



"Gateway to the Santa Monica Mountains National Recreation Area"

May 16, 2005

Daryl Koutnik
County of Los Angeles
Department of Regional Planning
Impact Analysis Section, Room 1348
320 West Temple Street
Los Angeles, CA 90012

SUBJECT: COUNTY PROJECT NO. 98-062, CUP NO. 98-062, SCH NO. 1998101060;
HESCHEL SCHOOL PROJECT REVISED DEIR

Dear Mr. Koutnik:

Thank you for the opportunity to review and provide comments on the Revised Draft Environmental Impact Report (DEIR) for the Heschel School Project. The project involves the construction of a private school on a 73-acre site located within unincorporated Los Angeles County, adjacent to the eastern boundary of the City of Agoura Hills. A DEIR was previously prepared and circulated for public review in October 2002, with hearings conducted in March and May of 2003, and the City of Agoura Hills submitted a letter on the DEIR. At that time, we understand that the County Regional Planning Commission requested that the DEIR be revised to address further issues, and recirculated pursuant to the California Environmental Quality Act (CEQA).

The project is to be built on property located solely within the unincorporated area of Los Angeles County, but the site directly abuts our city. As such, many of the impacts associated with the project will have the potential of significantly affecting our City, and many of the mitigation measures will need to be implemented within our City limits. Therefore, it is important that the EIR prepared for this project serve as a full environmental disclosure document, and that project alternatives and appropriate and feasible mitigation measures be identified in the EIR.

Main access to the site is proposed through the City of Agoura Hills via the easterly extension of Canwood Street. The Draft EIR identifies a number of traffic improvements, including roadway widenings and signalization of intersections, all within the City of Agoura Hills to accommodate this project. However, the City has not been consulted in the development of these mitigations and we have strong opinions that are contrary to the

recommendations. For example, the proposed traffic mitigation measures at the intersection of the 101 Freeway and Palo Comado Canyon Road/Canwood Street are not acceptable at all. We believe that the proposed roundabout and/or signal modifications will not operate in a safe or efficient manner. The City will not approve the designs as shown in the DEIR. Additionally, several other mitigation measures are recommended. However, the report states that a "fair-share" will be paid by the developer. Again, this is not acceptable as we recommend that the mitigation be installed or the applicant identifies the dollar value and to whom the mitigation would be paid. All "fair share" arrangements shall be reviewed by the City. Finally, all traffic improvements constructed in the City must be acceptable to the City, and are subject to our design approval, Caltrans approval, and the County of Los Angeles Public Works signal design and maintenance operations approval.

Moreover, the site is located at the entrance of Old Agoura, a distinct low density residential neighborhood characterized by the large lots suitable for horse keeping and the presence of native plants (including an abundance of oak trees) in home landscaping. Also, the existing infrastructure such as roads, drainage system, and lack of street lights are characteristic of a non-urban community. The City has in place a number of ordinance and policy provisions to help retain and enhance this rural setting. It is important that mitigation measures adopted for this project are compatible with and respectful of the fabric of Old Agoura.

The City of Agoura Hills prepared a detailed letter regarding the original DEIR, dated December 11, 2002. We are pleased that many of the comments raised in that letter have been responded to in the current Revised DEIR. However, there are still a number of items that have not been adequately addressed, should be addressed further, or are new issues based on the updated project. We would appreciate your responses to the following items in the Revised DEIR.

GENERAL COMMENTS

1. Starting on page 2.0-11, project Phases I through VI are described, but only generally, and therefore inadequately. As presented, it is challenging for the reader to fully understand the incremental development of the project, and therefore be provided with a clear understanding of the potential project impacts pursuant to CEQA. The specific development data of each phase (particular buildings/facilities and other improvements or infrastructure with square footage, location and height of each) should be clearly outlined in a table format. An exhibit highlighting the specific development in each phase would also be extremely useful. In order to accurately analyze potential impacts as the project is gradually developed through these phases, a separate impact/mitigation measure discussion by environmental issue area should be provided for each phase, and assessed cumulatively as the phases proceed. This is of particular importance, since there is no guarantee that subsequent phases would actually be constructed. Therefore, each phase's impacts should be mitigated at the time of implementation. Equally important is identifying who will be responsible for implementing and paying for these mitigations.

2. Section 2.0 Project Description (pages 2.0-2 and 2.0-9 through -10) describes the purpose of the project and briefly notes possible additional uses of the school facility. One of the project objectives on page 2.0-2 states, "Construct a 'state of the art' private, educational, cultural, and recreational facility." This implies that the project is intended to serve as more than just a school. However, there is insufficient data provided in Section 2.0 regarding these other uses to provide the basis for an adequate impact analysis in Section 4.0 under each environmental issue area. The DEIR needs to specifically address, for example, how these special events would impact noise, parking and traffic in the area. The estimated type, size, frequency and location of the special events needs to be stipulated and parameters/restrictions placed around the events to ensure that there are no adverse significant impacts. Page 2.0-10 notes that *evening* events attracting more than 150 persons would be limited to 24 occurrences annually. This equates to every other week, which is a substantial amount of large special events. No mention is made of the limitations on *daytime* events attracting more than 150 persons. Therefore, it is assumed that the daytime large events would be in addition to these evening events.
3. The project description notes that the school will accommodate students in the K-8th grade range. However, the structures and other amenities can easily accommodate a high school. As such, the DEIR should also consider potential impacts of expanding this facility to include high school students.

SPECIFIC COMMENTS

Section 2.0 Project Description

4. Page 2.0-2, 2nd paragraph: The discussion of "PROJECT APPROVALS AND ENTITLEMENTS" should also note that acceptance, design, approval and issuance of encroachment permits from the City of Agoura Hills would be necessary for drainage and right-of-way improvements proposed as part of the project.
5. Page 2.0-12, 4th paragraph: Reference is made to multi-purpose rooms (Buildings A and B) being constructed in Phase I, but these buildings do not appear to be shown on Figure 2.0-5 Phase I Site Plan. Please clarify when these buildings would be constructed and where.

Section 3.0 Environmental and Regulatory Setting

The site is located within the County's Santa Monica Mountains North Area Plan (NAP) boundaries. The origins of the NAP date back to the early 1990s when four area cities, two municipal service agencies, and the National Parks Service joined a coalition with the County of Los Angeles to fund and develop a comprehensive set of revisions to the region's land use plans. Among the purposes of this effort was to produce an integrated land use and transportation policy that is acceptable to the program's participating agencies, preserves open space, resolves existing and potential conflicts between the

agencies, defines a system to coordinate land development with the provision of infrastructure, establishes stable boundaries between urban and rural areas, protects the character of existing urban and rural communities, and respects the individual interests of each agency. Moreover, all the participating agencies embraced the guiding principle of the NAP which is “let the land dictate the type and intensity of land use.” The land use policy map of the NAP was developed based on these basic tenets. Specifically, the subject site is designated N5 on the land use map, which would allow for residential development at a density of one unit per five acres, yielding a maximum of 14 single family homes. While a private school is permitted with the approval of a CUP, a development containing in excess of 166,000 sq. ft. of building area and the associated alteration of land to accommodate a 750 student school was not contemplated in the NAP nor was the infrastructure, especially traffic, planned to accommodate such use. Therefore, it is important that the DEIR contain analysis of how the proposed project and the mitigation measures comply with the regulatory setting established under the North Area Plan. The following are specific comments related to the Environmental and Regulatory Setting section of the report.

6. Page 3.0-6, “Surrounding Land Use”: This discussion should more accurately reflect the unique character of Old Agoura, with its predominant equestrian uses and more rustic, semi-rural character. Instead, the text describes the local setting as “suburban in nature.” Greater emphasis should be placed on the special character of this adjacent residential community.
7. Page 3.0-12, last paragraph: Reference is made to substantial setbacks being provided – in excess of 300 feet from adjacent residential properties. This distance appears inaccurate from Figure 2.0-5, and page 4.1-23 states that “the site plan incorporates a minimum 100-foot buffer between adjacent residential uses.” The DEIR should clarify this distance, and the distance noted should be consistent throughout the document.
8. Page 3.0-15: Goal VII of the North Area Plan (NAP) includes a well-integrated transportation system, including public transit modes. In this section, the DEIR states that the project would facilitate use of public transit through placement of an educational facility near to established transit routes, however elsewhere in the document it is noted that students would likely not utilize public transit. It appears that the prohibitively long, steep driveway entrance to the school would further discourage the use of public transit by students walking from the campus. The project should include some form of shuttle from the campus proper to transit stops in Agoura Hills to fully meet the intent of the NAP goal. Additionally, the project should incorporate a vanpool or other carpool system, with strong incentives for its use by students and faculty/staff.
9. Page 3.0-17, “Hillside Management Goals & Policies” and p. 4.6-15 2nd and 3rd paragraphs under Item 2: As described in the DEIR, the project does not seem consistent with Goal IV-2 and Policies IV-12 and -13 of the NAP. There would be manufactured slopes of up to 50 or 60 feet (the information on p. 4.6-15 seems to

be contradictory), not the maximum 10 feet encouraged by the NAP, nor the 25-foot maximum slope height allowed in the City. Also, the project would cut significant ridgelines, contrary to the NAP policy. The DEIR argues that the project is consistent with the NAP in these areas, but the text does not support this conclusion. Further analysis and discussion of the policy consistency, and perhaps changes to the project, are warranted.

10. Page 3.0-29: The DEIR describes the areas immediately to the west of the subject site (Old Agoura) as "suburban residential." However, Old Agoura lacks many of the characteristics of a suburban development, and in fact should be characterized as semi-rural.
11. Page 3.0-30 (and throughout document): Reference is made to the proposed use being permitted under the land use designation and zoning. This section goes on to note that the project can be found consistent with the general goals and policies of the North Area Plan (NAP). It should be clarified that the project requires a conditional use permit (CUP) with certain findings to be made, and consistency with the NAP would in part be predicated on approval of the CUP.
12. Page 3.0-33, discussion of Agoura Hills Ventura Freeway/Can wood Corridor Visions Plan: This Visions Plan is not a regulatory document, but rather a conceptual design study commissioned by the City for the sake of creating a development vision for the north freeway corridor. This study was completed in 1998, and the freeway interchange improvements shown on this vision plan have since been revised significantly to reflect loop ramps rather than hook ramps. The DEIR must be corrected to clarify that the Visions Plan is intended as a design study and not a regulatory land use plan or a transportation plan.

Section 4.1 Visual Resources

13. The discussion of impacts in this section (particularly on page 4.1-26) needs to include an overall analysis of the proposed landscape design in the context of the surrounding community, not just as viewed from certain vantage points. The landscape design should be naturalistic in approach, although trees in some areas (e.g., parking lots) would resemble an orchard-like layout. It is important that these design elements be clearly specified as components of the project in the DEIR, or at least be outlined in the DEIR as mitigation measures. Mitigation Measure 4.1-1 on page 4.1-24 needs to describe the types of vegetation to be planted (Valley Oaks, species of other plants and shrubs, etc. - native species should be used) and the specific locations (an exhibit would be highly useful) along the site perimeters in order to verify that there will be adequate screening for aesthetic purposes, and potentially significant impacts would be mitigated.
14. Figures 4.1-5 through 4.1-6 depict expected views of the project site from various off-site locations via photo-simulation techniques, and incorporate proposed landscaping. The text should note the number of years after planting that the

vegetation is depicted to gain a better understanding of the potential visual impacts at different stages in time. Further, it would be useful to provide a photo-simulation exhibit of the vegetation just after installation, approximately three years later, and at full maturation (with the estimated year).

15. Page 4.1-28, Mitigation Measure 4.1-3(6): This measure should be revised to require motion sensor devices on all security lighting. If such devices are not feasible, then an alternate, low-level lighting fixture should be utilized. The intensity of the security lighting should be as minimal as practical, especially on exterior portions of the site adjacent to open space and residential areas.
16. Page 4.1-28, 1st paragraph and Mitigation Measure 4.1-3(2): The text in the first paragraph on page 4.1-28 should include a discussion of the various "lighting zones" and how they are defined in terms that the reader can readily understand. Reference is made to Lighting Zone 4 in this paragraph, and Mitigation Measure 4.1-3(2) references Lighting Zone 2. However, no explanation of Lighting Zone 2 is provided. The paragraph notes that studies have shown that the average lighting power density for school parking lots and roadways is 0.05 watts/square foot, while that for campus security lighting is 0.10 watts/square foot. Consequently, Mitigation Measure 4.1-3(2) stipulates that the parking lots should have no more than 0.05 watts/square foot. However, the semi-rural setting of the project site, surrounded by designated open space areas and a low-density residential neighborhood with equestrian uses, should be a significant consideration when determining the appropriate wattage for the parking lot. The school site is not typical of areas where schools are normally located, which is often within an existing urban environment, and the allowed wattage should be reduced accordingly. Therefore, this mitigation measure should stipulate wattage less than 0.05, and the mitigation measure should also stipulate wattage less than 0.10 for security lighting and wattage less than 0.08 for walkway lighting. Additionally, the EIR should explore parking lot lighting alternatives to the typical light pole standards that are lower in scale and prominence, such as bollards. A low (about three feet), decorative wall around the perimeter of the parking lot near the existing residences to shield vehicle headlights should also be added to the project. As proposed, Mitigation Measure 4.1-3 is not adequate, and additional measures could further reduce impacts.
17. A discussion of potential glare and possible light reflection from roofing materials should be provided in this section. On page 4.1-29, Mitigation Measure 4.1-4: This measure should also prohibit non-reflective roofing materials.
18. Page 4.1-31, "Public Issues": This section describes potential aesthetic impacts from "initial phases" of the project. As noted in General Comment #1, starting on page 2.0-11, Phases I through VI are described. In order to accurately analyze potential impacts as the project is gradually developed through these phases, a separate impact/mitigation measure visual resources discussion should be provided for each phase and cumulatively as the phases proceed. This is of particular

importance, since there is no guarantee that subsequent phases would actually be constructed. Therefore, each phase's impacts should be mitigated at the time of implementation.

19. Page 4.1-23, 2nd paragraph: This section notes that the pre-kindergarten unit is a one-story building with a total height of 33 ½ feet, and will be the closest structure to nearby residential uses. This height seems excessive for such a use that is limited to one story. This building should be scaled down, given its proximity to adjacent residences. Similarly, the discussion in the last paragraph on page 4.1-26 should be revised. The text is misleading in that it states that, "The taller buildings with greater mass will be located towards the rear of the site plan, further back into the site interior. The site plan places the smaller, less bulky multipurpose room, school entry, and auditorium (with a height of 38 feet) along with the pre-kindergarten (with a height of 33-1/2 feet) toward the front of the site plan." In actuality, the Pre-K building and the 38-foot multi-purpose room are quite tall, and so there does not appear to be much of a height transition from the edges of the site. The buildings depicted on Figures 2.0-3a and -3b, which appear to include some of the larger, interior buildings, scale off at about 30 feet, less than the Pre-K structure. Therefore, the conclusions made in the DEIR regarding aesthetic impacts from building heights appear contradictory and not substantiated by adequate data. As noted in Comment #1, the DEIR needs to clearly list the various buildings proposed and their heights. Assuming from the data in the DEIR that the "taller" structures would be over 38 feet, even though they would be placed in the site interior, the heights of these taller two-story structures should also be lowered to minimize visual impacts as viewed from off-site by maintaining consistency with the lower scale structures of the community. These buildings could continue to be two stories, but be reduced in height. Reducing the building heights is a feasible measure to mitigate potential aesthetic impacts.
20. Page 4.1-28, Mitigation Measure 4.1-3: A measure should be added to require photometric mapping of off-site illumination to be provided to the County of Los Angeles Department of Regional Planning for review and approval to ensure that lighting impacts are minimized.
21. A discussion of roof-mounted mechanisms should be provided in this section. The following mitigation measure is recommended for incorporation into the DEIR: "Any roof mounted venting, elevator or heating equipment shall be fully screened from public view, including the residential properties to the west. Roof screening treatments, if needed, shall be subject to the approval of the County of Los Angeles Planning Department."
22. To further minimize potential visual impacts from off-site from the siting of the parking lot, the DEIR should consider breaking the parking field into orchard-planted smaller pattern parking areas in other portions of the site either as a project

alternative. This will better preserve the rural nature of the site and surrounding community.

23. To ensure that the open space area proposed on the western edge of the site, between the school parking lot and the existing Old Agoura residences, is retained in a natural, undeveloped state, the DEIR should address methods of dedicating this area of the site as permanent open space. Such methods could include easements, deed restrictions, etc. Additionally, native species revegetation should be considered in this area, along with possible other passive uses mentioned in our previous letter DEIR letter dated December 11, 2002, including: low-intensity equestrian facilities, open fields for grazing, and other related uses compatible with the surrounding area.

Section 4.2 Transportation and Access

24. Traffic Mitigation Measures

The traffic analysis prepared for the DEIR found that the project could create significant traffic impacts at the following three intersections:

- Canwood Street and Chesebro Road at Driver Avenue/Palo Comado Canyon Road;
- Palo Comado Canyon Road at the westbound U.S. 101 ramps; and
- Chesebro Road and U.S. 101 eastbound ramps at Dorothy Drive.

A series of mitigation measures are proposed for these impacts. For the Canwood Street and Chesebro Road at Driver Avenue/Palo Comado Canyon Road intersection, a signal is recommended. Alternately, improvements to the eastbound and westbound approaches with a left turn lane and shared through/right turn lane and some minor roadway widening could be accomplished. At Palo Comado Canyon Road at the westbound U.S. 101 ramps, the DEIR mitigation measure includes either a roundabout, or a traffic signal with restriping of lanes and widening of roadways. Lastly, for the Chesebro Road/U.S. 101 eastbound ramps, the mitigation measure consists of a traffic signal. Alternatively, the northbound approach could be restriped to provide one shared left-turn/through lane, and one shared through/right-turn lane, as well as creating two receiving lanes on the U.S. 101 on-ramp. Additionally, the DEIR includes improvements along the west side of Palo Comado Canyon Road to complete a 32-foot roadway from Canwood Street/Chesebro Road to the westbound U.S. 101 on-ramp. Also, mitigation measures for potential cumulative impacts include installing a traffic signal at both the Chesebro Road/Palo Comado Canyon Road, and Chesebro Road/Laura La Plante Drive at Agoura Road.

As currently designed, some of the proposed solutions are not acceptable to the City of Agoura Hills, and would not be approved by the City. It is important to

note that the traffic impacts would affect areas within City boundaries, and the improvements outlined in the mitigation measures would occur within City limits. Therefore, acceptance of these mitigations, approval of their design, and issuance of encroachment permits from the City of Agoura Hills would be necessary.

The City believes that certain mitigation measures are infeasible and fundamentally flawed. For example, the proposed sole access point on Canwood Street at Palo Comado Canyon Road is unacceptable, as the amount of traffic entering and exiting Canwood Street in close proximity to the westbound U.S. 101 ramps cannot be adequately mitigated. The applicant has now proposed a roundabout. The roundabout as currently shown would not function well due to several problems:

- The internal diameter of the roundabout is too small. A larger diameter is needed for safe and efficient movement. The EIR has not addressed the impacts for land and/or business acquisition.
- The outside diameter of the roundabout is too small. If a roundabout was to be utilized at this intersection, it should accommodate two lanes of traffic (not one).
- With 5 legs of ingress/egress at this location, the proposed roundabout is a safety concern.
- The roundabout does not accommodate the City's General Plan future bridge widening proposal.

A traffic signal at this same intersection would also be problematic. This issue was detailed in our previous comments to the applicant during the last DEIR review, and is not an acceptable mitigation measure. The close proximity of Canwood Street from the freeway ramps would create conflicting traffic signal indications for drivers turning right from the freeway off-ramp or those proceeding north on Palo Comado Canyon Road.

Moreover, the City is concerned with the remaining recommendations to install traffic signals at several other area intersections, given the significant change in character resulting from such improvements, which would create a more urban environment in what is now a fairly semi-rural neighborhood. At this time, the City recommends that the only additional signal to be installed should be located at the EB 101 freeway ramp at Dorothy Drive.

The DEIR needs to reassess the proposed mitigation measures to create more feasible solutions to the anticipated significant traffic impacts caused by the project. This would include coordination with staff of the City of Agoura Hills to explore other options, and there would need to be coordination with other agencies, such as Caltrans and the County of Los Angeles Public Works Department to ensure that all appropriate agencies find the specific solutions acceptable. In any case, the DEIR should also assess potential impacts from implementation of the listed mitigation measures.

25. Page ES-10 and throughout Section 4.2: Canwood Street and Chesebro Road at Driver Avenue and Palo Comado Canyon Road. The wording that states "...a traffic signal is necessary ..." should be changed to "a traffic signal is recommended..." Also, it should be noted that the City of Agoura Hills is not recommending a traffic signal at this location. Therefore, the applicant shall be required to improve the intersection based upon other acceptable mitigation improvements. As stated on Page ES-10, Section 4.2-6, additional right-of-way will be required at this intersection. The applicant shall be required to acquire all necessary right-of-way prior to issuance of a grading permit for the site. In addition, the EIR shall evaluate the acquisition of the right-of-way from the adjacent property owners. The last paragraph of this mitigation measure should be eliminated and written as follows: "This mitigation measure shall be implemented prior to certificate of occupancy for the first building."
26. Palo Comado Canyon Road at US 101 Westbound Ramps. The roundabout as shown is not acceptable. The applicant shall evaluate a 2-lane roundabout that will accommodate future traffic and the Palo Comado bridge widening as shown on the Traffic Circulation Element of the City's General Plan. The roundabout shown will need to have a larger inside and outside diameter to accommodate all movements. This will require the taking of additional private property and will need to be evaluated as part of the EIR. As stated in our last comments, the applicant should fully explore other access points and eliminate the Canwood Street access. In addition, it should be noted that Caltrans will not conduct the necessary engineering studies to determine which of the two alternatives are selected. All studies will need to be conducted by the applicant. Any mitigation measure that is approved for this section shall be implemented prior to issuance of a Certificate of Occupancy for the first building.
- The traffic signal alternative is still not an acceptable solution. See previous comments from our submittal during the last DEIR review period. The City has not received any verbal or written communication from Caltrans, or the County of Los Angeles Public Works Department that either of these alternatives would be supported or acceptable.
27. Chesebro Road and US 101 Eastbound Ramps at Dorothy Drive. The traffic signal as proposed for this intersection is acceptable to the City at this time. The applicant shall implement this mitigation measure prior to issuance of a Certificate of Occupancy for the first building. This should be clarified in the DEIR.
28. Page ES-9 and throughout section. The "fair share" needs to be established at this time. Also, it should be stated in the EIR that all "fair share" costs shall be paid to the City of Agoura Hills.

29. Canwood Street and Chesebro Road at Driver Avenue and Palo Comado Canyon Road. This item shows that there will be a need to acquire right-of-way. The applicant shall be conditioned to acquire the right-of-way and complete the improvements prior to Certificate of Occupancy of the first building. This should be reflected in the DEIR.
30. Page 4.2-46 states that all of the cumulative mitigation measures are identical to or consistent with area improvements described in the City of Agoura Hills General Plan EIR. This is incorrect. The General Plan does not indicate any changes to Chesebro Road at the eastbound freeway ramps, nor does it show widening of Chesebro Road from the freeway ramps to Palo Comado Canyon Road. Additionally, the proposed roundabout does align with the proposed future widening needs for Palo Comado bridge widening as shown in the City's General Plan.
31. This section needs to address potential impacts from implementation of the proposed mitigation measures. For example, traffic signals in close proximity to one another would likely precipitate queuing of vehicles, thereby impeding the traffic flow. Signalizing intersections in close proximity would also likely lead to potentially conflicting signals and perhaps create safety concerns.
32. This section needs to analyze the impacts on traffic and parking of special events, as described in Section 2.0 Project Description (see also General Comment #2). Page 4.2-37, 1st paragraph under "Parking and Access," notes that the parking supply will be sufficient to meet the daily demands of faculty, staff and visitors, in addition to special events. However, there is no data to substantiate this conclusion. The DEIR should analyze the project demand for parking for each type of use (identifying the demand factors), assess the impacts accordingly, and recommend appropriate mitigation measures. For example, to manage special events, mitigation measures could include retaining special event personnel to direct traffic flow or there could be off-site, remote parking with a shuttle system to the campus. Also, special events should be required to be scheduled during non-peak traffic periods and to avoid conflicting with other large events in the area.
33. Aside from the traffic roadway and intersection improvements proposed as mitigation, the project should further aim to reduce the number of vehicle trips generated by the school. Other feasible mitigation measures that should be required and outlined in the DEIR include a strong incentive, not just voluntary, program to promote carpooling of students and staff. Also, the hours of the school should be staggered with Agoura High School to minimize the number of vehicles in area intersections during peak traffic hours.
34. Finally, as stated in our previous comments, the applicant should pay the City's Traffic Impact Fee (TIF) based on traffic generation rates. This fee is estimated at \$1.75 million based on a City standard rate of \$2440/per peak hour trip. This should be identified in the DEIR.

Section 4.3 Noise

35. Page 4.3-18, Mitigation Measure 4.3-3: This measure states that construction truck traffic shall avoid residential areas and other sensitive receptors to the extent feasible. The text should note which residential streets are being referred to, and possible alternate haul routes. Some of these roads, such as Chesebro, are narrow country roads unsuitable for carrying dump trucks. Given the site location and access, and surrounding roadway network, it would be feasible to avoid residential areas. Therefore, this measure should be revised to delete the last phrase "to the extent feasible." The possibility of utilizing residential roadways should not be an option.
36. Page 4.3-20, 2nd paragraph: This text refers to parking lot associated noise. The text states that "these noise levels occur intermittently and are no different from noise already occurring on the streets, driveways, and parking area that exists in the adjacent community." While the *types* of noise generated might be similar, the noise from this project would increase the ambient noise level by adding additional uses. Moreover, the project would add a large parking lot in close proximity to existing residences, which has the potential to be more disruptive than simply adding to ambient noise levels in the area. The DEIR needs to assess the incremental impact of the parking lot noise.
37. As noted in General Comment #2, this section does not adequately analyze potential noise impacts from athletic events, and other cultural or special events that are noted in Section 2.0 Project Description (pages 2.0-2 and 2.0-9 through -10) as potentially occurring. A more detailed discussion of the range of possible events, including maximum attendance, as well as impacts and mitigation measures, needs to be provided. Mitigation measures could include limiting the number of attendees at events, limiting the frequency of special events, or incorporating other specific noise attenuation measures into certain events. Page 4.3-20, 3rd paragraph, notes that "noise would be generated during scheduled events such as graduation night, back to school night, or on parent teacher conferences. Such noise would be an annoyance but is not considered a significant impact given that these noise levels are not expected to exceed 45 dB(A) for a cumulative period of 30 minutes in one hour." This text does not address other special recreational or cultural events, nor does it substantiate why the noise levels would not exceed the standard. More specific data needs to be provided.
38. Besides bells/buzzers, would there be a loudspeaker/public announcement system at the school? In particular, would there be such a system for the outdoor athletic events? If so, the DEIR should analyze potential noise impacts from this system and propose mitigation measures as necessary.

Section 4.5 Biological Resources

39. Page 4.5-2, last paragraph and page 4.5-47: This text states that the last focused on-site surveys of the California gnatcatcher were conducted in June 1998. The table on page 4.5-19 notes that the species was “not detected during focused surveys.” Given that any data collected is now over five years old, a more recent survey seems appropriate in order to accurately estimate the potential for this species to be located on or adjacent to the project site, even though the text notes on pages 4.5-25 and 4.5-47 that USFWS staff indicated in 2003 that no additional focused surveys are required.
40. Page 4.5-3, 1st paragraph: The report describes using Holland (1986) as the source for vegetative classification. We suggest that the more recent Manual of California Vegetation (1995) be utilized instead.
41. Page 4.5-36, last sentence of 1st paragraph: The loss of nesting species is noted as being a potentially significant impact. However, the discussion of Mitigation Measures on this same page states that the project would not result in significant impacts to any special status animal. It appears that the potentially significant impact is related to possible disturbance of species during nesting season. Therefore, the mitigation measures applying to this impact should be required, not simply recommended.
42. Page 4.5-40, Item 3 Analysis and pages 4.5-49 through -50: The text notes that seven drainage features on-site may be considered regulatory jurisdiction of the ACOE, CDFG, RWQCB and NRCS. However, no jurisdictional delineation of the resources has yet been conducted. To sufficiently determine the extent of project impacts, the jurisdictional analysis needs to be conducted as part of the DEIR. Additionally, potential impacts from mitigation of any such habitat needs to be assessed in the DEIR, particularly if valuable but non-wetland habitats are replaced by wetland habitats. We understand that a final mitigation plan cannot be provided as part of the DEIR, given that regulatory agency review and approval would occur after the CEQA analysis. However, an assessment of potential impacts to wetlands could and should be provided as part of the DEIR, along with a preliminary estimate of possible mitigation approaches. As presented, the analysis provided in the DEIR is too open-ended, especially considering that many of the concerns can be assessed and addressed at this time.

Section 4.6 Geotechnical

43. Pages 4.6-15 to -16: The text states that the access road off of Canwood Street would require a slope height of up to 50 feet. This violates the County’s Ridgeline Protection Ordinance. The cuts would also violate the Ordinance’s provision of structures to occur 50 feet vertical feet below any significant ridgeline. Notwithstanding the visual impacts of these slopes, would a variance approval be required to violate the County’s Ridgeline Protection Ordinance?

44. Page 4.6-15: The text states that maximum cut slopes of 60 feet and maximum fill slopes of 20 feet are proposed, and acknowledges that such cuts and fills are not consistent with the NAP. It further states that the 50-foot slope at the back of the development is "largely not visible from public view." Is this because it would be screened by the buildings? Since the majority of the grading is to be completed during Phase I and the construction of the buildings occur in later phases, would not the 50-foot high cut slope be visible until such time as the buildings are completed in a later phase? Please clarify this in the DEIR.

Section 4.7 Fire Services and Hazards

45. The DEIR should mention that Los Angeles County Fire Station No. 89 is currently under construction at 29575 Canwood Street in Agoura Hills. This new fire station, located approximately 1.75 miles from the subject site, is scheduled to be operational in 2006.
46. Pages 4.7-10 through -11 describe the "shelter in place" facility. However, there is no indication where this building would be located on-site and what the building design would look like as viewed from outside. More information regarding the shelter needs to be provided. This is similar to General Comment #1, where it is important for the DEIR to clearly enumerate the proposed improvements/development by phase and provide details accordingly.
47. Figure 4.7-2 indicates an alternate emergency evacuation route at the northerly edge of the site, which would outlet to Chesebro Road. The DEIR should stipulate that this is an emergency access only, and would not be available for use during regular school activities or special events. The DEIR should note the method to be used to limit this access during non-emergency events (e.g., gate) Otherwise, there would likely be significant traffic issues associated with the access, which would need to be analyzed in the DEIR.

Section 4.9 Hydrology and Water Quality

48. Page 4.9-10, 2nd full paragraph: The text notes that the majority of runoff leaving the developed portion of the site will be collected, detained, and released at a controlled rate to the Chesebro Channel. The DEIR does not explain how this will be accomplished. A discussion of these methods should be provided in the DEIR. Additionally, while water quality issues would be addressed as part of the NPDES permit, the project represents an ideal opportunity to incorporate biofilter mechanisms/bioswale (e.g., vegetated swales) into the drainage system before the runoff is carried offsite. The western portion of the project site is already proposed for revegetation, so a biofilter would be consistent with this approach, and will also be more in keeping with the natural character of the area. The biofilter/bioswale would provide a natural means of reducing potential pollutants from the site, and

should be identified as part of the project in the DEIR. Such a system could assist in the project meeting NAP Water Quality policies IV-19 and IV-22.

Section 5.0 Alternatives

49. Page 5.0-3, Alternative 1 – No Project: The subheading states, “Development Consistent with Existing Land Use Designations.” However, the discussion really pertains to leaving the project site in its current state – no development – which is not the same as developing the site under the current zoning/land use designation, which seems to be the subject of Alternative 2. Please clarify.
50. Page 5.0-4, 3rd paragraph: The text states that the proposed project is superior to Alternative 2 – Subdivision with regard to aesthetic impacts, noting that “given the current market conditions and trends in residential construction in the area, it is likely that these homes would be larger in mass and scale as compared to existing residences along the western site boundary.” This may not actually be the case. Residential development, including subdivision layout, if consistent with the NAP and the Old Agoura Overlay District, could be compatible with adjacent residential development, and therefore be aesthetically environmentally superior to the proposed project. Therefore, this discussion needs to be clarified and further researched. In particular, note Policies VI-13 through VI-16 of the NAP stipulating that development be compatible with existing and planned development; provide a transition to surrounding development; limit heights to ensure compatibility with the surrounding setting; and restrict total building square footage and grading to a size that maintains the area’s open character. Moreover, Figure 5.0-1 shows a conventional subdivision design. This alternative could easily demonstrate a layout more compatible with the existing natural setting. Also, there would likely not be a need for the road off of Canwood, rather access for the 13 homes could be taken off Chesebro Road, thereby reducing access impacts. These minor and feasible changes to Alternative 2, which would make the alternative much more preferable from an environmental standpoint, should be addressed in the DEIR.
51. Page 5.0-15, Alternative 4 – Reduced Development Intensity: This alternative proposes that the school structures be limited to one-story in height, accommodate about one-half of the proposed student population, with the proposed auditorium, dedicated library building and separate athletic/play field removed. While environmentally superior, the DEIR notes that this alternative does not meet the project objectives, namely that it would not accommodate the projected student population growth. However, the DEIR does not describe the projected student population growth or what data the projections are based on. This information needs to be provided in the DEIR. The applicant lists a series of objectives that are laudable in attempting to provide a high quality school and facility. However, could not these objectives reasonably be met at a certain lower level of occupancy and intensity of use that does not result in as high an environmental impact on the community? For example, perhaps the student population aimed for could be somewhere between the proposed project’s 750 (847 students and staff) and

Alternative 4's 472 students? Additionally, what is the basis for determining whether the proposed project or Alternative 4 sufficiently provides an "opportunity for public and private youth oriented recreational activity and a community meeting facility? Could not a scaled back development also provide good recreational and community facilities? It seems as though the project objectives reiterated here, and discussed in more detail in Section 2.0, are written such that only a large, state of the art set of facilities would be acceptable. Given that such a project (the proposed project) has several significant environmental impacts that can be substantially reduced or in some cases eliminated with a less intense project, this alternative deserves to be explored further.

52. Page 5.0-21 – 23, including Tables 5.0-1 and -2: The traffic impact analysis seems to compare Alternative 5 – Alternate Means of Access with the No Project Alternative, concluding that the impacts of Alternative 5 are greater than for the No Project. Rather, the DEIR should compare Alternative 5 with the proposed project for a more accurate and useful traffic analysis comparing project alternatives. Please correct and/or clarify this section.

Thank you again for the opportunity to comment on this DEIR for the Heschel School. The City of Agoura Hills looks forward to reviewing the responses to our comments. If you have any questions, please contact Allison Cook, Senior Planner, of my staff at (818) 597-7310.

Sincerely,



Mike Kamino
Planning and Community Development Director

Cc: Greg Ramirez, City Manager
Jim Thorsen, Assistant City Manager