



RDEIR REPORT REVIEW - COMMENTARY

The following are intended to serve as comments regarding WEXCO's observations of the Recirculated Draft Environmental Impact Report (RDEIR) relative to the Harvard-Westlake Parking Improvement Plan, as of **March 16, 2016**, based on the information available to date. The format of this document is: 1) an excerpt of the RDEIR including page/section number, 2) WEXCO's Relevant Summary of the RDEIR provision, 3) WEXCO's comment as to the RDEIR proposal.

1. RDEIR, Executive Summary (S-3 TO S-4)

Pedestrian Bridge The Proposed Project also includes a pedestrian bridge crossing over Coldwater Canyon Avenue that would connect the proposed Parking Structure to the Harvard-Westlake Campus. The proposed pedestrian bridge would allow for safe crossing between the Parking Structure and the Harvard-Westlake Campus without stopping vehicles traveling along Coldwater Canyon Avenue. ***For safety reasons associated with the danger of speeding vehicles currently traveling along Coldwater Canyon Avenue, no pedestrian access to the Development Site would be provided from the street.*** The pedestrian bridge would be fully accessible in compliance with the requirements of the Americans with Disabilities Act..

The proposed Parking Structure would be used for parking purposes only... no student drop-off and pickup operations permitted...

Relevant Summary

For Safety Reasons, no Pedestrian Access to - or from - the Parking Structure is provided to / from Coldwater Canyon. The only safe and ADA Compliant access to/from Coldwater Canyon is via the Bridge.

WEXCO Commentary

Since there is no pedestrian access in/out of the Parking Structure to Coldwater Canyon (but for the Bridge), that limited access is unsafe.

To the extent that a new and improved pedestrian access to/from Coldwater Canyon (beyond the Bridge) is permitted/designed/built, such access would be dangerous.

In the event of a fire, or earthquake, or other emergency situation or calamity that would require an accessible path to a safe zone outside the Parking / Practice Field Structure, the existing plan is unsafe. In the existing plan, the only outlet to the Parking / Practice Field Structure is either a bridge to the other side of Coldwater Canyon or directly out to Coldwater Canyon at grade.

The planners recognize that access to Coldwater Canyon at grade is "associated with the danger of speeding vehicles".

There is no guarantee that pedestrians travelling to / from the Parking Structure / Harvard Westlake Campus will refrain from illegally crossing Coldwater Canyon - short of building a complete fence - with automatic gates) along the parkways (on either side of Coldwater Canyon). Building a complete fence and gate system along the parkways is also unsafe and impractical.

To the extent that pedestrian access, in/out of the Parking Structure to cross Coldwater Canyon at street level is provided (e.g. Crosswalk) that type of access is also unsafe.

A crosswalk (between HW and the Parking Structure) that presumably is solely serving the 750 parking lot spaces of the Parking Structure and Harvard Westlake Campus - during peak and off peak hours - would be dangerous. The increase in pedestrian travel on Coldwater Canyon (with or without the bridge), from the Parking Structure to Harvard Westlake increases the likelihood of a collision, injury and/or fatality.

The Pedestrian Bridge is an attractive nuisance that may result in persons that use the Bridge dropping items onto Coldwater Canyon vehicular traffic.

Items dropped or that fall (intentionally or unintentionally) from overpasses or bridges is not uncommon. The pedestrian bridge (even with the proposed design scheme - that allegedly reduces the likelihood of debris falling upon vehicles on Coldwater) will increase the likelihood of such a dangerous condition.

2. **RDEIR, Executive Summary (S-3)**

The Proposed Project would also relocate school bus loading and unloading from Coldwater Canyon Avenue to within the Harvard-Westlake Campus, and eliminate the use of local streets by students and visitors for parking for all but the biggest special events, such as graduation and homecoming.

Relevant Summary

The Project will virtually eliminate Campus Parking on the local streets.

WEXCO Commentary

There is no guarantee that persons using local streets to park and walk upon will be eliminated by the Project.

There is no guarantee that persons using local streets to park and walk upon will be eliminated by the Project, short of installing No Parking Signs (or Permitted Parking strictly for Residents) and the strict enforcement and towing of offending vehicles away from the local streets.

The RDEIR admits that even with the 750-space Parking Structure, the Campus will still have large events where neighborhood parking is inevitable.

The large events will still have visitors using local streets for driving, parking and pedestrian uses.

3. **RDEIR, Executive Summary (S-4)**

The pedestrian bridge would be secured when the Harvard-Westlake School is closed to prevent unauthorized access to the pedestrian bridge.

Relevant Summary

The Bridge will only be secured while Campus is closed.

WEXCO Commentary

If the Proposed Bridge is built, it should be secured at all times.

To the extent the Bridge is approved... Access should be secured at all times given the dangerous nature of the bridge on at least two (2) levels (Dangerous limited access across Coldwater and the Attractive Nuisance that the Bridge brings danger to the vehicular traffic below)

4. **RDEIR, Executive Summary (S-5)**

Debris Basin & Deflection Walls - A debris basin is proposed to be located in the southwest corner of the Development Site. The debris basin would be earthen material. The debris basin would be surrounded by trees (within the newly landscaped area) that would be a mix of native vegetation (oaks) and other landscape trees. Its purpose is to collect and discharge water or other surficial runoff, such as might occur during a heavy rain event, from the hillside areas to the south and west. Similarly, ten deflection walls are also proposed (average length of 13 feet and ranging in height from 18 inches to three feet) on the northwest side of the Development Site. They would be installed along a 30-degree angle to the adjacent ascending topography and would deflect surficial runoff into a downstream debris channel to maintain positive flow.

Relevant Summary

Debris Basin design does not include Maintenance provision or scope.

WEXCO Commentary

Lack of Debris Basin Maintenance Program in the RDEIR

WEXCO has not seen, in the RDEIR, any provision as to how or when the debris basin is to be maintained. Lack of maintenance of a debris basin may subject the area to standing water, and vector hazards (e.g. Mosquitoes, Vermin).

5. **RDEIR, Executive Summary (S-9)**

A maximum grading quantity of approximately 2,500 cubic yards in a Hillside Area on a lot in the RE40-1-H Zone, in lieu of the 1,600 cubic yard maximum grading limit otherwise required by LAMC Section 12.21 C.10(f)(1), (or such amount as may be increased pursuant to LAMC Sections 12.21 C.10(f)(3) and (4). (The Project would involve grading and export of a total of 137,000 cubic yards [to be conservative 140,000 cubic yards is analyzed in the RDEIR]...

Relevant Summary

140,000 Cubic Yards of soil are "conservatively" estimated to be exported.

WEXCO Commentary

The RDEIR does not indicate any Swell Calculation of the Export soils.

Swell of compacted soil - as it is being excavated and placed into dump / haul trucks - is commonly estimated to be between 20%-25%. The amount of anticipated haulage of Export is misleading.

In other words, the Proposed excavation amount of 140,000 Cubic Yards of compacted earth materials will increase in size by 20%-25% as it is distributed from the earth to the dump trucks; thereby increasing the amount of haulage of earth materials from the 140,000 CY to 175,000 CY (i.e. 25% Swell Factor).

The RDEIR does not indicate the weights of various construction elements that will impact the Roads and Infrastructure

WEXCO has not seen, in the RDEIR, any calculations as to the weight of:

Imported soils to the Site.

Imported Concrete to the Site.

The RDEIR states that it assumes 100 Concrete Trucks per day during the Project, but the amount (in Cubic Yardage - CY) of concrete is not included.

Imported Steel and Reinforcing Steel to the Site.

Heavy Equipment transported to/from the site.

... and other substantive Construction Equipment and Materials.

6A. RDEIR, Executive Summary (S-33)

Truck trips, Monday through Friday, would occur as follows:

8:00 a.m. to 9:00 a.m. limited incidental deliveries (i.e., one or two for cement, supplies); [2 / day]

9:00 a.m. to 10:00 a.m. up to 6 trucks (12 truck trips); [6 / day]

10:00 a.m. to 2:00 p.m. up to 14 trucks per hour (28 truck trips per hour); [56 Trucks / Day]

2:00 p.m. to 3:00 p.m. up to 12 trucks (24 truck trips); [12 / day]

3:00 p.m. to 4:00 p.m. up to 6 trucks (12 truck trips). [6 / day]

(CONTINUED)

6B. RDEIR, 2. Project Description (2-15)

The Harvard-Westlake School's current hours of operation are as follows:

- Monday - Friday: 6:30 am - 11:30 pm;*
- Classroom hours are 8:00 am – 3:10 pm on Monday*
- Classroom hours are 8:00 am – 2:35 pm Tuesday through Friday*
- Some Weekends (Saturday and Sunday): 6:30 am - 11:30 pm*

The Harvard-Westlake Campus would continue to operate these same hours with the Project.

6C. RDEIR, 3.2 Air Quality and Greenhouse Gas (3.2 - 26-27)

It is anticipated that construction activity would begin June 2016 and occur over 30 months. The phases include Grading (234 days), Soil Nailing (234 days), Shotcrete (234 days), Foundation/Structure (338 days) Tower/Ramp Construction (130 days), Sitework (156 days), Streetwork (26 days), and Pedestrian Bridge (104 days)

Key Assumptions...

- *200 CY of Demolition debris*
- **140,000 CY Excavated material**
- **144 Truck Trips per day for Hauling Excavated Material**
- *3.5 acres of land disturbed per day*
- **100 Concrete Truck Trips per Day**
- *15,000 SF of paving*

6D. RDEIR, 3.8 Transportation, Circulation and Parking (3.8 - 13-27)

Assumptions...

- *33 Construction workers on-site during Grading - using their own vehicles - 66 Vehicle Trips*
- **Dump Truck Capacity = 20 CY, but only filled to 14 CY**
- **During Peak Hours 160 Truck Trips per day for Hauling Excavated Material (Not 144 See 7C)**

Relevant Summary

*The total proposed trucks per day = 2 + 6 + 56 + 12 + 6, is equal to 82 Trucks per day (throughout the project). Truck trips are double that figure (i.e. incoming and outgoing truck trips) equal to 164 Truck Trips per day (throughout the Project duration). Harvard Westlake assumes during excavation alone that there will be 144 Dump Truck Trips per day. The number of vehicles used to transport persons to/from the Campus that "**would continue to operate**" is not provided in the RDEIR and will remain unimpeded during construction, and will add to the ordinary Commuter Traffic along Coldwater Canyon. Dump Trucks will exit site, cross Coldwater, travel north to US 101 and deposit materials 35 miles away.*

WEXCO Commentary

The RDEIR underestimates the Impact of the Construction Activities of the Proposed Project

During Excavation and Export of soils, from the site, it is proposed that 20-CY Capacity Dump Trucks filled to 14 CY each, (equal to 164 Truck Trips -

with a GVWR of 65,000 lbs or 32 Tons each) per day will haul (export) 175,000 CY of soil (Not 144,000 CY as indicated).

As indicated in the Proposed Schedule, it will take approximately 234 working days (Monday - through Friday) - not including Rainy Days (Rain in excess of .25") or Windy Days (Wind in excess of 25 MPH) to Haul 175,000 CY.

Based on historic weather data (i.e. 2011) there is approximately 23 days of inclement weather (14 Rain Days / 9 Windy Days) during a calendar year.

Based on the proposed use of 164 Truck Trips / Day (to haul 175,000 CY of Export Soil) and the schedule of 234 days to complete the proposed hauling of Export soils. The addition of 23 Days, for inclement weather, to the 234 days to export soils will increase the time to Export Soils to 257 work days.

In total, 257 Work days is equal to (at least) 360 calendar days (1 Year) to accomplish the Export of Soils from the Site. This does not include many other construction related Hauling routines attributed to the Project including: Soils Import Hauling, Rebar Hauling, Structural Steel Hauling, Concrete Hauling, Shoring Hauling, and other Construction Materials Hauling / Trucking.

This also does not include Construction Delays or Extraordinary Weather related delays.

Based on the Proposed Schedule Start Date of the Project of June 1, 2016 the Excavation portion of the project alone will not be completed until End of May, 2017... nearly a full year of Excavation alone is forecast.

Based on the proposed 14 CY Dump Loads, it will take 12,500 Dump Truck Loads (or 25,000 Truck Trips) to Export the Soil from the site, across Coldwater Canyon (a dangerous maneuver in and of itself), travel north along Coldwater Canyon to US 101 to an undisclosed site that is 35 miles away.

Each loaded Dump Truck weighs about 65,000 lbs. or 32 Tons. The amount of Tonnage applied to the road and onto the infrastructure below the road (Sewer Lines, Water Lines, Utility lines) is on the order 25,000 Truck Trips x 32 Tons = 800,000 Tons for nearly a year.

The 800,000 Tons over the course of one year does not include the following:

- Import of Soils
- Concrete Deliveries
- Rebar or Steel deliveries
- Other Construction Materials Deliveries
- Heavy Equipment Delivery/Removal

Campus/Commuter Vehicle Traffic
Construction and Emergency vehicles for others

The Proposed Construction Schedule included in the RDEIR that forecasts the number of days is unclear as to Calendar Days or Working Days for the proposed Project.

The impact of the construction and the associated truck loads on the streets and sidewalks and utilities (Improvements) and to those that are served by these Improvement is hazardous.

The result of the Project Construction activity, attributed to the Subject Project, on the Streets will cause premature aging and damage to the roads and sidewalks and infrastructure. Damaged roadways and sidewalks often lead to Vehicle, Bicycle and Pedestrian Accidents. Damaged Infrastructure causes damage to Property and Life and Limb.

There is no provision in the RDEIR as to where worker vehicles will be designated to travel and / or park at the project.

To the extent that worker parking is off-site, there is no provision or plan as to how workers will get to/from the project.

7. **RDEIR, 2. Project Description (2-9)**

Enhance safety and security associated with vehicular and pedestrian circulation on the Harvard-Westlake Campus and in the surrounding area, including the relocation of:

- *Cars that currently park off-campus along Coldwater Canyon Avenue and neighboring streets, and*
- *School bus drop-off/pick-up operations on-site.*

Relevant Summary

Safety of Harvard-Westlake Community Associated with Vehicular and Pedestrian Circulation (Students, Employees, Parents, Visitors)

WEXCO Commentary

A viable solution for pedestrian travel on the East side of Coldwater Canyon is to build a sidewalk.

To the extent that the City determines that Harvard-Westlake students, and visitors, walking South on Coldwater on the East side of Coldwater (from Halkirk Street to the Campus) have a degree of safety risk (such that temporary cones

are placed along the shoulder fronting the associated residence), the proper solution is to seek an easement along that portion of the ~100' distance of Coldwater Canyon from the intersection of Halkirk Ave and Coldwater Canyon southbound to the North/Visitor entrance of the school. (*See attached imagery from Google Earth*)

If the area between Halkirk Street and the Campus North/Visitor Entrance were made into a sidewalk, it would further ensure the safety of any pedestrian traffic from the residential streets to the campus (or to other southerly destinations). Even without the paved sidewalk alternative, there is currently ample room for pedestrians to walk safely southbound to the campus on the east side of Coldwater Canyon.

Unlike the Parking Structure project that places students, employees and visitors in harms way (i.e. crossing Coldwater Canyon), the alternative is to keep pedestrians on the east side of Coldwater Canyon, where the campus community and all its activities currently are, thereby keeping pedestrians safe. Further, if necessary, the School could improve the pavement that currently exists on the east side of Coldwater (between the North/Visitor Entrance up to the Main entrance - a distance of ~480').

The current Bus/Pedestrian Drop Off System is Safe

School bus parking on Coldwater is currently safe as well. Students load and unload again on the east side of Coldwater with a wide margin away from the flow of traffic (12 ft+). Students are safely dropped off onto sidewalks in front of the school - near the Main Entrance, and walk safely into campus at grade. There is absolutely no need to move bus loading and unloading within the campus.

There is no legitimate safety argument for moving the campus community (i.e. students, employees and visitors) across Coldwater Canyon to the West so that they must travel eastward across Coldwater Canyon at risk.

8. RDEIR, 2. Project Description (2-29)

The Ground Level Site Plan (Figure 2-7)

WEXCO Commentary

The lack of a designated shoulder is a safety hazard.

The Proposed Plan does not include a Shoulder on the west or east sides of Coldwater Canyon. Especially in light of an increase of 750 vehicles that are attributed to the Parking Structure alone, the lack of a designated shoulder is a safety hazard.

To the extent that a Shoulder is designed/constructed on the west side of Coldwater Canyon at the Parking Structure, it may be construed by Campus persons as a means to drop-off persons (to cross Coldwater Canyon to the

Campus or to gain access to the proposed Bridge) and/or use the shoulder as a sidewalk - which has been determined to be dangerous (see also S3-S4) due to "speeding" vehicles.

9. **RDEIR, 2. Project Description (2-10)**

The catchment fence (32 feet tall), proposed around the perimeter and on top of the practice field would ensure that loose balls do not affect vehicles driving on Coldwater Canyon Avenue.

Relevant Summary

The 32' high Catchment Fence will stop balls from entering Coldwater Canyon Blvd.

WEXCO Commentary

We have not seen a Trajectory Study, in the RDEIR, to substantiate the proposed design of a 32' high catchment fence that will stop errant (or purposefully projected) balls from entering Coldwater Canyon.

The RDEIR does not include the details of the athletic activities associated with the proposed athletic practice field (Field Hockey, Lacrosse, Football, Soccer, etc.).

To ensure that no errant or purposefully projected ball or equipment exits the proposed Practice Field, it is suggested that the Practice Field be fully netted (i.e. netted at the sides and the top of the proposed Practice Field).

If you have any questions with the content of this document, please contact the undersigned at (310) 306-3877. This report is subject to further amendments subsequent to receipt of any new additional documents.

Cordially,

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