
2010	1966	2010	County Average	Los Angeles County Av	31857	7842	185	LDT2	NCAT	ROG	Total Ex	1.518	Day
2010	1966	2010	County Average	Los Angeles County Av	8513720	1345110	49557	LDT2	CAT	ROG	Total Ex	8.956	Day
2010	1966	2010	County Average	Los Angeles County Av	10868	1864	55	LDT2	DSL	ROG	Total Ex	0.008	Day
2010	1966	2010	County Average	Los Angeles County Av	31857	7842	185	LDT2	NCAT	NOx	Total Ex	0.898	Day
2010	1966	2010	County Average	Los Angeles County Av	8513720	1345110	49557	LDT2	CAT	NOx	Total Ex	26.591	Day
2010	1966	2010	County Average	Los Angeles County Av	10868	1864	55	LDT2	DSL	NOx	Total Ex	0.088	Day
2010	1966	2010	County Average	Los Angeles County Av	31857	7842	185	LDT2	NCAT	CO	Total Ex	16.178	Day
2010	1966	2010	County Average	Los Angeles County Av	8513720	1345110	49557	LDT2	CAT	CO	Total Ex	215.36	Day
2010	1966	2010	County Average	Los Angeles County Av	10868	1864	55	LDT2	DSL	CO	Total Ex	0.048	Day
2010	1966	2010	County Average	Los Angeles County Av	31857	7842	185	LDT2	NCAT	SOx	Total Ex	0.001	Day
2010	1966	2010	County Average	Los Angeles County Av	8513720	1345110	49557	LDT2	CAT	SOx	Total Ex	0.273	Day
2010	1966	2010	County Average	Los Angeles County Av	10868	1864	55	LDT2	DSL	SOx	Total Ex	0	Day
2010	1966	2010	County Average	Los Angeles County Av	31857	7842	185	LDT2	NCAT	PM	Total Ex	0.008	Day
2010	1966	2010	County Average	Los Angeles County Av	8513720	1345110	49557	LDT2	CAT	PM	Total Ex	1.575	Day
2010	1966	2010	County Average	Los Angeles County Av	10868	1864	55	LDT2	DSL	PM	Total Ex	0.006	Day

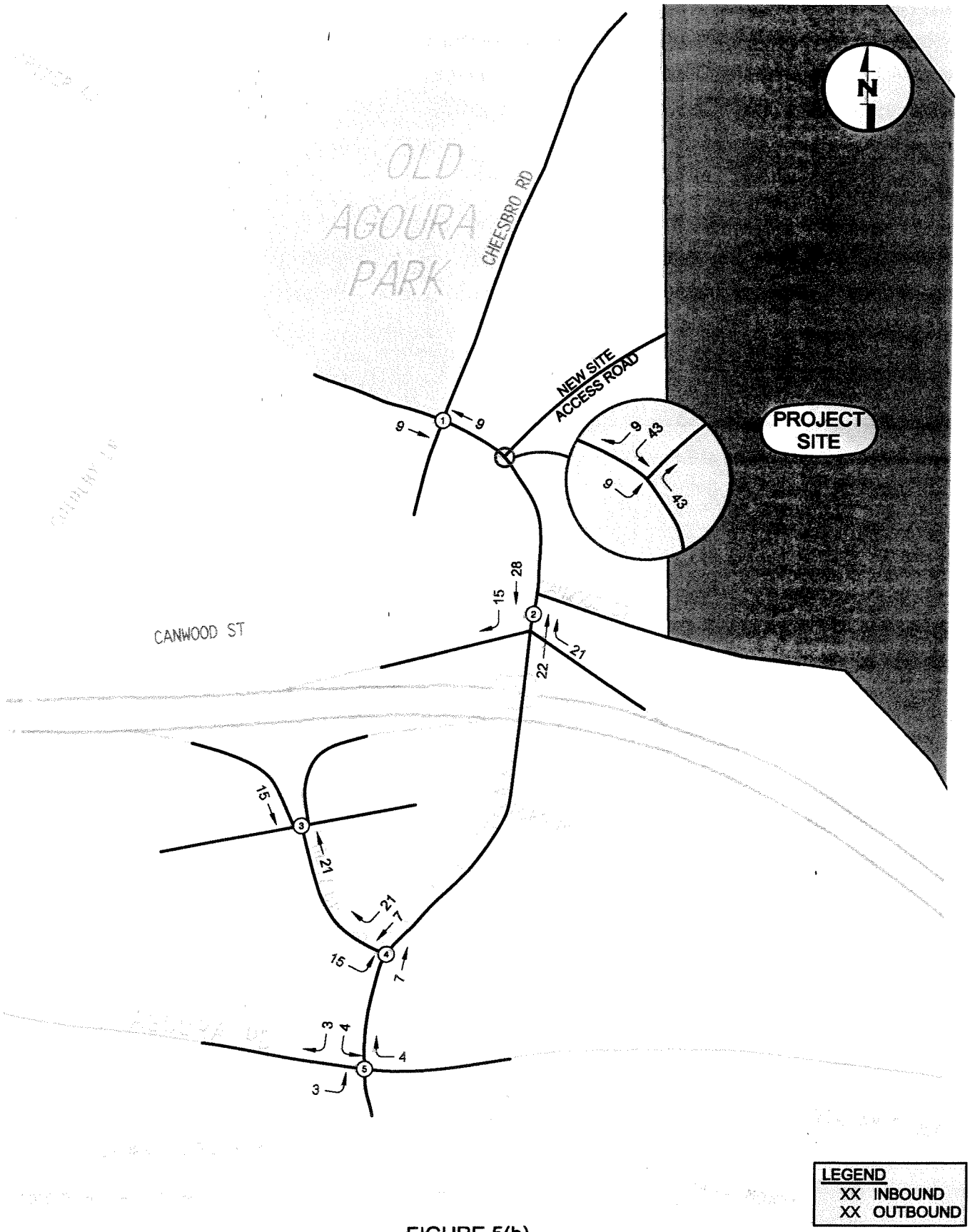


FIGURE 5(b)

HESCHEL SCHOOL INTERIM 390 STUDENT PROJECT
TOTAL NEW SCHOOL TRIPS
POST-AM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

5/9/2007

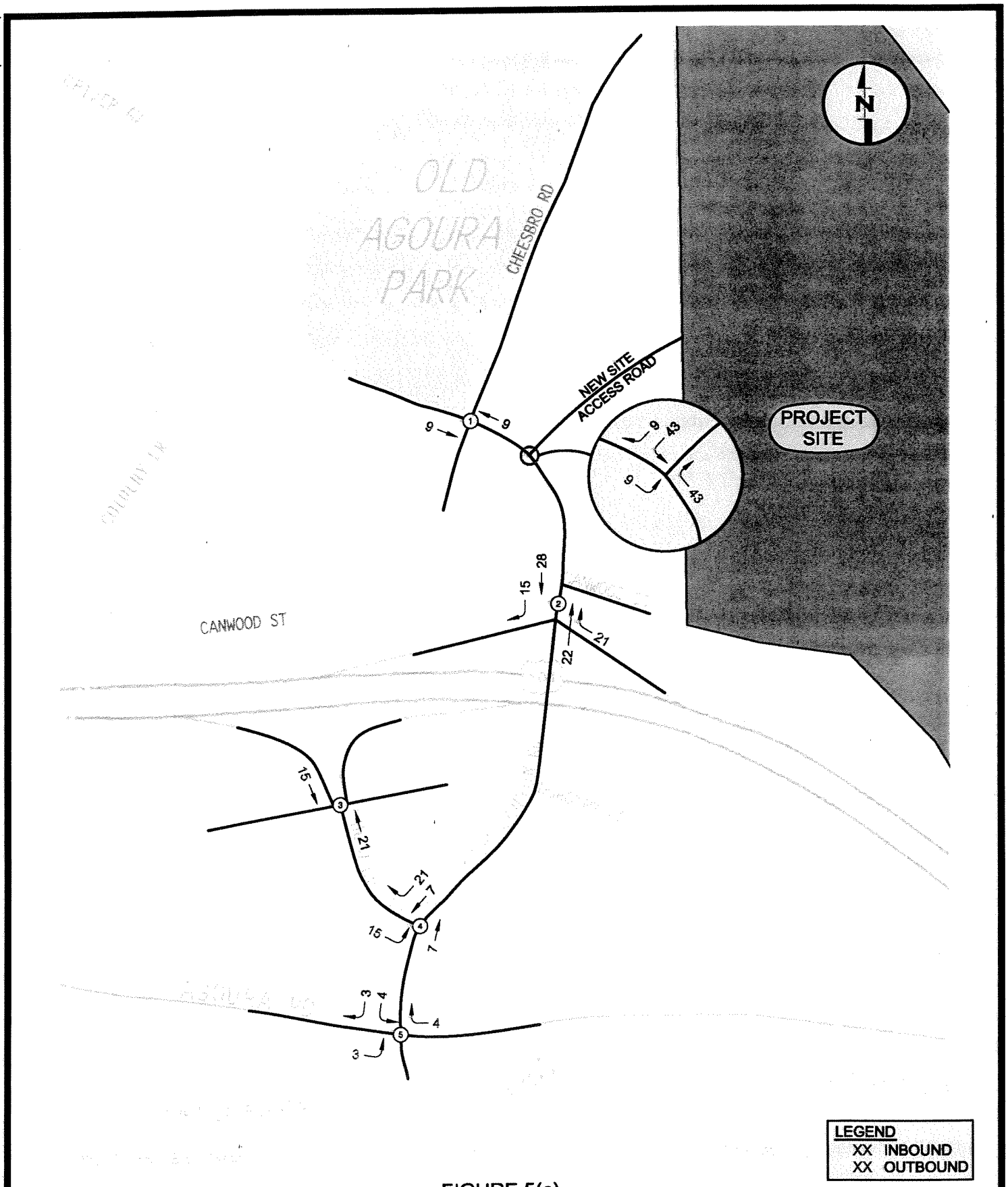


FIGURE 5(c)

HESCHEL SCHOOL INTERIM 390 STUDENT PROJECT
TOTAL NEW SCHOOL TRIPS
PRE-PM SCHOOL PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

5/9/2007

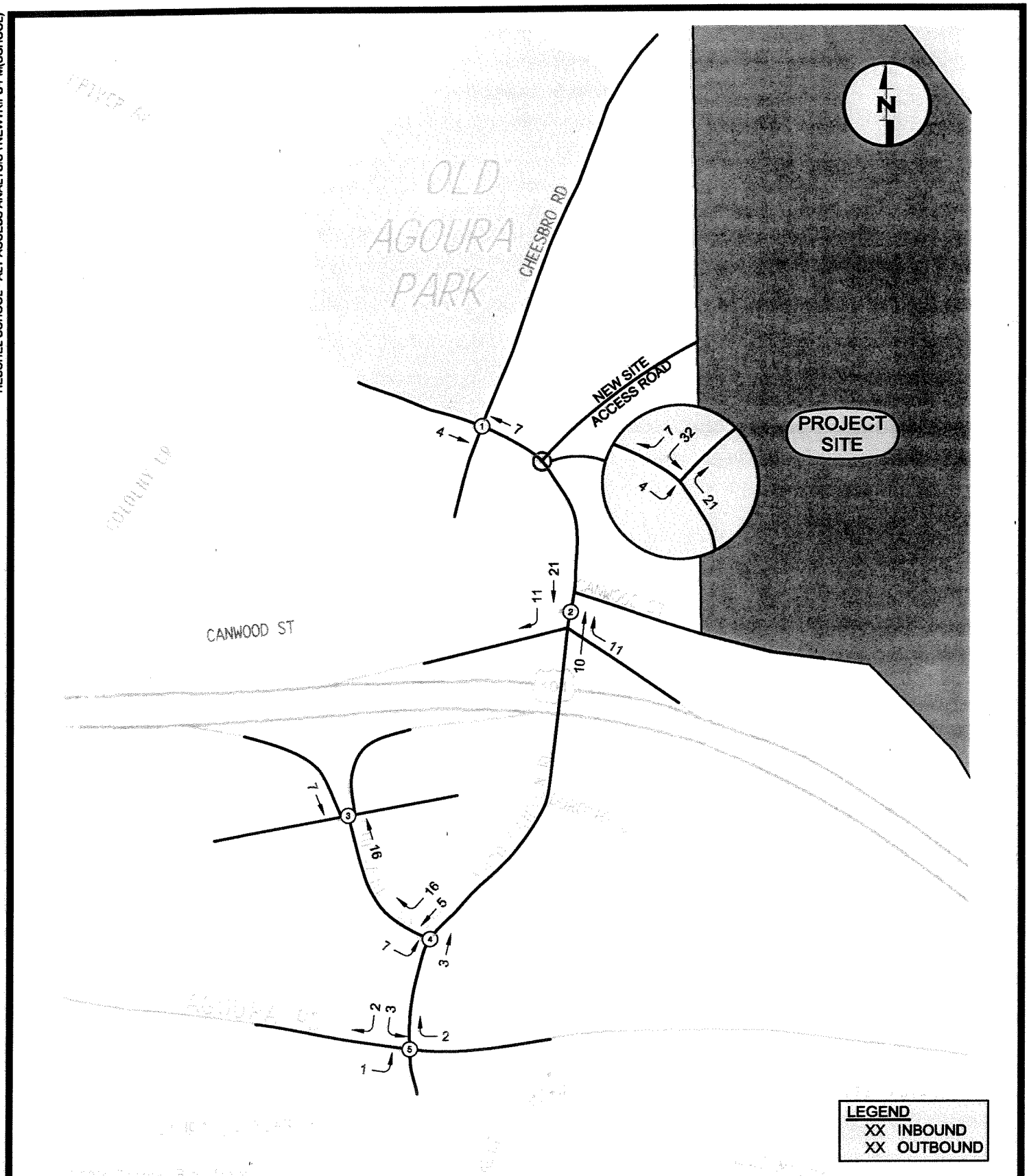


FIGURE 5(d)

HESCHEL SCHOOL INTERIM 390 STUDENT PROJECT
TOTAL NEW SCHOOL TRIPS
SCHOOL PM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

5/9/2007

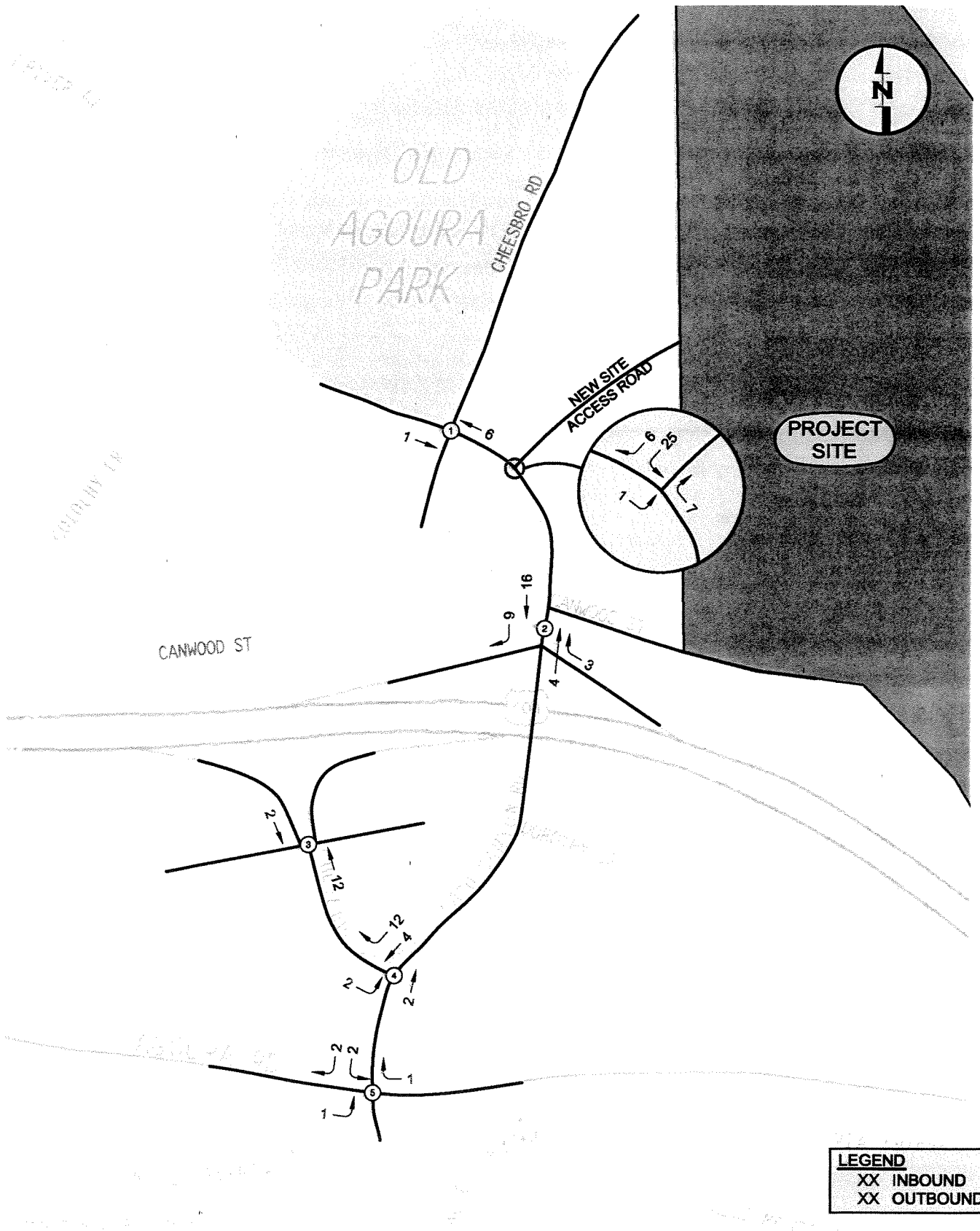


FIGURE 5(e)

HESCHEL SCHOOL INTERIM 390 STUDENT PROJECT
TOTAL NEW SCHOOL TRIPS
PRE-PM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

5/9/2007

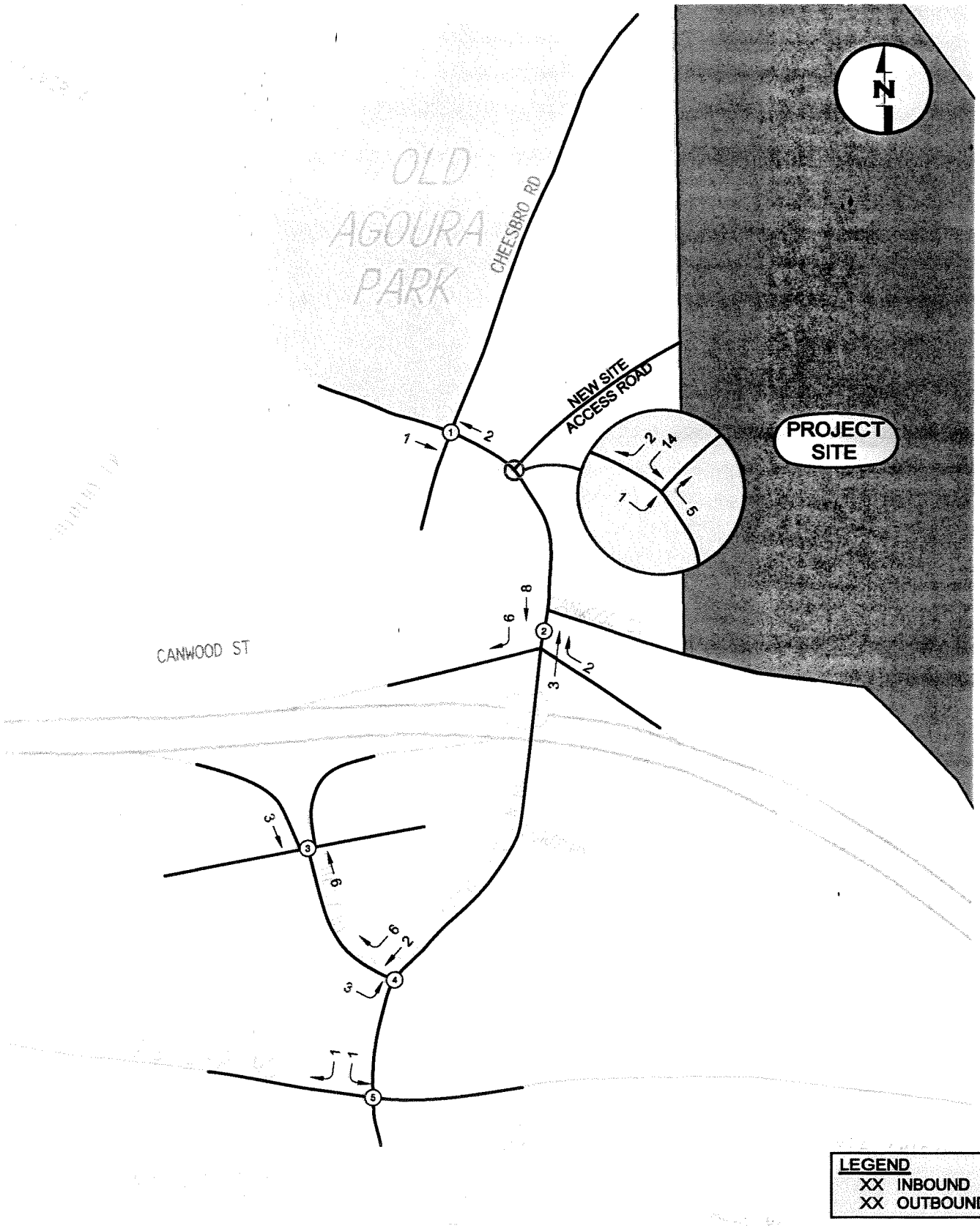


FIGURE 5(f)

HESCHEL SCHOOL INTERIM 390 STUDENT PROJECT
TOTAL NEW SCHOOL TRIPS
PM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

5/9/2007

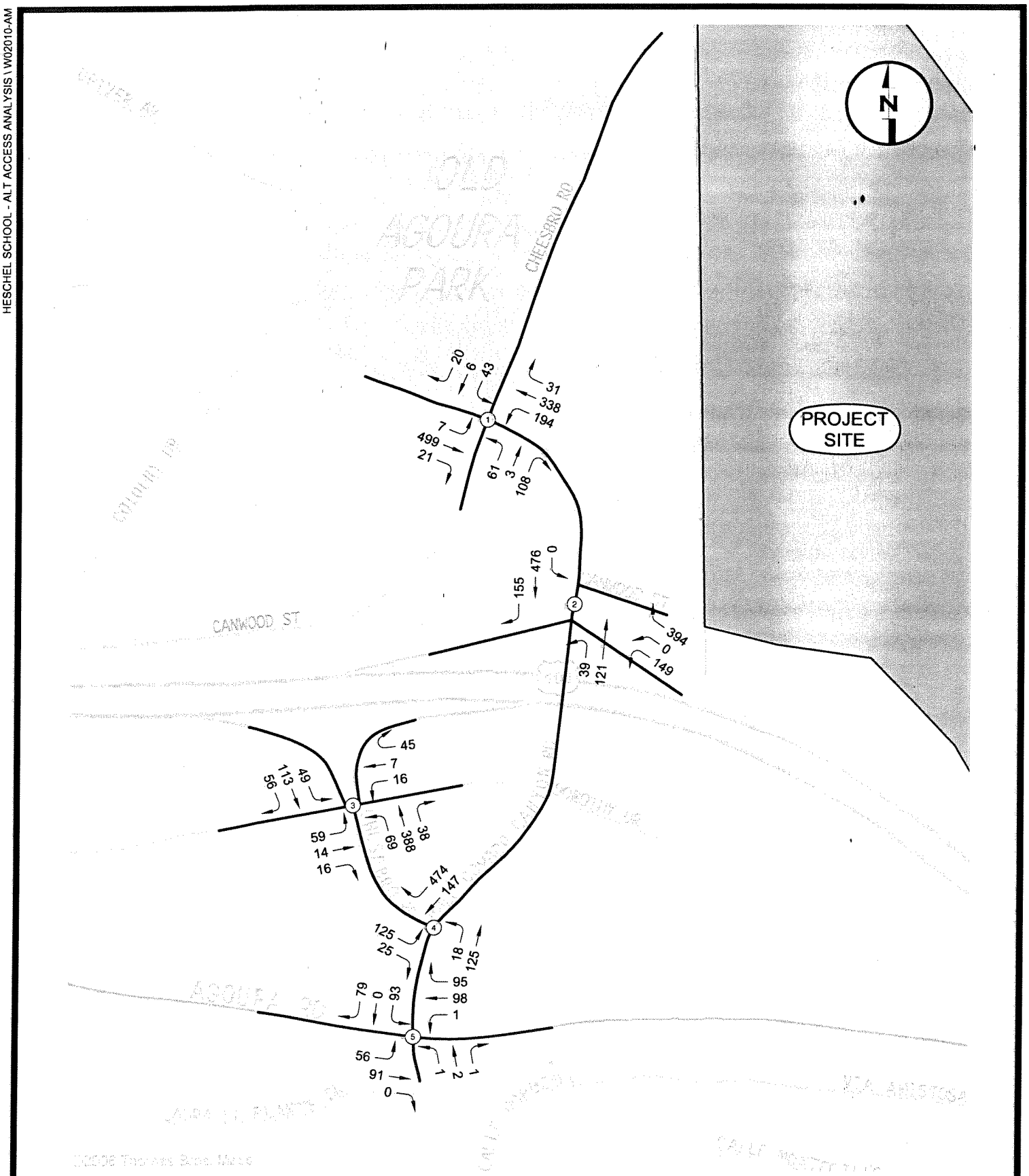


FIGURE 6(a)

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT PROJECT
(AMBIENT GROWTH ONLY)
AM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

5/9/2007

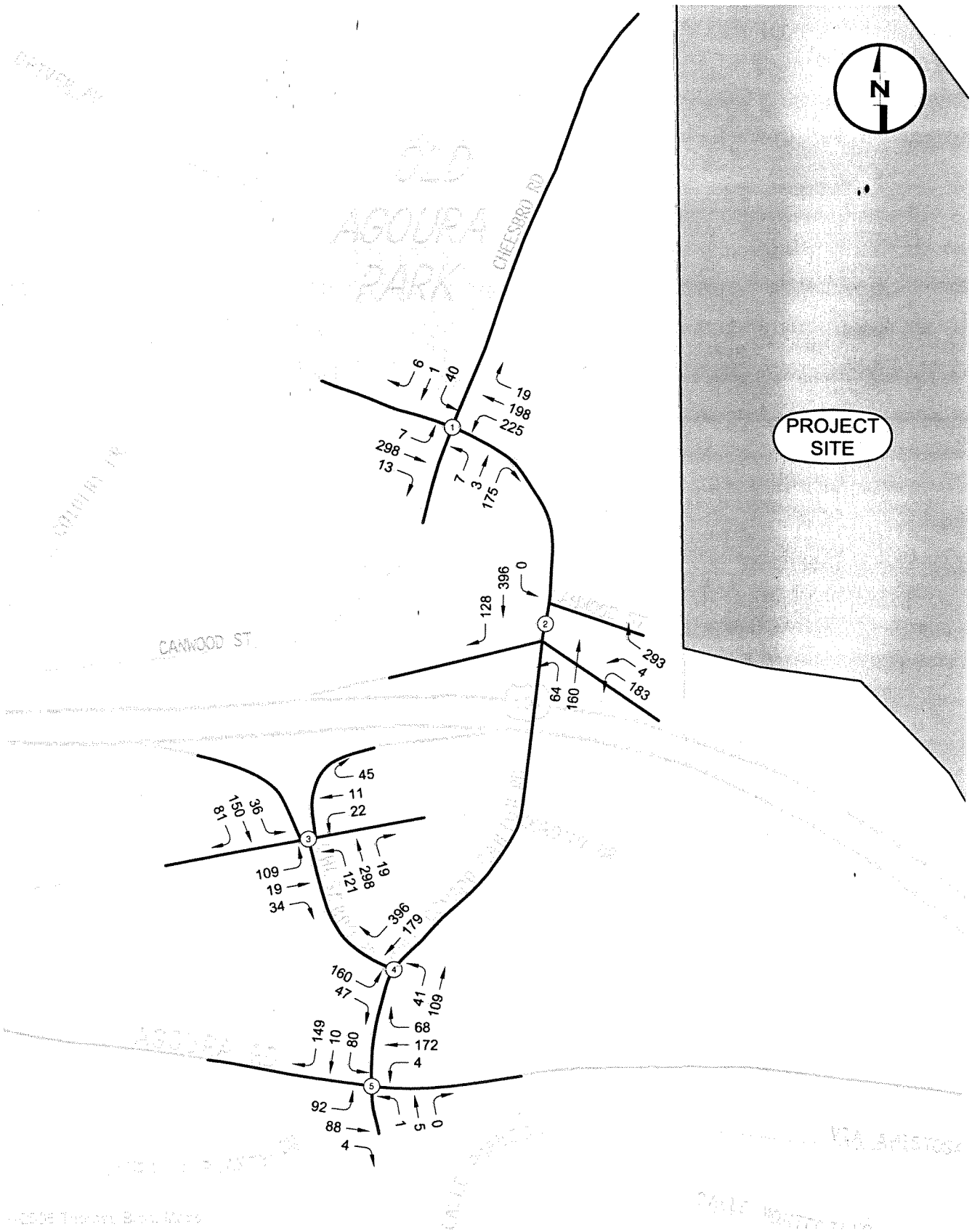


FIGURE 6(b)

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT PROJECT
(AMBIENT GROWTH ONLY)
POST-AM PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

5/9/2007

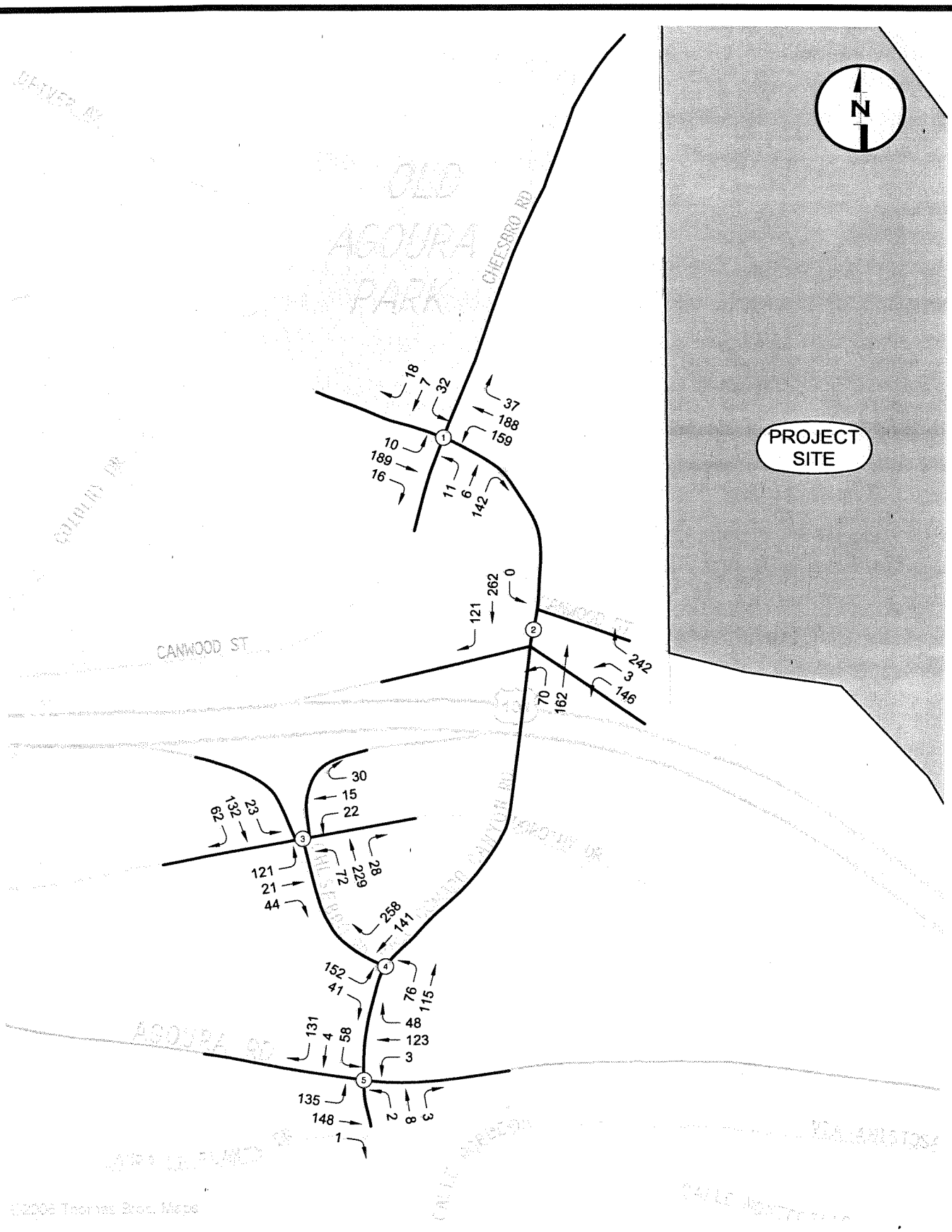


FIGURE 6(c)

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT PROJECT
(AMBIENT GROWTH ONLY)
PRE-PM SCHOOL PEAK HOUR

HIRSCH GREEN
Hirsch/Green Transportation Consulting, Inc.

5/9/2007

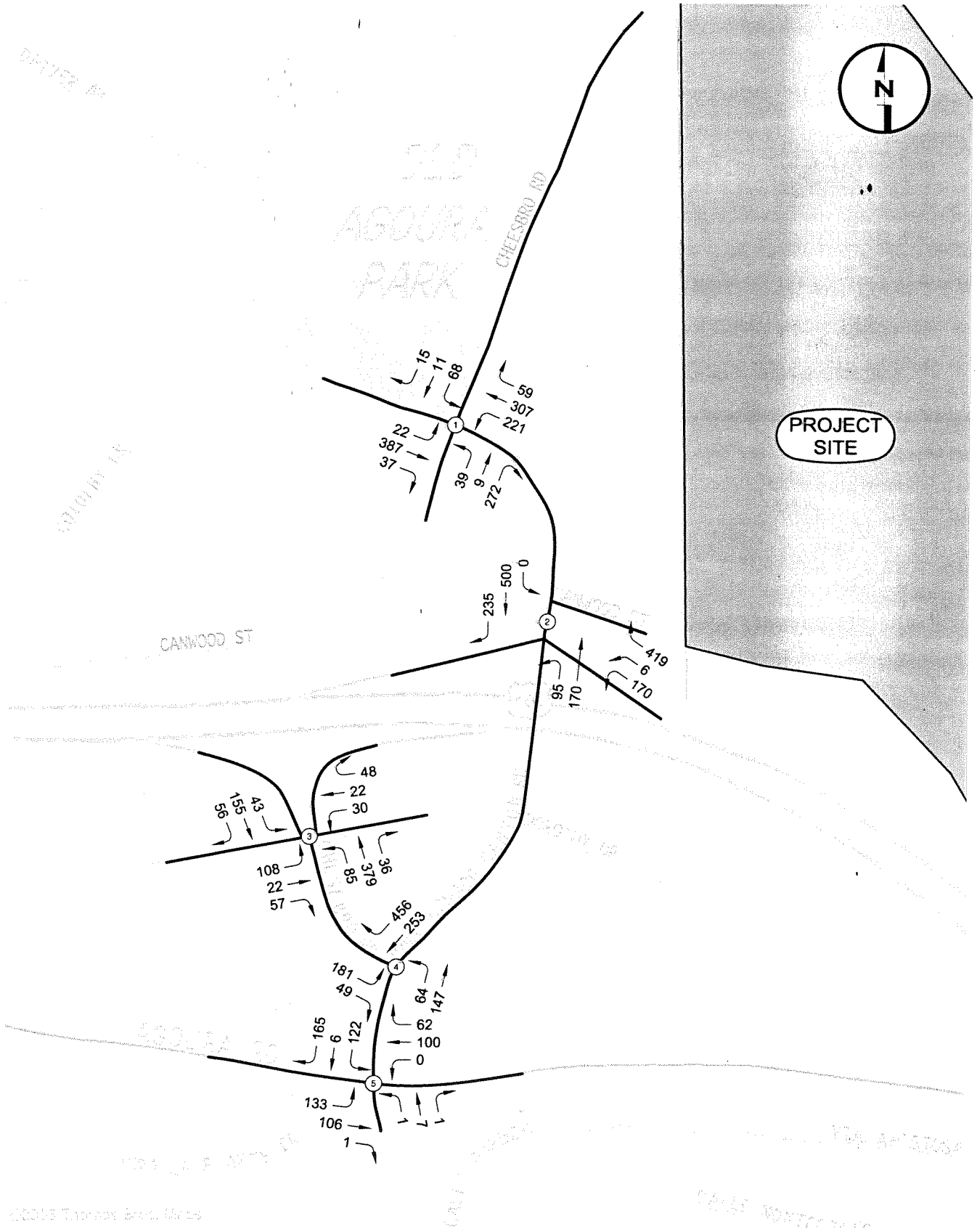


FIGURE 6(d)

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT PROJECT
(AMBIENT GROWTH ONLY)
SCHOOL PM PEAK HOUR

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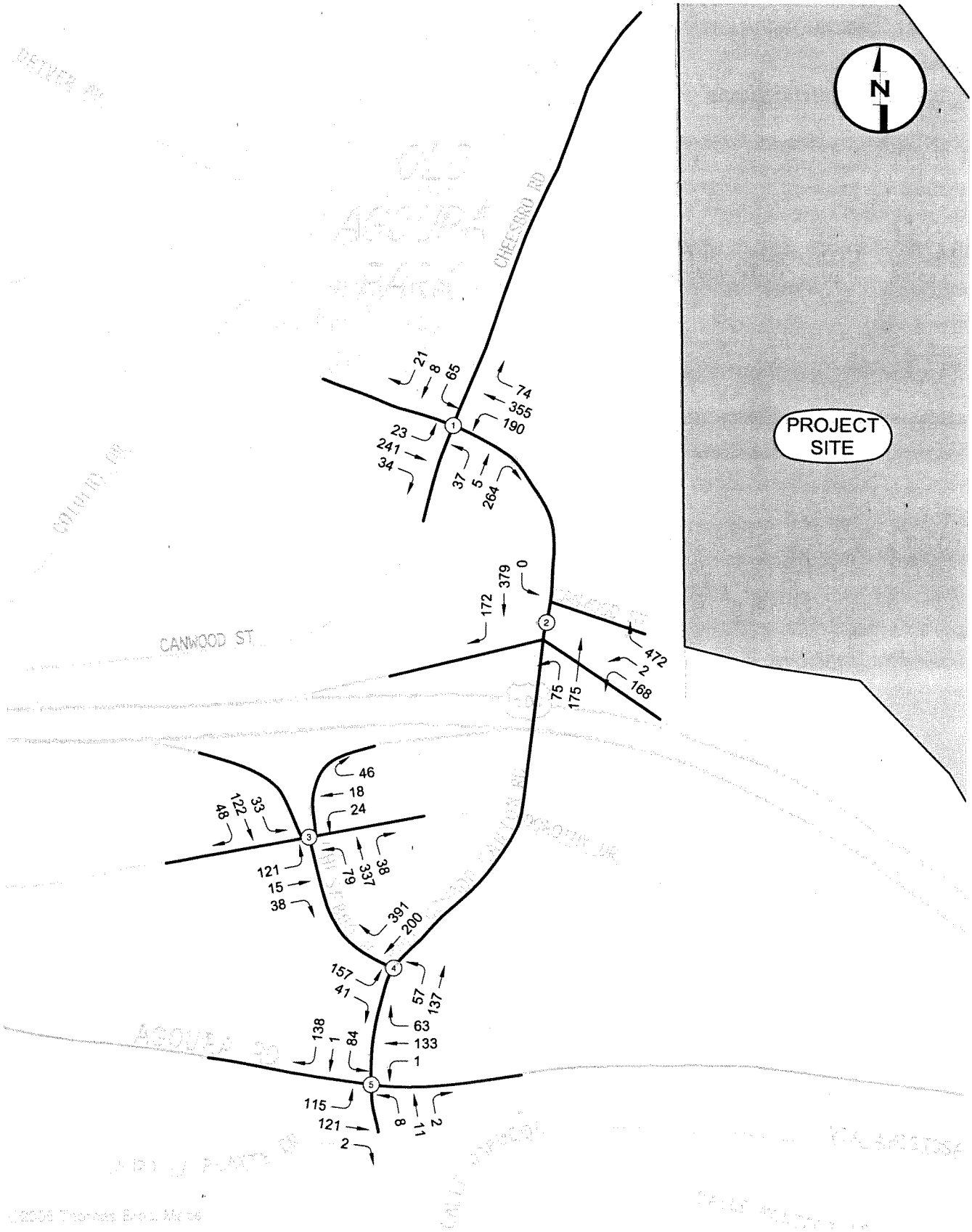

FIGURE 6(e)

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT PROJECT
(AMBIENT GROWTH ONLY)
PRE-PM PEAK HOUR

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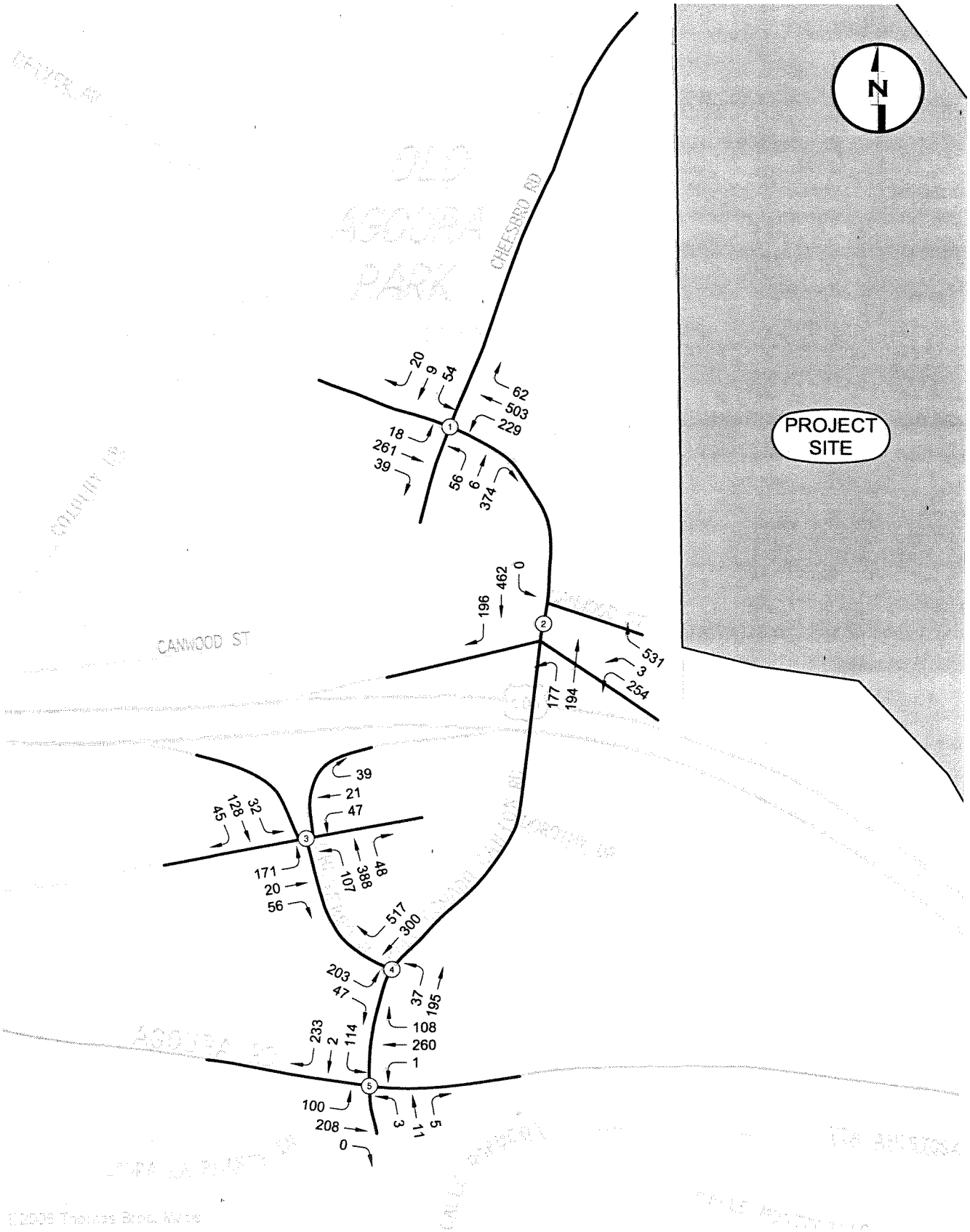

FIGURE 6(f)

FUTURE (2010) TRAFFIC VOLUMES
WITHOUT PROJECT
(AMBIENT GROWTH ONLY)
PM PEAK HOUR

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As detailed in the previous project traffic studies, the Los Angeles County Department of Public Works requires a two-step process in the evaluation of future conditions and the assessment of potential project impacts. First, project-specific impacts on the future conditions are identified by using only the ambient growth traffic increases as the baseline, thereby isolating potential project traffic impacts from those of the cumulative development project is the study area. This step identifies project-specific impacts, and allows for the identification of project-specific mitigation measures, as necessary, at the study intersections.

Next, the cumulative traffic impacts of all development in the area, including the project itself, are evaluated to determine the ultimate traffic conditions in the future. This step allows for the identification of potential long-term roadway improvements that may be necessary to mitigate total anticipated traffic growth in the study area, but are beyond the scope of any particular development to implement. Project "fair share" contributions to any such cumulative improvements are also identified.

Analysis of Project-Specific Impacts

The incremental traffic impacts of the proposed "mid-block" access and interim School operations (390-student) scenario were evaluated at each of the study intersections during each of the six analysis periods identified previously. To estimate the future area traffic conditions following development and occupancy of the interim School, the net project trips shown previously in Figures 5(a) through 5(f) were added to the "Future (2010) Without Project" baseline traffic volumes shown in Figures 6(a) through 6(f) to produce the anticipated "Future (2010) With Interim School and Mid-Block Access" conditions at the study intersections. The resulting traffic volumes at the study intersections are shown in Figure 7(a) for the AM peak hour, Figure 7(b) for the Post-AM peak hour, Figure 7(c) for the Pre-PM School peak hour, Figure 7(d) for the PM School peak hour, Figure 7(e) for the Pre-PM peak hour, and Figure 7(f) for the PM peak hour periods.

Note that, as described earlier, the occupancy of the new School site will include the incorporation of existing students from the current Heschel School site near Liberty Canyon Road and their associated trips, which are intrinsically included in the new project trip generation estimates shown in Table 1. Therefore, so as not to "double count" these student-related trips and overestimate the number on "net new" trips resulting from the future School activity, these existing student trips were subtracted from the future conditions for the AM peak hour, PM School peak hour, and PM peak hour conditions. However, no "existing" student trip

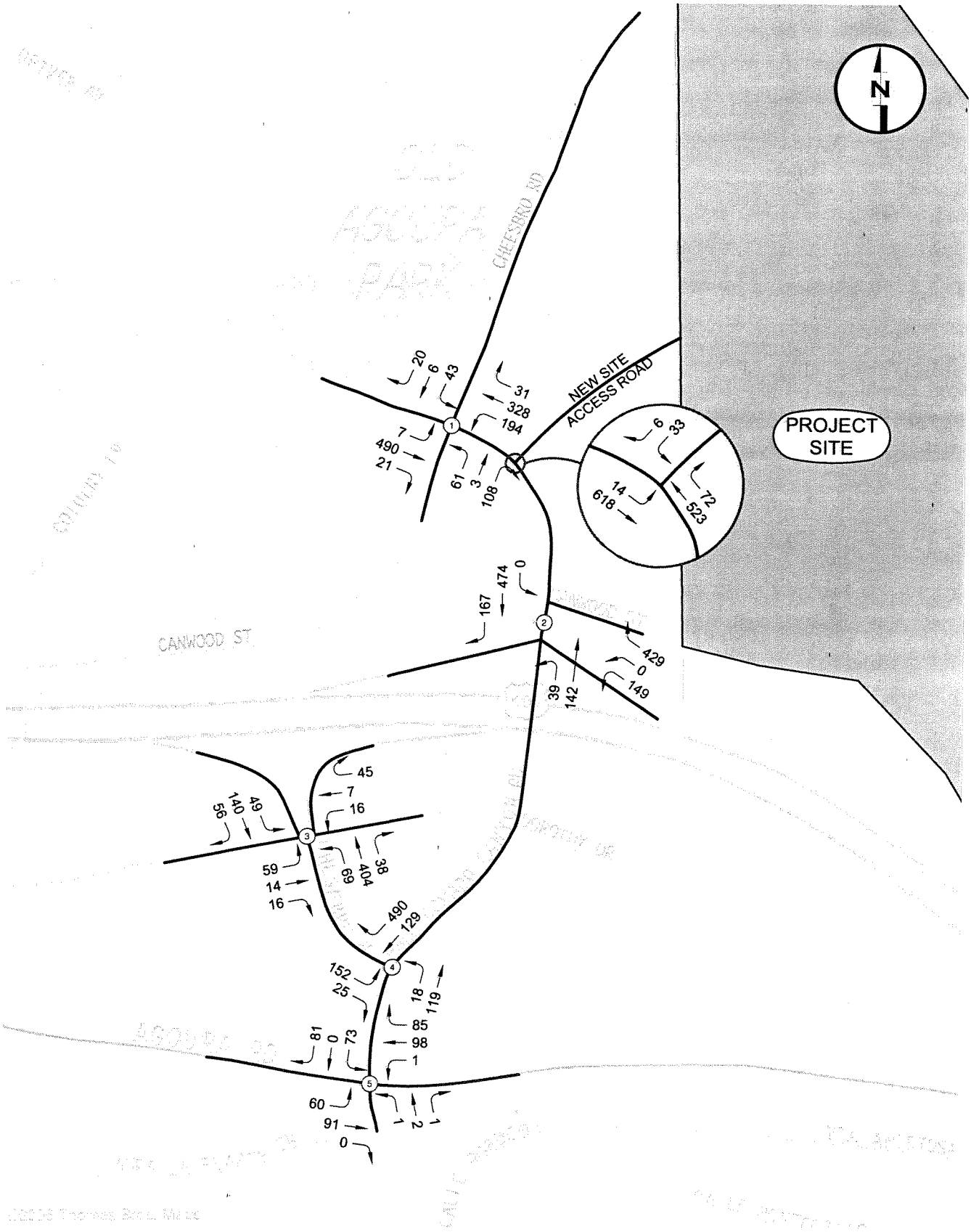

FIGURE 7(a)

FUTURE (2010) TRAFFIC VOLUMES
WITH INTERIM 390 STUDENT PROJECT
(INCLUDING REMOVAL OF EXISTING SCHOOL TRIPS)
AM PEAK HOUR

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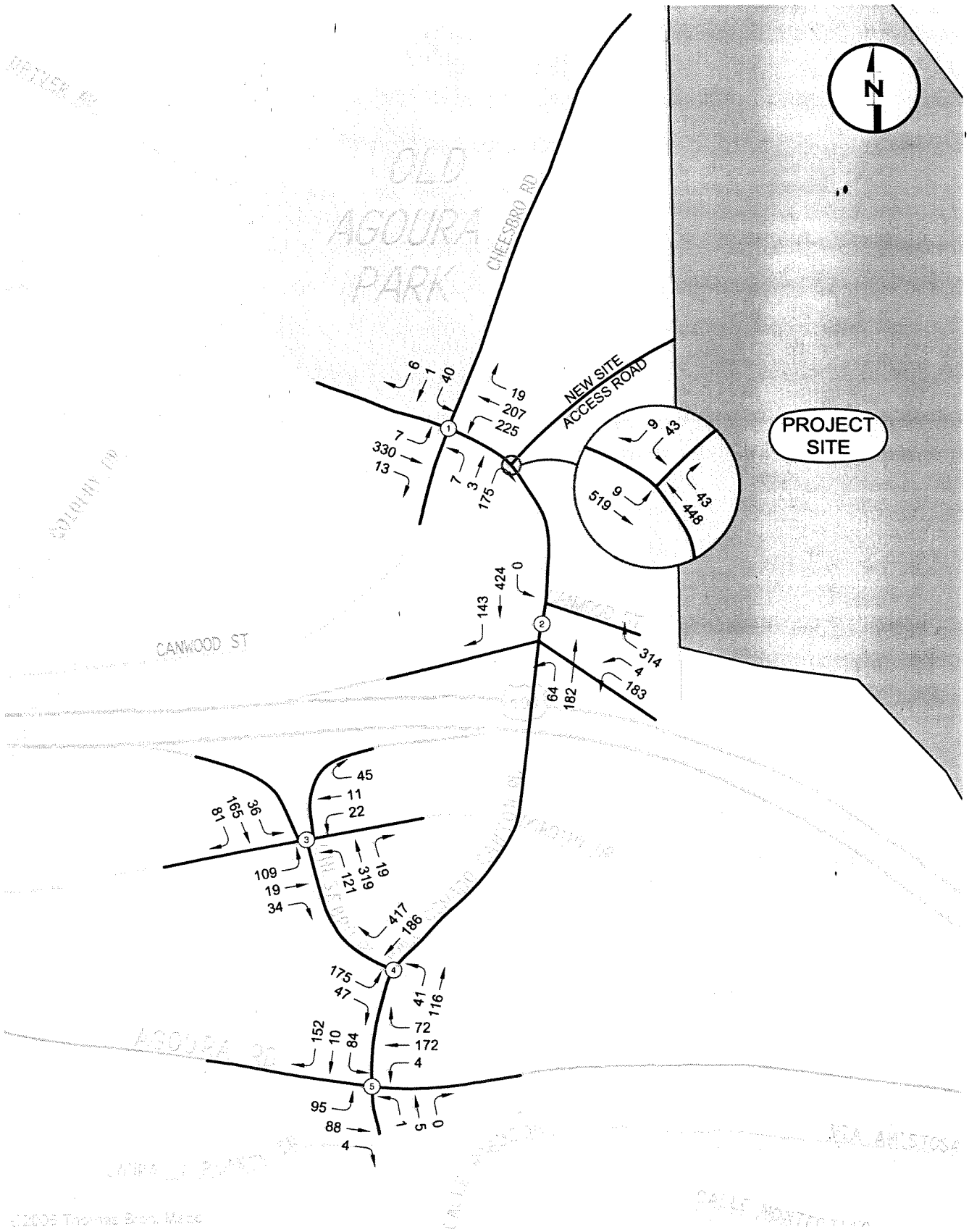

FIGURE 7(b)

FUTURE (2010) TRAFFIC VOLUMES
WITH INTERIM 390 STUDENT PROJECT
POST-AM PEAK HOUR

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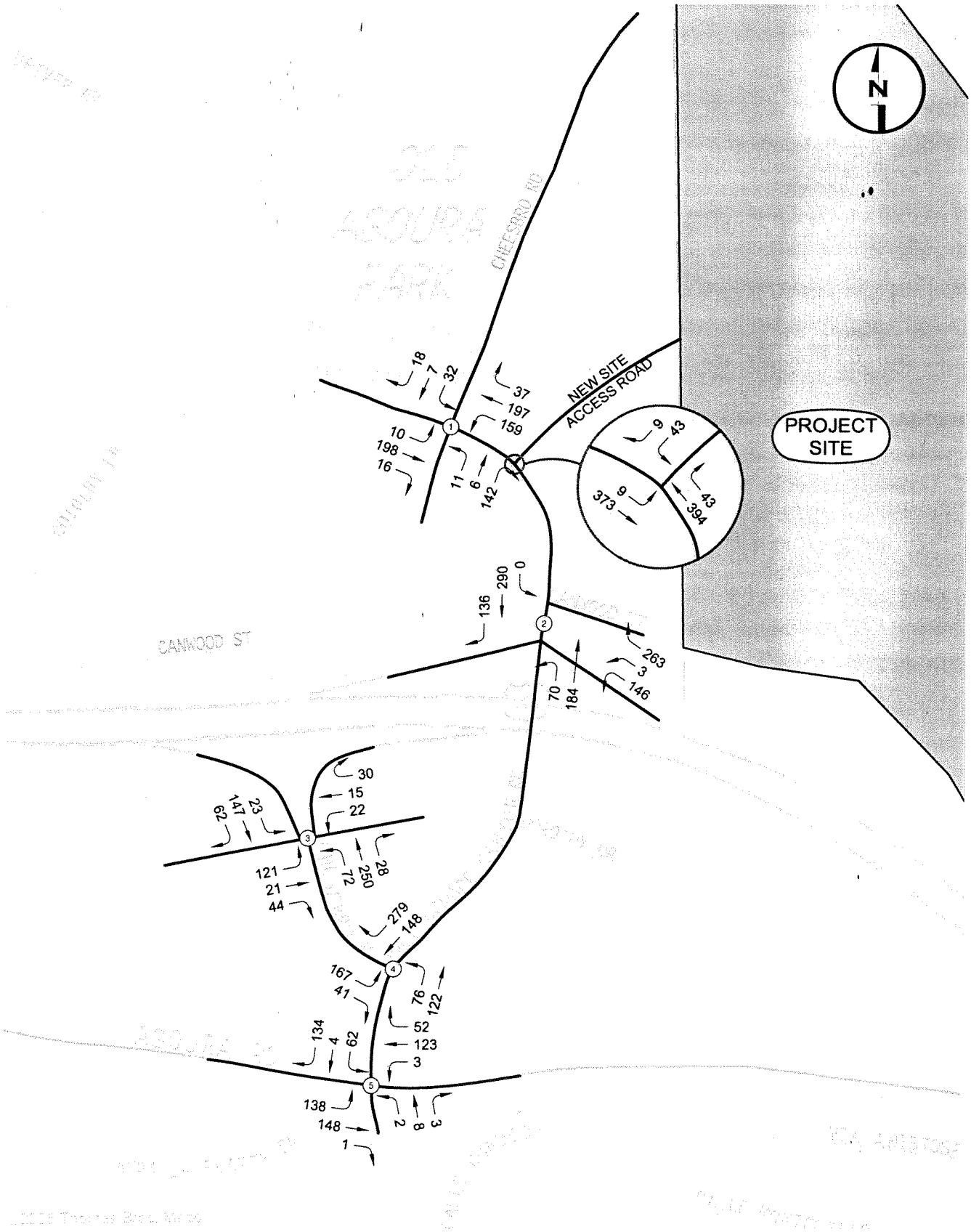

FIGURE 7(c)

FUTURE (2010) TRAFFIC VOLUMES
WITH INTERIM 390 STUDENT PROJECT
PRE-PM SCHOOL PEAK HOUR

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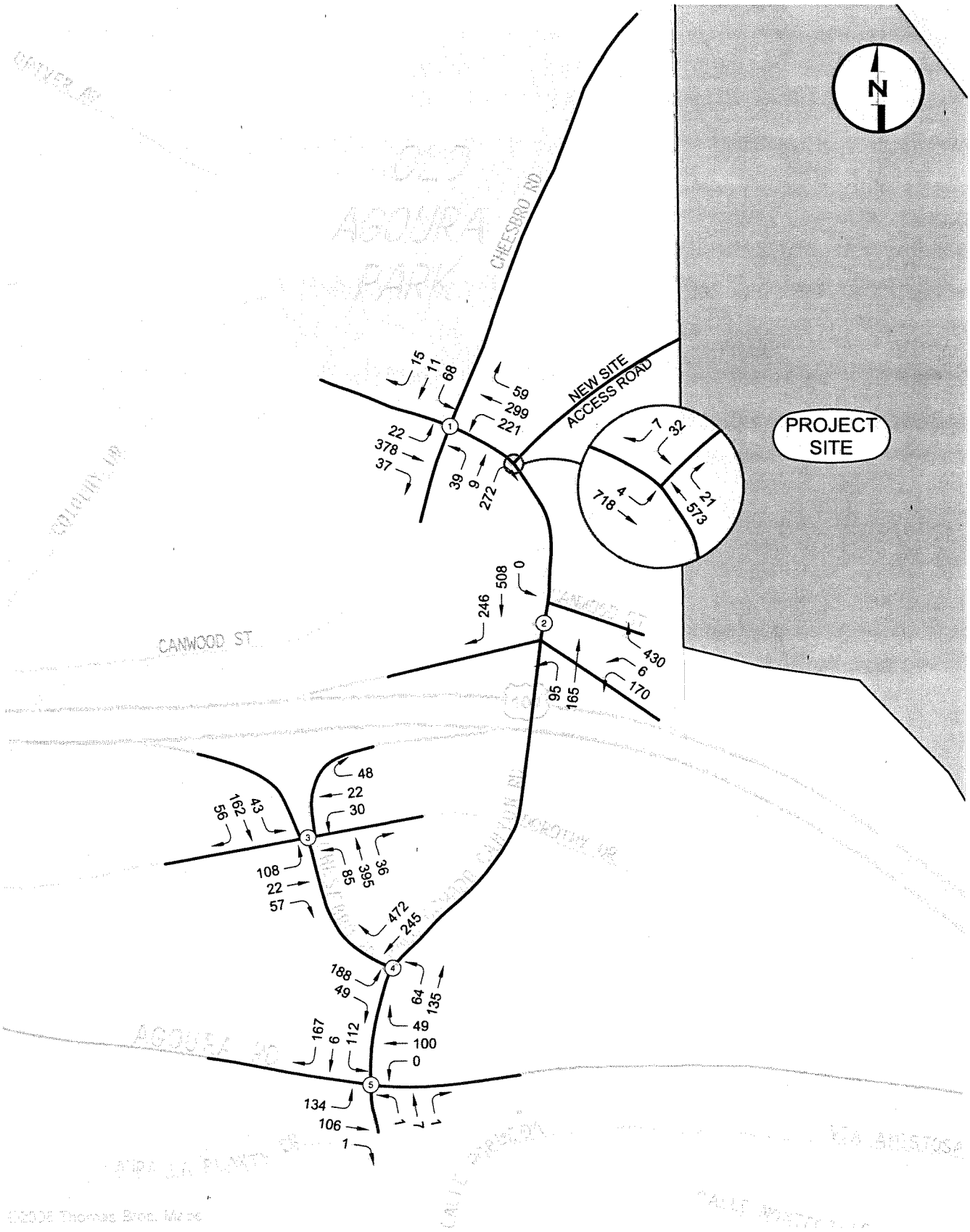

FIGURE 7(d)

FUTURE (2010) TRAFFIC VOLUMES
WITH INTERIM 390 STUDENT PROJECT
(INCLUDING REMOVAL OF EXISTING SCHOOL TRIPS)
SCHOOL PM PEAK HOUR

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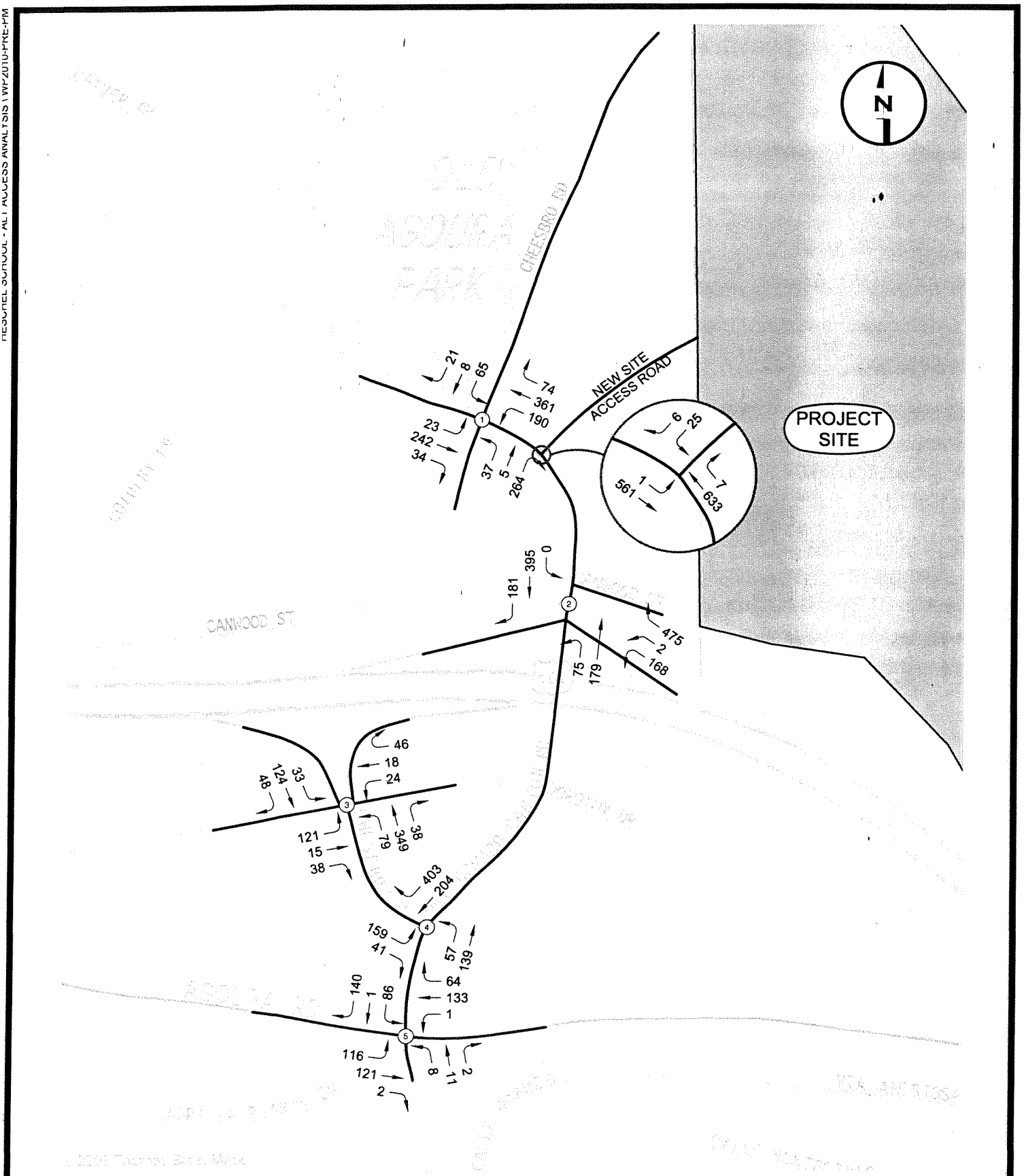

FIGURE 7(e)

FUTURE (2010) TRAFFIC VOLUMES
WITH INTERIM 390 STUDENT PROJECT
PRE-PM PEAK HOUR

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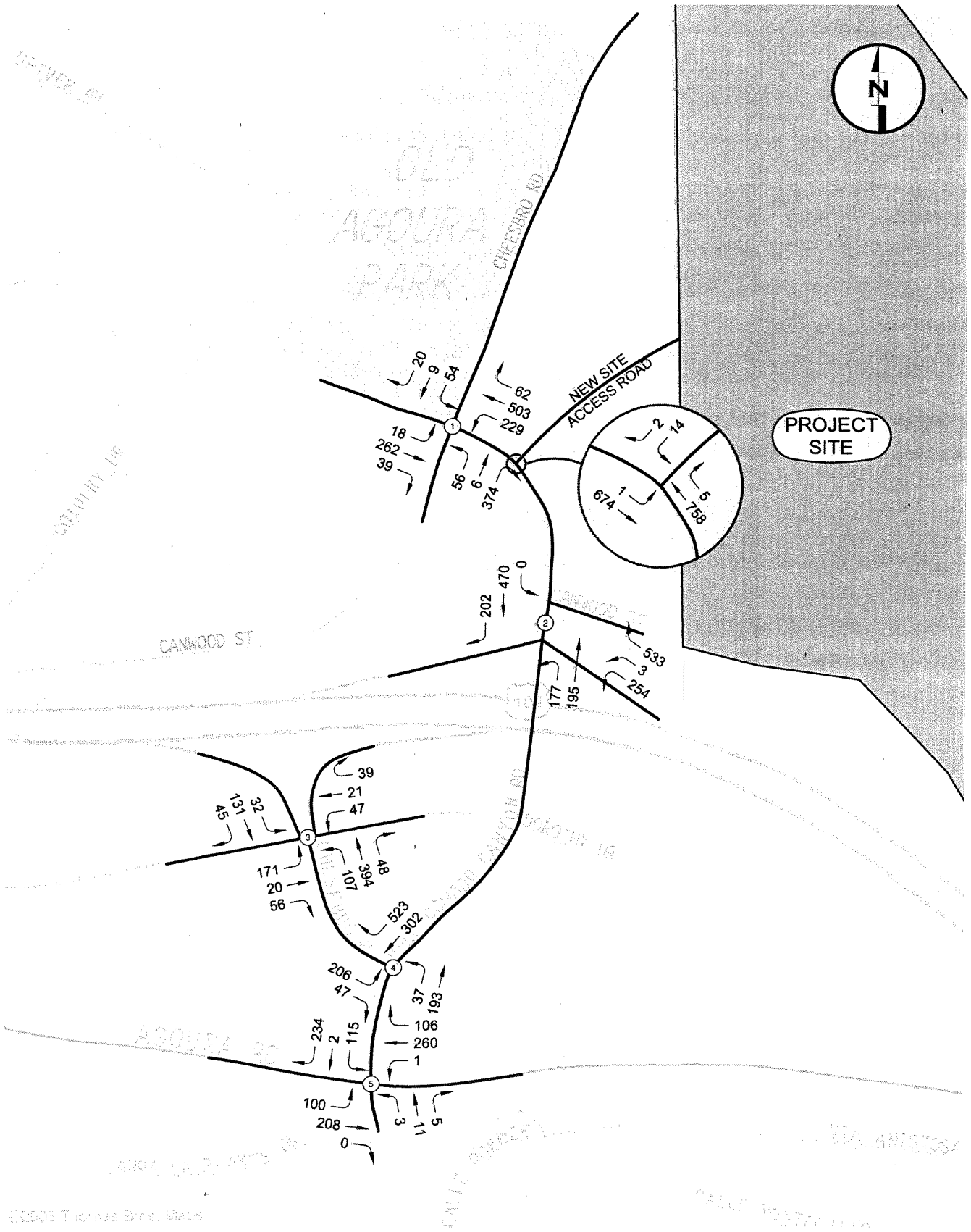

FIGURE 7(f)

FUTURE (2010) TRAFFIC VOLUMES
WITH INTERIM 390 STUDENT PROJECT
(INCLUDING REMOVAL OF EXISTING SCHOOL TRIPS)
PM PEAK HOUR

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credits were assumed for the "off peak" time periods, since no data was collected regarding the existing site trip generation during these times. Although it is expected that some "off peak" trip activity currently exists, this assumption guarantees a "worst case" assessment of potential impacts during the "off peak" hours.

Both the 'Future (2010) Without Project" traffic volumes shown in Figure 6(a) through Figure 6(f) and the Future (2010) With Interim School and Mid-Block Access" traffic volumes shown in Figure 7(a) through Figure 7(f) were evaluated using the same Critical Movement Analysis (CMA) methodologies and assumptions detailed in the previous studies; the differences between the "Without" and "With Interim School and Mid-Block Access" traffic scenarios indicates the incremental traffic impacts directly attributable to the proposed Heschel School operations at each of the study intersections during each of the analysis periods. The results of these analyses are summarized in Table 2.

The Los Angeles County Department of Public Works defines a significant traffic impact at intersections based on a "stepped scale", with intersections at high volume-to-capacity ratios and levels of service exhibiting more sensitivity to additional traffic than those operating at better levels of service. A significant impact is identified as an increase in the CMA value of 0.040 or more when the final ("With Project") Level of Service is LOS C (CMA range 0.701 to 0.800), a CMA increase of 0.020 or more at LOS D (CMA range 0.801 to 0.900), or a CMA increase of 0.010 or more at LOS E or F (CMA range 0.901 or greater). No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic flows.

Using these criteria, the incremental project impacts shown in Table 3 were evaluated, and the results indicate that the proposed interim, 390-student Heschel School, including the new "mid-block" Palo Comado Canyon Road site access roadway and aggressive student carpool/busing program described previously, would not produce significant impacts at any of the five study intersections, and in fact, could result in improvements to traffic conditions at several intersections, primarily due to the removal of existing, single-occupancy School related vehicle trips to the Liberty Canyon School site. Note also that project incremental impacts to intersections 3, 4, and 5 are identical to those identified in the March 2007 analyses, since project trip distributions are not expected to change from the previous assumptions at these locations as a result of implementation of the proposed mid-block access.

Table 2
Critical Movement Analysis Summary
Future (2010) Without and With Interim 390-Student School and Mid-Block Access Conditions

Int. No.	Intersection	Peak Period	Without Project CMA	Without Project LOS	With Interim School and Mid-Block Access CMA	With Interim School and Mid-Block Access LOS	Impact
1	Canwood St./Chesebro Rd. at Driver Ave./Palo Comado Cyn. Rd.	AM	0.709	C	0.702	C	-0.007
		Post-AM	0.538	A	0.546	A	0.008
		Pre-PM School	0.390	A	0.398	A	0.008
		PM School	0.748	C	0.740	C	-0.008
		Pre-PM	0.602	B	0.603	B	0.001
		PM	0.733	C	0.733	C	0.000
n/a	Palo Comado Cyn. Rd. at New School Access Road	AM	----	---	0.548	A	---
		Post-AM	----	---	0.476	A	---
		Pre-PM School	----	---	0.379	A	---
		PM School	----	---	0.631	B	---
		Pre-PM	----	---	0.554	A	---
		PM	----	---	0.646	B	---
2	Palo Comado Cyn. Rd. at US-101 Fwy. NB Ramps [1]	AM	0.758	C	0.785	C	0.027
		Post-AM	0.631	B	0.672	B	0.041
		Pre-PM School	0.481	A	0.522	A	0.041
		PM School	0.850	D	0.866	D	0.016
		Pre-PM	0.773	C	0.789	C	0.016
		PM	0.978	E	0.986	E	0.008
3	Chesebro Rd./US-101 Fwy. SB Ramps at Dorothy Dr.	AM	0.559	A	0.573	A	0.014
		Post-AM	0.551	A	0.568	A	0.017
		Pre-PM School	0.467	A	0.484	A	0.017
		PM School	0.633	B	0.647	B	0.014
		Pre-PM	0.580	A	0.590	A	0.010
		PM	0.724	C	0.729	C	0.005
4	Chesebro Rd. & Palo Comado Cyn. Rd. at Chesebro Rd.	AM	0.473	A	0.498	A	0.025
		Post-AM	0.450	A	0.474	A	0.024
		Pre-PM School	0.359	A	0.383	A	0.024
		PM School	0.529	A	0.546	A	0.017
		Pre-PM	0.456	A	0.467	A	0.011
		PM	0.566	A	0.573	A	0.007
5	Chesebro Rd. & Laura La Plante Dr. at Agoura Rd.	AM	0.353	A	0.333	A	-0.020
		Post-AM	0.480	A	0.492	A	0.012
		Pre-PM School	0.420	A	0.432	A	0.012
		PM School	0.491	A	0.474	A	-0.017
		Pre-PM	0.453	A	0.458	A	0.005
		PM	0.684	B	0.684	B	0.000

Additionally, the new intersection of Palo Comado Canyon Road and the new School access road was also analyzed, and as shown in Table 2, will operate acceptably during each of the analyzed periods, with LOS B operations during the critical PM School Peak and PM peak hours. This intersection will operate at LOS A conditions at other times of the day. Further, a review of the anticipated traffic volumes using the proposed new southbound left-turn pocket proposed on Palo Comado Canyon Road at the new mid-block project access driveway indicates that no significant vehicular queuing will occur. As shown in Figures 5(a) through 5(f), the maximum number of vehicles anticipated to access the site via this route is approximately 14 pce vehicles, during the AM peak hour. These nominal traffic volumes would result in an average peak arrival rate (150 percent of the hourly average) of less than one vehicle arriving every two minutes at the left-turn pocket, which will not create any significant vehicular queuing.

However, due to the anticipated operations of the proposed School, it is likely that vehicles accessing the site during the morning will do so within a shorter time period than the typical one-hour period assumed for the above generalized calculations. Therefore, assuming that all vehicles arrive within a 15-minute time period, and that the maximum arrival rate is twice the hourly average, this "worst case" vehicle arrival scenario still results in fewer than two (2) vehicles using the left-turn pocket per cycle (assuming 60 cycles per hour); at an assumed length of 25 feet per vehicle, the maximum vehicle queue length would be anticipated to be approximately 50 feet in length. Therefore, as shown previously in Figure 3, the proposed 75-foot length of the new left-turn pocket will be more than adequate to accommodate the anticipated maximum number of vehicles using this access to the interim School. At no time would vehicles in the new left-turn lane be expected to queue into the nearby intersection of Canwood Street/Chesebro Road and Driver Avenue/Palo Comado Canyon Road, approximately 90 feet northwest of the new access driveway intersection. However, if arriving School-related vehicles were to temporarily queue unexpectedly beyond the 75-foot left-turn pocket, Figure 3 also indicates that the southbound "through" lane on Palo Comado Canyon Road adjacent to the left-turn pocket is approximately 21 to 22 feet wide, providing sufficient width for southbound vehicles to maneuver around these temporary vehicle queues without disrupting traffic flows.

It is also understood that although the analyses summarized in Table 2 indicate that the proposed Heschel School will not result in significant impacts to any of the study intersections based on the CMA analyses described above, incremental project trips will add to existing delays experienced at all of the study locations. However, these incremental project-related delays are anticipated to be relatively small (generally in the range of only a few additional

seconds per vehicle) based on the reduced trip generation levels associated with the proposed student carpool program School, and are not expected to substantially change the operations of any of the study intersections. The potential for additional delay at the study intersections is noted in the original traffic analyses, and could be alleviated through installation of new traffic signals. However, the City of Agoura Hills has voiced objections to installation of traffic signals in the study area due to the rural nature of the vicinity, even though the original analyses indicated that many of the study intersections currently meet warrants for traffic signalization, prior to either project-specific or cumulative traffic additions.

Analysis of Project Impacts to Neighborhood Streets

In addition to the analysis of project traffic impacts at the five study intersections, potential School-related impacts to the local/residential streets surrounding the project site were also investigated. The methodology used to determine impacts on local/neighborhood streets is based on daily (24-hour) traffic volumes along each street, rather than on the "peak hour" methodology described earlier for the study intersection impact analyses.

Using the daily trip generation estimates summarized earlier in Table 1, and the revised, "mid-block" access scenario project traffic distributions shown in Figure 4, the amount of daily project-related trips along each of the studied local/neighborhood street segments was calculated. As with the analysis of project intersection impacts described earlier, these "net" new daily project traffic volumes also account for the removal of approximately 135 daily trips along the Driver Avenue/Palo Comado Canyon Road corridor, as these student-related vehicle trips will be eliminated through their incorporation into the student busing program, or by the relocation of the existing student population from the Liberty Canyon site to the proposed new School location. The future (year 2010) "Without" and "With Interim School and Mid-Block Access" local/neighborhood street daily traffic volumes are shown in Table 3.

The Los Angeles County Department of Public Works - Traffic and Lighting Division does not currently have in place any criteria for determining the significance of project traffic additions to low-volume residential streets. Therefore, for the purposes of this analysis, the significance criteria for assessing a project's traffic impact on local residential streets was based on the criteria defined by the City of Los Angeles Department of Transportation (LADOT) in their most recent traffic impact analysis guidelines[1]. Those guidelines indicate that, for streets with less than 1,000 vehicles per day, a significant impact is defined as an increase of 16 percent or more

[1] Los Angeles Department of Transportation (LADOT), *Traffic Study Policy and Procedures*, Revised March 2002.

Table 3
Local/Neighborhood Street Average Daily Traffic Impact Analysis
Future (2010) Without and With Interim School and Mid-Block Access Conditions

Street/Segment	Without Project ADT	Net Project * ADT	With Project ADT	Project Impact	Significance Threshold	Significant Impact
Driver Ave. W/o Chesebro Rd.	10,190	(53)	10,137	-0.5%	8.0%	No
Chesebro Rd. N/o Driver Ave.	1,770	0	1,770	0.0%	12.0%	No
Palo Comado Cyn. Rd. E/o Chesebro Rd.	9,540	241	9,781	2.5%	8.0%	No
Canwood St. S/o Driver Ave.	5,660	0	5,660	0.0%	8.0%	No
Driver Ave. W/o Colodny Dr.	8,950	(53)	8,897	-0.6%	8.0%	No
Chesebro Rd. N/o Agoura Park	1,660	0	1,660	0.0%	12.0%	No

Note:
"*" Includes reductions in traffic resulting from removal of existing Heschel School student vehicles and incorporation of these trips into proposed student busing program.

in the total future daily traffic volumes (including ambient traffic growth, cumulative development traffic, and project-related trips) on the street. For roadways carrying between 1,000 and 2,000 daily trips, an significant impact occurs at an increase of 12 percent or more of the total future traffic on the street; for streets with between 2,000 and 3,000 daily trips, a 10 percent increase is deemed to constitute a significant impact, and for roads with more than 3,000 daily trips, an 8 percent increase is the threshold.

As shown in Table 3, the net impacts of the proposed interim Heschel School, including the new "mid-block" Palo Comado Canyon Road access and student carpool/busing program, on the surrounding local/neighborhood streets are well below the thresholds for significance, and no significant impacts to any street segment in the project vicinity are anticipated. Therefore, no project-specific mitigation measures are warranted. However, as described later in the "Mitigation Measures" section of this report, the School will implement a number of roadway improvements as part of the mid-block access scheme that will provide additional capacity for area traffic circulation, further reducing the potential for traffic congestion in the vicinity.

Analysis of Project Impacts on Regional Transportation System

To address the increasing public concern that traffic congestion was impacting the quality of life and economic vitality of the State of California, the Los Angeles County Congestion Management Program (CMP)[2] was enacted to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. A countywide approach has been established by the Metropolitan Transportation Authority, the local CMP agency, to implement the statutory requirements of the CMP.

The CMP project traffic impact analysis (TIA) guidelines require analyses of all CMP monitoring intersections where the project could add a total of 50 or more trips during either peak hour. Additionally, all freeway segments where a project could add 150 or more trips in either direction during the peak hours must be analyzed.

A detailed analysis of both the CMP arterial monitoring intersections and freeway segments applicable to the project vicinity is included in the approved project's traffic study and EIR. Those analyses concluded that no significant traffic impacts would result from the full-enrollment project (750 students) at any arterial monitoring intersection or freeway segment. As noted in the supplemental March 2007 analysis of the interim School operations, the proposed interim student busing program and reduced enrollment limits result in a substantial decrease in both daily and peak hour traffic volumes for the School; this analysis includes the same levels of project traffic as noted in the March 2007 study. Therefore, no significant impacts from these less intensive interim conditions are anticipated, and no further CMP analyses are warranted.

Analysis of Future (2010) Cumulative Impacts

The preceding analyses indicate that the proposed interim Heschel School, including an aggressive student carpool/busing program and new mid-block access from Palo Comado Canyon Road, would not produce project-specific significant traffic impacts at any of the area study intersections and one of the local/residential streets. However, the project will add incrementally to the anticipated future traffic growth in the vicinity, including both "localized" traffic increases resulting from the ongoing development of other projects within the immediate study area, including projects within Los Angeles County and the City of Agoura Hills, as well as "pass through" or commuter traffic resulting from more distant development.

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[2] *2004 Congestion Management Program for Los Angeles County*, Los Angeles County Metropolitan Transportation Authority, Los Angeles, 2004.

The forecast "Future (2010) Without Project" conditions described previously already account for anticipated "ambient" traffic growth potential in the study area resulting from increases in traffic produced by already existing development (due to additional or new vehicles within existing households, business expansion, etc.), or from developments that are not yet proposed or are outside the study area. However, additional traffic is also anticipated from a number of specific new developments within the study area that are either proposed, approved but not yet under development, or are currently under construction.

A detailed listing of the anticipated future "cumulative" development projects are contained in the approved project traffic study; that listing and the anticipated future traffic additions to the study intersections resulting from these "related projects" are incorporated herein by reference. Note that this project listing and the associated traffic volume estimates were also utilized in the March 2007 supplemental analyses; the cumulative development assumptions were reviewed in that document and found to be consistent with current information reflected in more recent studies conducted for the project vicinity.

This cumulative development traffic was added to the "With Interim School and Mid-Block Access" project traffic conditions shown in Figures 7(a) through 7(f) in order to produce an estimate of the future "With Cumulative Development" conditions, which also includes the traffic expected to be generated by the proposed interim Heschel School project. The resulting cumulative traffic volumes at the study intersections are shown in Figure 8(a) for the AM peak hour, Figure 8(b) for the Post-AM peak hour, Figure 8(c) for the Pre-PM School peak hour, Figure 8(d) for the PM School peak hour, Figure 8(e) for the Pre-PM peak hour, and Figure 8(f) for the PM peak hour periods.

The "With Cumulative Development" forecast future traffic volume scenario was then analyzed using the CMA methodology described previously, and the resulting CMA values and corresponding levels of service for each intersection were determined. The difference in CMA values between the "Without Project" and "With Cumulative Development" conditions represents the total anticipated (cumulative) future traffic impacts to each of the study intersections, including the proposed Heschel School project. The results of the analysis of future (year 2010) cumulative conditions are shown in Table 4.