



Catherine Palmer <council@babcnc.org>

Regarding Case #: CPC-2025-3449-CU3-SPPC-DRB-MSP ENV-2025-3450-CE

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Mon, Jan 12, 2026 at 10:11 PM

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To: Bel Air–Beverly Crest Neighborhood Council (BABCNC)

Land Use Planning Committee

RE: Agenda Item #6 for Tuesday, January 13, 2026

2785 N CASIANO ROAD; 2791 N CASIANO ROAD; 2845 N CASIANO ROAD

Milken Community School E Campus (Also commonly known as [15600 Mulholland](#))

CPC-2025-3449-CU3-SPPC-DRB-MSP ENV-2025-3450-CE

Subject: Formal Technical Objections to Milken East Campus Expansion (AJU Site) – Enrollment Increase to 900 Students

To: The Bel Air Beverly Crest Planning and Land Use Committee (BABCNC)

As a resident of Casiano Road, I wish to affirm our community's respect for Milken Community School and the value they bring to the community. However, we must formally object to the proposed expansion to 900 students. This proposal represents a significant departure from historical site attendance—which was traditionally 100–200 students—and replaces the originally intended staggered schedule with a simultaneous "all-at-once" arrival.

Our objection is rooted in critical flaws identified in the raw traffic data presented by Milken on January 8, 2026 to a small group of homeowners. Even a preliminary review reveals glaring inaccuracies: the study fails to account for bus traffic, underestimates vehicle unloading times, and provides no verifiable dates for site observations. Because Casiano Road is a constrained, "**one-way in, one-way out**" corridor, these data failures translate directly into a life-safety hazard.

We formally object to the traffic study based on the following safety and infrastructure failures:

- **Reliance on Theoretical Simulations over Real-Time Data:** The provided study is a mathematical forecast rather than a reflection of actual neighborhood conditions. The "Project Trip Generation Estimates" rely on national averages from the ITE Trip Generation Manual (2025), and the "On-Site Queuing Analysis" uses theoretical formulas from a 2001 textbook. Milken has been unable to provide the specific dates of site observations, leaving no way to verify if the data represents a typical high-volume school day.
- **Hillside Fire Access and Safety (LAMC 12.21.C.10):** Under the Los Angeles Hillside Ordinance, unimpeded emergency access is a legal mandate. The school provides only 10 on-site queuing spaces for 900 students. With Casiano Road already narrowed by Stephen S. Wise traffic and third-party buses, any overflow from the internal queue will create a stationary obstruction. This is a direct violation of LAMC 12.21.C.10, creating a life-safety hazard by potentially blocking LAFD access during a fire or medical emergency.

- **Cumulative Impact with Stephen S. Wise:** The study ignores the shared reality of our street. During peak hours, Stephen S. Wise traffic utilizes the West lane of Casiano Road, effectively halving the usable street length for Milken. The school's "Service Rate" calculations are over-optimistic because they do not account for this existing "lane-sharing" bottleneck or the dismissal overlaps with the Stephen S. Wise after-care program.
- **Failure to Account for the "Secondary Peak" (5:00–6:00 PM):** The study incorrectly assumes the vast majority of traffic occurs during a 3:00 PM dismissal. In a high school environment, students remain on campus for tutoring and clubs. The estimate of only 145 net trips during the "Commuter PM Peak" is a gross underestimation. By failing to model a "Secondary Dismissal," the study ignores the fact that hundreds of vehicles will depart exactly when Mulholland Drive and Casiano Road reach their highest daily volumes.
- **Interscholastic Events and Opposing School Traffic:** The study overlooks athletics, arts, and debates. These events bring in buses and hundreds of guests from opposing schools who are unfamiliar with the delicate traffic flow of Casiano Road. These visitors are prone to missing turns or attempting illegal U-turns, further obstructing the only entrance/exit to our community.
- **Contradictory Parking Infrastructure:** The site plan identifies 256 parking spaces. Providing this much on-site parking for a high school population creates a "pull factor" that encourages solo student driving. This directly undermines the 15% TDM trip reduction used to justify the project's feasibility.
- **Mathematical Inadequacy of the Queue:** The analysis assumes a "Transaction Time" of only 60 to 90 seconds. For high schoolers with sports gear and instruments, this is unrealistic. If actual unloading takes even 30 seconds longer than estimated, the 10-car reservoir will fail within minutes, spilling traffic onto the only entrance and exit for our neighborhood.

Analysis of Maximum Occupancy

Based on the physical constraints of Casiano Road, we contend that the **Maximum Safe Occupancy for this location should not exceed 500 students**. Our reasoning is as follows:

1. **Saturation Point:** At 900 students, the arrival rate (5.5 vehicles/min) outpaces the capacity of a 10-car reservoir. An occupancy of ~500 students reduces arrival pressure to a level where the internal queue can absorb minor delays without spilling onto public streets.
2. **Infrastructure Capacity:** With 256 parking spaces, the site is physically sized for a mid-sized student body. Forcing 900 students into this space exceeds the natural capacity of the lot.
3. **Safety Threshold:** The jump from the current 540-student phase to 900 represents a "tipping point" where the volume-to-capacity (V/C) ratio of Casiano Road enters **Level of Service (LOS) F**, representing total traffic breakdown.

We value Milken as a neighbor, but an expansion of this magnitude on a single-access hillside street is mathematically and logically untenable, as well as being unsafe. We request that the Land Use Committee mandate a supplemental study that models a maximum occupancy of 500 students to ensure the safety of all residents and students.

Sincerely,

Mona Cohen

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