

FEIR REPORT REVIEW – COMMENTARY

August 3, 2017

The following are intended to serve as preliminary comments regarding WEXCO's observations of the Final Environmental Impact Report (FEIR) relative to the Harvard-Westlake Parking Improvement Plan, as of **August 3, 2017** based on the information available to date. This document does not serve as WEXCO's final analysis, and in no way, do the following constitute all WEXCO's comments regarding this matter. The FEIR responses, to WEXCO's 3/16/16, begin on page 3-493 in the FEIR. WEXCO's responses are not limited to those Responses to Comments found in the FEIR relative to WEXCO's comments.

The format of this document is: 1) an excerpt of the JUNE 2017 FEIR including FEIR Response number and page number, 2) WEXCO's comment as to the FEIR response.

1. FEIR, 9.6R-14 Response (Page 3-475)

...Harvard-Westlake acknowledges the inherent danger of pedestrians, including young children, walking along roadways without physical separation from moving vehicles... Harvard-Westlake and the community have been fortunate with regard to the history of accidents in the area...

WEXCO Comment: The solution to any potential current pedestrian safety hazard are construction of a sidewalk, barricades, cones or bollards and not in creating another hazard by directing pedestrians across the Canyon Roadway... or, creating yet another hazard by building a Parking Structure (hereinafter "Parking Structure"), and associated Bridge across the Canyon Roadway, to encourage / enhance the likelihood of Jaywalking across Coldwater Canyon roadway (hereinafter "Canyon Roadway") and the resultant likelihood of injury or death.

The FEIR does not address the facts that - even if their Plan is built – the:

HW Cross Country Team routinely uses the Canyon roadway; Planned and Unplanned Visitors to the Campus use the Canyon Roadway; and, HW Students (and Faculty/Personnel) use the Canyon Roadway during their Lunch / After School Hours - these activities are not reconciled in the FEIR.

Creating a sidewalk; construction of a barricade; or, bollards or cones near the North Entrance of the Campus is a cost effective and safe alternative that will prevent or guard against any potential pedestrian hazards along Coldwater Canyon.

Currently, campus visitors, employees and students do not cross Coldwater Canyon in front of the campus to access the campus. There is no doubt that the proposed improvement will increase the likelihood of pedestrians dangerously crossing the Canyon Roadway. This danger will increase at night (as proposed Parking Structure operations are until 11:30 p.m.) due to poorer visibility.

2. **FEIR, D-66 Response (Page 3-109)**

... pedestrian bridge, which provides the most direct, expedient (i.e., not having to wait for a traffic signal to change), and safest opportunity for pedestrians to cross Coldwater Canyon Avenue.

WEXCO Comment: Disagree. To the extent a Parking Structure is constructed, the associated Bridge may be the safest way for a pedestrian to cross, but that does not eliminate the hazard of pedestrians using the at-grade route. A Parking Structure - serving a school - across a Canyon Roadway is neither the safest nor most efficient alternate.

...the Project proposes signage prohibiting at-grade pedestrian crossings,

... decorative landscaping (e.g., bushes) and pedestrian barriers will be installed at all corners of the intersection

... and no crosswalk striping will be provided at the intersection.

WEXCO Comment: Signs, Warnings, Striping and Bushes do not ensure compliance. Pedestrians routinely bypass bushes and/or ignore signs to short cut their path of travel. The Parking Structure near the Campus Entrance across the Canyon Roadway will encourage pedestrians to Jaywalk across the Canyon Roadway, hence the reason this project is unsafe.

...the first level of parking will be prohibited to students and will be reserved for employees only.

WEXCO Comment: Does this response imply it is acceptable to allow HW employees and visitors (instead of students) direct access to the at-grade hazard? What prevents students from accessing the parking lot at-grade from the 2nd and subsequent levels? What prevents vehicles/pasengers to drop-off / pick-up persons inside the Parking Structure and then exit?

...the Parking Structure will contain a security office (RDEIR page 2-1), which will be used to monitor and control at-grade crossing.

WEXCO Comment: There is no indication as to how the "Security Office" will monitor and control at-grade crossing. How does the Security Office control at-grade crossings? What method of control?

...design elements of the Project mitigate any potential safety impacts for at-grade crossing and the assertion in the comment that the Project will cause safety impacts to students is not substantiated.

WEXCO Comment: HW has acknowledged safety impacts in the Design. WEXCO agrees, that the design not only partially mitigates against the hazard, it also creates the necessity of Hazard Mitigation. There are many safety hazards implicit in the Design that were addressed in our March 16, 2016 commentary:

At-grade drop-off or pick-up of students / visitors / faculty / employees that are inevitable in the Parking Structure as designed.

Risks to at-grade parking users such as faculty / staff / visitors / employees that have authorized - or gain - access to the at-grade lot.

... and others

3. **FEIR, 9.9R-2 Response (Page 3-494) (with reference to D-66 Response, page 3-109)**

The parking structure will contain a security office which will be used to monitor and control at-grade crossing...

WEXCO Comment: There is no indication as to how the Security Office will Monitor and Control at-grade crossing. There is no indication as to how the "Security Office" will Monitor and Control at-grade crossing. How does the Office control at-grade crossings? What method of control?

4. **FEIR, 9.9R-3 Response (Page 3-495)**

The RDEIR, in multiple locations, acknowledges the unsafe conditions and traffic delays that a crosswalk or other at-grade pedestrian crossings would introduce.

WEXCO Comment: Once again, the unsafe conditions are acknowledged relative to at-grade crossing. The simplest solution to avoiding: unsafe conditions; traffic delays; traffic hazards; construction safety issues; from at-grade crossings is to keep the students, faculty and staff on the East side of Coldwater on the School's existing campus footprint.

5. **FEIR, 9.9R-4 Response (Page 3-495)**

The mesh screening is visible in RDEIR It is also noted that the Parking Structure will contain a security office... used to monitor and control at-grade crossing...

WEXCO Comment: The Security Office will not only monitor and control at-grade crossing... it will also monitor and control the Bridge... what other security / safety issues will the Security Office "monitor and control"? How many officers will there be? What are there functions?

6. **FEIR, 9.9R-5 Response (Page 3-495 to 496)**

Re: Correction and Addition item Project Design Feature (PDF) TR-4 "Harvard-Westlake shall post a security guard at the northern Campus driveway who shall deny entry to students who attempt to walk onto Campus, unless the student rides public transportation, uses a bicycle or similar mode of transportation, and/or walks to Campus from his or her residence (such students shall be provided identification to verify permission to walk on Campus)."

WEXCO Comment: In order for the proposed Project Design Feature (PDF) to work, HW would have to issue identification to all students, visitors, personnel, faculty and employees. Similarly, the Cross-Country Team would be disallowed from jogging along Coldwater Canyon. As a condition of this design feature, the school must disallow any student from leaving campus on foot, unless they meet the listed criteria. There is no other way to eliminate the potential risk associated with students on foot North of the campus unless HW creates sidewalks, barricades, bollards or cones as listed in #1 above - which would preclude the necessity of moving the parking across the Canyon Roadway into the proposed Parking Structure. This Parking Structure design creates more vehicle traffic in the area during (for example, lunch time) as students must be directed to cross Coldwater Canyon on the bridge, then drive (not walk) to nearby businesses/eateries, rather than walking, which is an environmentally inferior

result. Additionally, the FEIR does not address the issue WEXCO raised regarding the installation of No Parking or Permit Only Parking Signs once the proposed Plan is implemented. Finally, HW project planners note that there will still be visitors that will use neighborhood streets for parking on event days. The north Campus access issue will remain even after the proposed project is built. And the at-grade crossing / jaywalking deadly hazard will be created by the project.

RDEIR page S-2 also states that all student drop-offs and pick-ups would occur on the Campus (not on the Development Site, as such term is defined in the RDEIR).

WEXCO Comment: To avoid the on-campus drop-off/pick-up traffic, motorists will use the Parking Structure – or, continue to use residential streets -- to avoid the back up. People will use the Parking Structure to drop-off especially in light of the fact that the Parking Structure will not have a secured gate entry.

There is no guarantee that all student drop-off and pick-ups will occur on the Campus as designed. For example, southbound traffic will likely use the Parking Structure itself (or the Dedicated area adjacent to the Structure) to Drop-Off/Pick-Up Campus users.

The Bridge will attract drop-offs / pick-ups and as such the risks of at-grade crossing remains to those students that are dropped off (or picked up) at the proposed Parking Structure.

There is a risk of injury to pedestrians that are dropped-off / picked-up inside the Parking Structure with the traffic inside the structure itself.

There is a risk to pedestrians that are dropped-off / picked-up outside the Parking Structure at the southbound side of the Canyon Roadway at the 15' dedicated area adjacent to the Parking Structure. (see FEIR, D-63 & 64 (Pages 3-107 to 108) and WEXCO response # 15)

7. FEIR, 9.9R-6 Response (Page 3-496)

WEXCO March 2016 Comment: Large events will still have visitors using local streets for driving, parking and pedestrian uses... and FEIR response: "...the Project is not intended to remove all Harvard-Westlake parking on neighborhood streets for all events and on all days."

WEXCO Comment: Therefore, HW acknowledges that the Project does not eliminate the risk. Use of the Parking Structure, on such events, increase the risks of injury or death due to the high risk of pedestrians crossing the Canyon Roadway. Visitors, not familiar with the Bridge, are particularly at risk under these conditions.

Many of the large events are at night, increasing risks to pedestrians that elect to cross the Canyon Roadway at-grade.

8. **FEIR, 9.9R-10 Response (Page 3-498)**

“...the potential impact Project vehicles will have... the city will impose ... conditions... to require Harvard-Westlake to repair any damage to public property...”

WEXCO Comment: What provisions has HW made to repair damages to private property?

9. **FEIR, 9.9R-11 Response (Page 3-499)**

“...the Projects’ less than significant impact on traffic during construction.”

WEXCO Comment: Disagree that the proposed construction project will induce “less than significant impact” ... there will be 160 truck trips per day during excavation/grading (39 weeks or 9 Months per the Schedule), and approximately 100 trucks per day for the concrete phase of the project. It is inconceivable that this extra volume would be considered “less than significant”. All the trucks will not only enter the Construction Site – for 30 Months – they will have to exit the site and cross the Canyon Roadway to do so.

10. **FEIR, 9.9R-16 Response (Page 3-501)**

“...the construction schedule is based on working days, not calendar days.”

WEXCO Comment: To the extent that the project is scheduled to last 30 Months (2 ½ years) per a Working Day Calendar (i.e. 660 working days or ~22 months of active Construction Work) over the course of 923 Calendar Days. The community at large will be subjected to almost 2 years of active construction work, construction traffic, delays and all the respective hazards.

11. **FEIR, 9.9R-18 Response (Page 3-502)**

“...construction workers ... will each take their own vehicle to the Development Site ... parking will be located on the development site or the Campus.”

WEXCO Comment: Are the Planners stating it is acceptable to allow HW employees / Construction Workers cross the at-grade hazard (i.e. Workers walking from Campus to the Development Site)? What mitigations have been proposed for construction workers’ safety during three (3) years of construction, and have the safety and traffic impacts been analyzed? Construction worker vehicles also add to the Traffic Delays.

12. **FEIR, 9.9R-19 Response (Page 3-502)**

“Construction of a sidewalk along the limited distance between Halkirk Street and the northern entrance to the Campus would not alleviate the daily lack of parking for students, staff, and faculty nor for the other parking needs generated during school (such as parent-teacher meetings, prospective parent tours, conferences) and special and athletic events after school.”

WEXCO Comment: There are other reasonable and safer alternatives than the construction of a Parking Structure and Bridge across Coldwater Canyon (e.g. Off-Site Parking; Car Pools; Parking Structure on Campus). The sidewalk solution is a preferable alternative with regard to any potential safety issue at the North entrance – the sidewalk solution is not suggested to meet project goals but rather to prevent the risk of injury to students during regular school days (even if the Parking / Athletic Structure is built) and during the special and athletic events that the FEIR acknowledges will still require residential parking/overflow.

13. **FEIR, 9.9R-21 Response (Page 3-503)**

“Contrary to the commenter’s assertion, the Project does not involve any additional trip generating uses and will not add 750 vehicles to Coldwater Canyon Avenue... The Project will not generate additional operational traffic over existing conditions.”

WEXCO Comment: Disagree. The HW Project goal is to alleviate allegations of daily parking on the neighboring streets, therefore (if the Plan is implemented) Coldwater Canyon will have much more traffic / usage (i.e. perhaps hundreds of extra vehicles concentrated at the Parking Structure on Coldwater at peak hours) because the vehicles that were parked many blocks away, on side streets near the campus, will (per plan) flow onto Coldwater into the proposed Parking Structure. The number of increased (concentrated) vehicles to campus is unclear, because the FEIR is unclear and nonspecific on the exact number of cars that park in the neighborhood on a daily basis.

14. **FEIR, Summary of Impacts and Mitigation Measures (Page 4-70)**

RC-GEO-23: “Truck Crossing” warning signs shall be placed 300 feet in advance of the exit in each direction.

RC-GEO-24: Flag persons shall be required at the job site to assist the trucks in and out of the Project area. Flag persons and warning signs shall be in compliance with Part II of the latest Edition of “Work Area Traffic Control Handbook.” The pedestrians shall be allowed to clear first prior to permitting the trucks to ingress or egress. (Emphasis added)

WEXCO Comment: Agree with Brohard opinion that the curvature of the Canyon Roadway would hinder Construction Flaggers ability to see the traffic signal and, as a result, could easily give the wrong signal to the truckers. The Mitigation Measure indicates Pedestrians will be allowed to “clear first” ... What pedestrians are the Planners allowing/providing clearance?

Additionally, Flaggers are at risk during the project relative to the steeply sloped grade of the Canyon Roadway, the quality of the trucks braking systems, the quality of the truck drivers, the high commuter and local traffic usage, the speed of the traffic on both sides of the Canyon Roadway, all coupled with the task of

paying close attention to pedestrians (as noted). Flaggers will be overtaken – and, inherently – safety will be compromised.

15. FEIR, D-63 & 64 (Pages 3-107 to 108)

As LADOT has stated its opposition to the voluntary improvement, it is no longer proposed by Harvard-Westlake. As stated in the RDEIR at page 3.8-10, the Project includes a fifteen-foot dedication on the west side of Coldwater Canyon Avenue along Harvard-Westlake's property frontage to provide the City's previously adopted standard half right-of-way dimension for secondary highways...

WEXCO Comment: This "fifteen-foot (15') dedication on the west side of Coldwater Canyon Avenue along Harvard-Westlake's property frontage" is tantamount to a shoulder lane. As we discussed in our 3/16/16 commentary this "dedication" is a dangerous scenario. This 15' "dedication" in front of the parking structure will encourage southbound morning commuters to drop-off persons, where the pedestrians will be further encouraged to Jaywalk across the Canyon Roadway (and be discouraged to walk to the Parking Structure, to then walk to the Bridge, to then walk across the Bridge, to then walk down the Bridge to access the Campus). This so-called 15' wide "dedication" is really another unofficial drop-off/pick-up point convenient to the southbound high traffic morning commuters. This dedication is simply another attractive and dangerous drop-off / pick-up spot. The risk of rear end collisions on southbound Coldwater Canyon is yet another aspect resulting from this attractive danger – in other words the danger of stopping and dropping off people to access the Campus (creating the hazard of rear end collisions) is in addition to the danger of pedestrians crossing the Canyon Roadway directly, instead of navigating through the Parking Structure to use the proposed Bridge.

WEXCO Comment: Agree with Brohard opinion that there are risks of rear end collisions. The FEIR does not address this issue in their response.

16. FEIR, Page 1-2

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

WEXCO Comment: Disagree. The Planners state in many places that the use of local streets will continue. There is no guarantee that local streets will not be used by persons accessing the Campus. There is no plan to implement No Parking signs and / or Permit Only Signs. It is more probable than not that persons will continue to park their vehicles, and access the Campus, via local streets. The relocation of the Bus Loading Zone on the Campus eliminates parking spots on the Campus.

17. **FEIR, Summary of Impacts and Mitigation Measures (Page 4-76)**

PDF-TR-3: The Parking Structure shall not have a restricted entry gate (e.g., key card) to ensure that vehicles do not back-up onto Coldwater Canyon Avenue.

WEXCO Comment: The lack of a security gate at the Parking Structure will encourage morning commuters to enter the Parking Structure and drop-off persons to access the Campus at the at-grade level. This lack of security access only increases the likelihood of at-grade jaywalking. Yet another attractive danger.

To the extent the planners change their mind and propose to install a secured gate entry in the Parking Structure, gate entry failures are commonplace. Such gate entry failures, where vehicles in the queue to access the Parking Structure will back-up onto southbound Coldwater Canyon, will create a traffic hazard (collisions, injuries and additional traffic complications).

Cordially,

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