SAN RAFAEL HIGH SCHOOL

MASTER FACILITIES LONG-RANGE PLAN AND STADIUM PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE NUMBER 2016082017

Prepared for

San Rafael City Schools

March 2017

Prepared by

Amy Skewes-Cox, AICP

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In conjunction with

BASELINE ENVIRONMENTAL CONSULTING
ENVIRONMENTAL COLLABORATIVE
INTERACTIVE RESOURCES
LSA ASSOCIATES
NATALIE MACRIS
PARISI TRANSPORTATION CONSULTING

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Chapter I
INTRODUCTION

♦ ♦ ♦

A. PURPOSE OF THE FINAL EIR

This document, together with the Draft Environmental Impact Report (DEIR), is the Final Environmental Impact Report (Final EIR or FEIR) for the San Rafael High School (SRHS) Master Facilities Long-Range Plan and Stadium Project (State Clearinghouse Number 2016082017). The DEIR identified the likely environmental consequences of the project and recommended mitigation measures to reduce or eliminate significant impacts. This document responds to public comments on the DEIR, revises the DEIR as necessary, and provides a Mitigation Monitoring and Reporting Program (MMRP) for the project.

According to the California Environmental Quality Act (CEQA) (as amended January 1, 2017), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the DEIR. For this project, San Rafael City Schools (SRCS) is the lead agency. This document has been prepared to respond to comments received on the DEIR and to clarify any errors, omissions, or misinterpretations of the analysis or findings in the DEIR.

This document, together with the DEIR, will constitute the FEIR if SRCS certifies the FEIR as complete and adequate under CEQA.

B. ENVIRONMENTAL REVIEW PROCESS

The DEIR was made available for public review from December 15, 2016, through January 30, 2017. The general public was advised of the availability of the DEIR through notification via email and Notices of Availability (NOA) mailed to neighbors of the project site. Public agencies and interest groups were also notified by mail. In addition to the City of San Rafael Community Development Department and Public Works Department, the DEIR notification was also sent via the State Clearinghouse to the California Department of Fish & Wildlife (CDFW), Native American Heritage Commission, California Air Resources Board, Regional Water Quality Control Board (RWQCB), and Caltrans District 4. The NOA was also sent to the Bay Area Air Quality Management District (BAAQMD), the California Department of Toxic Substances Control (DTSC), and the Division of the State Architect (DSA). The DEIR and NOA were posted on the SRCS website and SRCS Bond Program website on December 15, 2016.

During the public review period on the DEIR, written comments were made. A copy of written comments on the DEIR and responses to the comments can be found in Chapter II of this document.

The FEIR will be presented to the SRCS Board of Trustees at its meeting scheduled for **March 27, 2017 at 6:00 PM**, at the SRCS office, 310 Nova Albion Way, San Rafael, California. Before acting on the project, the Board must certify the FEIR and adopt the MMRP (see Chapter IV of this document). In addition, the Board must make the necessary findings for the adoption of mitigation measures associated with the project.

C. REPORT ORGANIZATION

This document consists of the following chapters:

- *Chapter I: Introduction.* This chapter includes a discussion of the purpose and organization of the FEIR.
- *Chapter II: Comment Letters and Responses for the DEIR.* This chapter contains the names of individuals and agencies commenting on the DEIR and reproductions of letters and emails received on the DEIR. The comments are numbered in the margins of the comment letters and responses are keyed to the comment numbers. Where revisions to the DEIR are appropriate, these are summarized and the actual text changes are shown in Chapter III.
- *Chapter III: DEIR Text Changes.* This chapter contains corrections or clarifications that have been made based on comments received on the DEIR or for other reasons. The changes show language that has been added to or deleted from the DEIR. Underlined text represents language that has been added to the DEIR; text in ~~strikeout~~ has been deleted from the DEIR.
- *Chapter IV: Mitigation Monitoring and Reporting Program.* This chapter identifies mitigation measures referenced in the EIR as necessary to avoid or reduce the project's potentially significant impacts and provides a program for implementation and monitoring of these measures. The timing and entity responsible for monitoring are identified.

Chapter II
COMMENT LETTERS AND RESPONSES FOR THE DEIR

♦ ♦ ♦

This chapter includes a reproduction of each comment letter (including emails) that addressed the DEIR and was received during the public review period. Each letter is followed by responses to comments made in the letter.

COMMENT NUMBER

A. Federal, State, and Local Agency Comments

1. City of San Rafael ..... A1-1 to A1-27
2. State of California Governor's Office of Planning and Research..... A2-1
3. California Department of Transportation, District 4 ..... A3-1 to A3-6

B. Public and Public Interest Group Comments

1. Montecito Area Residents' Association (MARA) …… ..... B1-1 to B1-39
2. Point San Pedro Road Coalition… ..... B2-1 to B2-3
3. William Rothman, MD… ..... B3-1 to B3-2
4. Paula Machado (No. 1)…..... B4-1 to B4-10
5. Tony Markwick…..... B5-1
6. William Carney, Citizens Advisory Committee (CAC) Chair… B6-1
7. Tricia Green and Thomas Scheidig… B7-1
8. John Braniff… B8-1
9. Jim Dunn… B9-1
10. Mary Gidley… ..... B10-1 to B10-2
11. Larry Mansbach B11-1
12. Ann Bauer ..... B12-1 to B12-3
13. Paula Machado (No. 2)…..... B13-1 to B13-2

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A. FEDERAL, STATE, AND LOCAL AGENCY COMMENTS

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January 30, 2017

Dr. Dan Zaich
San Rafael City Schools
310 Nova Albion Way
San Rafael, CA 94903

Subject: **Comments on San Rafael High School Master Facilities Long-Range Plan and Stadium Project Draft Environmental Impact; 185 Mission Avenue; SCH # 2016082017; Case No. P16-005**

Dear Dr. Zaich:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) prepared for the San Rafael High School Master Facilities Long-Range Plan and Stadium Project. We would like to commend San Rafael City Schools for preparing a clear, well-written and well-organized DEIR.

The City has completed a detailed review of the DEIR. Most of the DEIR study topics we requested during the Notice of Preparation process have been incorporated into the document. However, there are a number of topic areas that require further consideration, particularly the recommended DEIR mitigation measures that are contingent upon City of San Rafael approval. The City of San Rafael acknowledges that the long range campus plan and stadium project are not subject to City zoning review and building permits, but the impacts will be realized by the neighborhood and the City. Therefore, we respectively request the School District seriously consider our recommendations and requests in moving forward with environmental review and the future actions of the project.

Our detailed comments are as follows:

1. Section 4.3- Biological Resources
   DEIR Section 4.3 provides a detailed assessment of biological resource conditions and impacts. The DEIR reports that the City of San Rafael has not adopted a tree protection ordinance, nor that the City has specific policies related to tree protection, other than City Municipal Code provisions pertaining to street trees. However, tree removal and protection, particularly native tree species such as the Coast Live Oak and California Redwood Native are closely analyzed and regulated through Municipal Code Chapter 14.25, the Environmental and Design Review Permit process. For projects subject to environmental review, it has been a long-standing policy of the City to require a 3:1 replacement of native trees that are removed as a result of project development. This policy is typically applied as a mitigation measure in our

A1-1

environmental documents. It is recommended that this policy be respected and a specific mitigation measure be included in the DEIR. **A1-1**

2. Section 4.4- Cultural Resources.
DEIR Section 4.4 addresses both archaeological and historic resources. Regarding archaeological resources, the DEIR acknowledges that that the CEQA statute (Public Resources Code Section 21074) was amended in 2015 to now require an offer of tribal consultation to the local Native American Tribe at the on-set of the environmental review process (Assembly Bill 52). However, it is unclear if this consultation was offered to the local Native American Tribe (Federated Indians of Graton Rancheria), nor is there reference to this consultation in the discussion of impacts and mitigation. As the San Rafael High School site is located in an area of "Medium Sensitivity" on the City of San Rafael Archaeological Sensitivity Map (2001), this offer is consultation is encouraged. As part of the environmental review process for recent City projects (new Public Safety Center and redevelopment of City Fire Station 57), the Federated Indians of Graton Rancheria were consulted and the tribe opted to require cultural resource monitoring during the grading and construction phases of these projects. This consultation resulted in more substantial and detailed mitigation measures, which were incorporated into the environmental documents for these City projects. **A1-2**

Regarding historic resources, the DEIR correctly references the San Rafael Historical/Architectural Survey (1977/1986), which is used as a starting point or base by the City in screening potential historic resources. However, the DEIR notes that this survey represents a list of local historic resources. Please note the survey represents a list of "potential" historic resources. The survey was prepared prior to the current CEQA criteria prescribed for determining a historic resource; it is used a prompt for further analysis.

Regarding the main high school building (Building A), the DEIR acknowledges that it is listed in the City of San Rafael Historical/Architectural Survey and has been given a "Good" rating. The DEIR states that the survey solely provides a property address without further description. Please note that the City retains a file for each property listed on the survey, which contains a detailed description of the building/property and the rationale for the rating. We have copied the contents of the file for Building A, which we are forwarding to you for inclusion in the Final EIR (attached). **A1-3**

3. Section 4.8- Hydrology and Water Quality.
It is our understanding that this project is subject to a MS4 Permit and a separate NPDES Permit. While there are specific requirements for these permits, the city would require an applicant of a similar size project to install permanent trash capture devices on site and require the applicant to maintain these facilities in perpetuity. In addition, the City would normally require an agreement with the property owner which would detail the steps the city would need to take if this trash capture devise is not maintained. Provide a trash capture device on site and provide an agreement with the City which details what measures that the City is required to take if these system is not maintained correctly. **A1-4**

No Net Runoff Policy: The High School campus is located within the FEMA Flood Insurance Rate Maps (FIRM) Special Flood Hazard Zones AE and X. Therefore, the campus is vulnerable to flooding and could be impacted by the long-term rise in sea level. It is requested that a detailed drainage analysis be prepared to assess storm water capacity and the potential for flooding. The City has a longstanding policy for new projects that increase impervious surface coverage. The policy requires that there be no net increase in the amount of storm water runoff that is generated from the project site. The Campus Plan presents areas where impervious surface coverage would be increased. Therefore, there will likely be the need to plan for and provide on-site storm water storage to ensure that there is no net increase in storm water runoff.

A1-5

4. Section 4.10- Noise.
DEIR Section 4.10 addresses noise conditions, impacts and mitigation. Regarding construction-related impacts, it is unclear if pile driving is proposed or necessary for construction of the stadium project and/or the improvements envisioned by the long-range campus plan. Rather, the DEIR implies that pile driving is anticipated and that noise and vibration associated with pile driving are significant impacts that require mitigation (Impacts NOISE-3 and -4). The City of San Rafael does not support pile driving for this project and believes that the potential noise and vibration impacts associated with this activity at this location are significant and unavoidable for the following reasons:
   a. Pile driving is not appropriate for this location. The high school campus is in an area of sensitive receptors. In addition to the high school, the campus is bordered by residential uses including two neighboring residential retirement communities (Aldersly on 5th Avenue and San Rafael Commons at 4th/Union Streets). These uses are sensitive receptors.
   b. The noise and vibration impacts of pile driving are extremely difficult to mitigate. The mitigation measures that are recommended rely on the future development of a construction noise management plan with suggestions such as the jetting of piles and installation of temporary noise barriers to reduce the noise decibel levels from the projected 90 dBA to 70 dBA. While the suggested measures may reduce noise and vibration, there is no evidence presented in the DEIR that the impacts will be reduced to less-than-significant levels.
   c. As experienced with past development projects that have involved pile driving (Target Store @ Shoreline Center and the San Rafael Corporate Center), the noise associated with this activity carries well beyond 250-300 feet from the source.
   d. Alternative measures for foundation design, such as drilled-pier foundations are often recommended or required by the City to avoid the significant impacts associated with pile driving. It is recommended that mitigation measures presented for Impacts NOISE-3 and -4 include alternative foundation design measures.
   e. Written notice shall extend farther than the 250 feet noted. Since noise will be heard throughout the canyon area, we suggest notifying the residents within a ½ mile of the project. In addition we recommend several public meetings to coordinate this work and provide some social media outreach to notify the community.

A1-6

f. Ground movement and noise due the construction operations is an impact to the community. Damages to structures and biological resources can occur at a distance of greater than 100 feet as stated in the EIR. The EIR shall develop a method for evaluating all structures that could be damaged by pile driving. This should include the determination of where the soil material such as bay mud changes in depth and area which may be sufficient to analyzing the potential for damage from Pile driving. **A1-6**

5. Section 4.12- Transportation/Traffic.
DEIR Section 4.12 provides an analysis of transportation/traffic. The City's Department of Public works has completed a careful assessment of this analysis and presents the following comments. A memorandum of direct edits specific to the traffic analysis is provided as review comments attached (Exhibit A).

The DEIR does not include consideration for utilizing the School property, either the frontage to widen the street or within the site to accommodate additional turn pockets, loading zones and to enhance site and local circulation, while maintaining the on-street parking. It has been the longstanding policy of the City to require the dedication of Right-of-Way when private project impacts necessitate improvements to the public street network. Further alternatives should be explored to address these issues. **A1-7**

TRANS-1 includes development of a Transportation Demand Management (TMD) program. The TMD shall require implementation on an ongoing basis. A TMD should be a managed program. This program should be reviewed by the City and transit agencies to reduce vehicle trips. Periodic monitoring should be rephrased to annually at a minimum. **A1-8**

Incentivizing the TMD should be emphasized in order to promote compliance. Past experience has indicated that incentives are one of the most impactful ways to have a positive effect on traffic volume reductions. Consider dedicated parking spaces for carpooling as well as other measures.

TRANS-2 proposes expansion of the loading zone for student drop-off and pick-ups. Expansion of the loading zone does not sufficiently mitigate the impact of student drop-off due to lack of an adequate on-site drop-off location and circulation. The expansion would reduce the amount available street parking, promote additional traffic on Mission which may result in congestion. Remote drop-off is not an acceptable solution as it is impractical to utilize external areas further away to serve the school site. The use of a remote drop-off location may be limited when more convenient options are available. Reducing the available public parking along Mission Avenue by converting the designation to a drop off area is an impact to the residents in the area. **A1-9**

TRANS-3 proposes to reconfigure Mission at Union to add a left turn lane from Mission onto Union and a separate right turn pocket from Union to Mission north bound. The District should provide the additional Right-of-Way necessary for these measures without impacting the current capacity of the parking and the street, in order to be consistent with City policies. Displaced parking cannot be regained by the city on the existing roadway system, and therefore is not an acceptable mitigation measure. The design of roadway and loading zone **A1-10**

improvement mitigation measures shall provide no net loss of public parking and shall not constrain the existing Right-of-Way.

Queueing onsite is above acceptable levels and does not appear to be sufficiently mitigated. Onsite queueing may have additional negative effects that cannot be easily identified or addressed. Substantial improvements to circulation within and across the site may provide the capacity necessary to mitigate this concern in conjunction with potentially signalizing a driveway for school traffic and to coordinate with pedestrian corridors. We have concerns about the exit near Embarcadero based on the sight distance considerations and the crosswalk configuration. **A1-10**

The additional parking area near the stadium should be limited use, to prevent vehicles from entering the on-way driveway when this section of the parking lot is full. Assigned spaces or a gate system for example may limit this area to teachers. If this area is utilized for special events, an attendant should be present. Limited use of this area is necessary based on the fact that all vehicles must exit via 3rd street if a parking space is not available and then may re-enter the parking lot to continue looking for parking. Recirculation to find parking should occur on site.

TRANS-4 includes improvement to pedestrian facilities serving the campus. The applicant should provide the improvements necessary for sidewalks on the south side and the north side of Mission, as well as improving the parking near of the gym. The intent is for the School to provide a complete sidewalk system with access for students and patrons of the school which also include the installation of compliant ramps.

The uncontrolled crosswalk at Embarcadero has limited visibility, may conflict with the proposed driveway and may have limited use based on the location. The applicant's Traffic Engineer shall address whether the mid-block crosswalk at Embarcadero can be moved to the High School main entrance. This would include additional measures such as a rapid flashing beacon or an overhead flashing yellow beacon. This may also be coordinated with potential signalization. **A1-11**

Having a drive through from Mission to 3rd and/or on-site looped drop-off/pick-up may also be considered, which may be best utilized with signalization at 3rd Street. This option would improve loading and circulation with an emphasis on drop-off/pick-up activities, however further study of the impacts on 3rd street will need to be addressed.

TRANS-5 includes improvements to bicycle facilities. It is not clear how the proposed bicycle parking will be scaled in conjunction with the TDM, however increasing bike parking is encouraged with the needs of the users. Bicycle parking facilities shall be designed such that potential riders are encouraged by availability and security of parking. In addition the TDM program shall include some designation educating the users about the safe routes to the school and any other incentives provided. **A1-12**

The project should include some multi-modal access across the school property, in areas where modifications are proposed such as the soccer field or along site frontage. Complete pathways are needed and shall be incorporated into the current plan. Pursuing grants is encouraged; however this plan needs to provide additional paths regardless of the availability of specific grant funding. **A1-12**

TRANS-6 states that construction vehicles need to park on site and minimize their impact to students and faculty. We concur and reiterate that on-site parking shall not be displaced by construction activity without alternative accommodation on-site. **A1-13**

TRANS-7 relates to construction-related vehicle trips. The School shall obtain a grading permit for the stadium project from the City of San Rafael. The intent of this requirement is to make sure that applicable erosion control measures are in place as well as adequate staging and truck routing, and that the contractors operation does not impact adjacent property. In addition, any work or traffic control that occurs within the Right-of-Way shall require an encroachment permit from the City of San Rafael. **A1-14**

6. Section 5- Alternatives.
DEIR Section 5 provides an analysis of project alternatives. CEQA Guidelines Section 15126.6 requires that an EIR describe and evaluate a reasonable range of alternatives to the project that would meet the project objectives. The DEIR presents and evaluates two alternatives, which include a "No Project" alternative. The City does not find that a reasonable range of alternatives for the School District's long-range campus plan have been presented or evaluated that could potentially reduce the significant impacts the DEIR has identified for the project. Of particular concern is that the DEIR has identified four, significant and unavoidable transportation/traffic impacts of the project for which the recommended mitigation measures rely on the approval of the City of San Rafael. At minimum, the DEIR should have included and evaluated one additional project alternative to address and attempt to reduce the significant, unavoidable transportation/traffic impacts, and to assess possible mitigation measures that do not rely on the City's approval. For example, consideration should have been given to include a project alternative for the long-range plan that accommodates on-campus vehicle routing and loading that would avoid reliance on utilizing the current Mission Avenue City right-of-way (Impact TRANS-3). For this reason, the City believes that the scope of alternatives presented in the DEIR needs to be broadened. **A1-15**

In response to the Notice of Preparation (NOP), the City acknowledged that the topic of parking (adequacy and potential impacts) is no longer one that is subject to environmental review under the CEQA Guidelines. However, the City noted in its comments that parking for the long-range campus plan is critical for many reasons, including the planning for increased enrollment. As San Rafael High School is located in an area that has parking challenges it was requested that this topic be addressed and studied simultaneous to the DEIR review process. In our review of the DEIR, we did not see that this topic was addressed. Please advise us on the status of this request. **A1-16**

Thank you again for the opportunity to review and comment on the DEIR. Should you have any questions please do not hesitate to contact Paul Jensen, Community Development Director at 415-485-5064 or paul.jensen@cityofsanrafael.org or Bill Guerin, Public Works Director at 415-485-3110 or bill.guerin@cityofsanrafael.org.

Sincerely,

Paul A. Jensen
Community Development Director

Bill Guerin
Public Works Director

Attachments: City of San Rafael Historic/Architectural Survey file for San Rafael High School main building (Building A); 1977
Exhibit A – Traffic Analysis Review Comments Memorandum

cc: Mayor Gary Phillips and City Council Members
Jim Schutz, City Manager
David Heida, Fire Prevention
Lisa Goldfien, Assistant City Attorney
Montecito Area Residents Association; Attn: Vickie Hatos; P.O. Box 150266, San Rafael, CA 94915

CITY OF SAN RAFAEL, CALIFORNIA
DEPARTMENT OF PUBLIC WORKS

MEMORANDUM

TO: **BILL GUERIN, Public Works Director** **DATE: JANUARY 30, 2017**
PAUL JENSEN, Community Development Director

FROM: **JOSH MINSHALL** **FILE NO: 15.02.169**
ASSOCIATE CIVIL ENGINEER

SUBJECT: **San Rafael High School – Draft EIR, Traffic Analysis**

We have reviewed the traffic analysis which is part of the San Rafael High School Draft EIR, and have the following comments and corrections. They have been organized by page corresponding to the DEIR:

Page 4.12.1

The description of the US 101 ramps at downtown San Rafael is incorrect. Heatherton St. is a southbound one way street that provides connection from the Southbound off ramp at Mission Ave. to the on-ramp at 2nd St. Irwin St. is a northbound one way street that provides connection from the northbound off-ramp at 2nd St. to the on-ramp at Mission Ave. **A1-17**

Page 4.12.3

The Third St. transition to a one way street is approximately 300 feet east of Grand Ave., near the intersection with Mary St with no eastbound connection to Mary St. Similarly, Second St. is one way eastbound from west of Hayes St. to 300 feet east of Grand Ave. **A1-18**

Grand Ave. is minor arterial from Francisco Blvd. East to Mission Ave., and is collector from Mission Ave. to Villa Ave.

Heatherton St is located within CalTrans ROW and Irwin St. is within the City ROW, both are operated by the City. Irwin St. is one way northbound, and is not considered frontage.

Page 4.12.4

There are no markings for an uncontrolled crosswalk on Mission at Alice St. The crosswalk is located on Mission at the SRHS driveway. **A1-19**

San Rafael High is located about half (0.5) mile from the San Rafael Transit Center.

Page 4.12.8

As per the General Plan Policy C-5 A - Intersection Level of Service (LOS) LOS D is city wide, with LOS E downtown, and LOS F for Mission/Irwin. **A1-20**

Page 4.12.14

The 24 intersections analyzed were selected by SRHS and their traffic consultant Parisi, with input from the City provided. It is our understanding other may have also provided input on intersection selection. **A1-21**

Page 4.12.25 (Figure 4-12-3A)

Diagram 3 - 3rd/Embarcadero: PM volumes should have 844 eastbound through trips, not 884 as shown.

A1-22

Diagram 10 - 3rd/Union: PM volumes should have 65 northbound right trips, not 95 as shown.

Page 4.12.26 (Figure 4-12-3B)

Diagram 12 - 3rd/Grand: The PM peak volumes listed here are between 16:30 and 17:30, these volumes are not balanced with adjacent intersection of 2nd & Grand. The southbound difference is 147 and northbound difference is 92, which is significant and there are no driveways between these 2 intersections.

A1-23

If bike volumes be included in the peak hour selection, the peak hour should be between 16:45 and 17:45, it is same as the peak hour of 2nd/Grand and the volumes should be balanced.

Page 4-12-21 – Page 4-12-28:

Generally visuals such as maps, charts, or tables are included to show comprehensive assignment of additional trips of the project, during both AM and PM peak hour, at each study intersection.

A1-24

Page 4.12.38

Mitigation Measure TRANS-2a includes passenger loading zones. If loading zones are considered, it may be appropriate to designate the zones as loading only during pick-up and drop-off hours. This area can then be used as parking during other times of day or on days when school is not in session.

A1-25

Page 4-12-39

Mitigation Measure TRANS3a proposes reconfiguring the Union St/Mission Ave intersection. This modification would require removal of parking on Union St. as well.

A simple simulation of the intersection was performed to check the AM peak conditions. This was conducted to quickly estimate the delay at the intersection. It showed overall improvements after the mitigation measure; however the southbound delay and queueing would increase significantly:

A1-26

	Intersection			Approach			
	Delay	LOS		NB	**SB**	EB	WB
Existing AM	61.05226	F	Avg Delay	62.84	**30.99**	49.64	88.66
			Avg Queue	111	**34**	91	265
			MaxQueue	271	**209**	300	539
WBL + NBR	32.56609	D	Avg Delay	26.83	**52.23**	26.16	23.05
			Avg Queue	27	**94**	31	30
			MaxQueue	178	**339**	147	140

Page 4.12.41

Mitigation Measure TRANS-4a includes improvements to curb ramps. It is not clear how these ramps were identified as not ADA compliant. The ramps on Mission at Belle, Alice and Park were constructed in 2008 as part of Safe Routes to Schools Grant - SRHS Mission Ave. Sidewalk project. The ramps at 3rd/Embarcadero were constructed late 2007 as part of ADA Ramp project.

A1-27

LETTER A1
City of San Rafael

A1-1 The commenter's concerns about the importance of complying with San Rafael Municipal Code, Title 14 – Zoning, Chapter 14.25 – Environmental and Design Review Permits, are noted. As the commenter acknowledges, the proposed Master Facilities Long-Range Plan and Stadium Project are not subject to local zoning ordinances or regulations; however, the relevant provisions in Chapter 14.25 of the Municipal Code are reviewed under "San Rafael Municipal Code Provisions" on page 4.3-8 of the DEIR. A discussion of the conformance of the proposed Master Facilities Long-Range Plan to local plans and policies is provided on pages 4.3-9 and 4.3-10 of the DEIR. The discussion indicates the following: 1) detailed landscape plans would be prepared as part of each project undertaken under the Master Facilities Long-Range Plan, and would include trees, shrubs, and groundcover species; 2) appropriate controls would be implemented to ensure that street trees and other landscape trees to be retained in the vicinity of construction are adequately protected; 3) the replacement landscaping provided as part of individual projects would serve to replace any trees and other landscaping removed to accommodate new structures and other improvements contemplated under the Master Facilities Long-Range Plan, and would serve to ensure that there are no major conflicts with the General Plan or Municipal Code; and 4) the Master Facilities Long-Range Plan would be considered to have a less-than-significant impact with regard to conformance with local plans and policies, and no mitigation measures are considered necessary. The comment also requests a 3:1 replacement of native trees that are removed as a result of project development in accordance with City policy. Although this policy could not be located in the City's Municipal Code or General Plan, as stated above, new plantings of trees would be planted to replace trees removed for new construction, and the District would strive to meet the intent of applicable local regulations. Additionally, in accordance with Mitigation Measure AESTHETICS-1f, a landscape plan shall be developed for the entire campus prior to construction of any new campus buildings in the campus core, which shall include new evergreen tree plantings along Mission Avenue and 3rd Street parking areas.

Additional analysis regarding conformance of the proposed Stadium Project with local policies and ordinances is provided on pages 4.3-11 and 4.3-12 of the DEIR. This analysis indicates that a number of trees would be removed to accommodate proposed improvements, but none are native species and all were planted as landscaping on the campus. Again, the replacement landscaping would serve to replace any trees and other landscaping removed to accommodate improvements, and would serve to ensure that there are no major conflicts with the Municipal Code. No additional mitigation or revisions to the DEIR are considered necessary in response to the comment.

A1-2 This comment states that the DEIR is unclear if consultation was offered to the Federated Indians of Graton Rancheria (FIGR), and that this consultation is encouraged as the SRHS campus is in an area of "Medium Sensitivity" on the City's Archaeological Sensitivity Map.

Pursuant to the requirements of Assembly Bill 52 (AB 52), an offer of consultation to local Native American tribes must be done to identify and mitigate impacts on Tribal Cultural Resources prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report (California Public Resources Section 21080.3.1(b)). However, the District is required to offer consultation to those local tribes *that have requested, in writing,* to be informed by the agency

through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe (California Public Resources Section 21080.3.1(b)).

The District contacted FIGR's Tribal Heritage Preservation Officer (THPO) in August 2016 as a courtesy to discuss the location and scope of the proposed project, but as noted on page 4.4-12 of the DEIR, no tribe—including FIGR—has made a written request to be placed on the District's project notification list. As the District has not received such notification from any Native American tribe, consultation pursuant to the requirements of AB 52 is not required.

The District, however, is sensitive to the City's concern regarding consultation with FIGR. To address this concern, the District has again contacted FIGR's THPO to solicit comments on the EIR. No FIGR comments on the EIR were received. The District provided the THPO with a .pdf copy of Section 4.4, Cultural Resources, of the DEIR, and a link to the District's website where the entire DEIR could be viewed. The District also spoke with the THPO in early February 2017 to discuss the project and the status of the EIR. FIGR's THPO thanked the District for the update and indicated that FIGR would contact the District if FIGR had any questions or concerns. The District has not been contacted by the FIGR to date.

Consultation with appropriate local Native American tribe(s) is also included as part of Mitigation Measures CULT-1, CULT-4, CULT-7, and CULT-10 in the event archaeological deposits or human remains are encountered during project construction activities.

A1-3 The commenter notes that the San Rafael Historical/Architectural Survey (1977/1986) was prepared prior to the current CEQA criteria prescribed for determining a historic resource; therefore, the list represents potential historic resources rather than established local historic resources. The District concurs with this understanding of the survey listings.

The contents of the property file for Building A provided by the commenter are included as Appendix A of this document.

A1-4 The commenter notes that the project would be required to comply with MS4 and National Pollutant Discharge Elimination System (NPDES) permits and states that, in accordance with these permits, the City requires that projects of a similar size to the proposed project employ and maintain trash capture devices. Section 4.8.3 of the DEIR summarizes some of the requirements of the NPDES and MS4 permits, and notes that the City has the power to enforce the requirements of this permit and other City stormwater requirements under Section 9.30 of the Municipal Code. Specifically, Section 9.30.140 of the Municipal Code authorizes the City to require trash control and other stormwater protection Best Management Practices (BMPs) during construction, and Section 9.30.151 requires preparation and implementation of a Stormwater Control Plan (SCP) for new development projects. Section 9.30.151B states that the SCP must comply with requirements in the current MS4 permit and the Bay Area Stormwater Management Agencies Association (BASMAA) Post-Construction Manual.

The current MS4 permit (Order 2013-0001-DWQ) does not include specific trash control measures, but the findings note that the State Water Resources Control Board is developing a statewide Trash Policy and that, following the issuance of this policy, Trash Reduction Program requirements may be incorporated into future versions of the MS4 permit. The current BASMAA Post-Construction Manual (dated July 14, 2014) does not have any specific trash capture requirements.

Recently, the Marin County Department of Public Works and Marin County Stormwater Pollution Prevention Program (MCSTOPPP) have begun considering plans to comply with anticipated future statewide trash control measures. In an August 9, 2016 report to the County Board of Supervisors, the Department of Public Works noted that $70,000 has been budgeted in fiscal year 2017 to begin developing technical and regulatory tools to prepare a Trash Reduction Implementation Plan, which is anticipated to be submitted in June 2018. This plan will be designed to meet a 10 percent per year reduction in trash 5 millimeters (mm) or greater from entering storm drain outfalls in priority land use areas.

Once these trash control measures are developed and in place, they will be incorporated into permits and guidance manuals that a project applicant must demonstrate compliance with, and the City may enforce these requirements, as authorized by the Municipal Code. No additional mitigation is required to ensure that regulatory stormwater requirements are implemented by projects under the Master Facilities Long-Range Plan and that the projects do not result in a significant impact on stormwater quality.

A1-5 The commenter notes that the campus is located in Federal Emergency Management Agency (FEMA)-mapped flood hazard zones AE and X and states that City policy requires that projects that increase impervious surface areas in such areas not increase stormwater runoff, so as to prevent exacerbation of flooding impacts.

As noted in Section 4.8.3 of the DEIR, the project would be subject to the MS4 permit, and the City has authority to enforce the requirements of this permit under Section 9.30 of the Municipal Code. Section E.12 of the MS4 permit requires that any project involving the addition or replacement of at least 5,000 square feet of impervious surfaces incorporate measures to retain stormwater runoff so that peak flows are controlled to pre-development rates. As noted on page 4.8-12 of the DEIR, runoff must be routed to bioretention or other facilities sized and designed using either volumetric or flow-based criteria specified in the MS4 permit. Compliance with the MS4 permit would be documented in a Stormwater Control Plan in accordance with Section E.12 of the MS4 permit. Implementation of these existing regulatory requirements would ensure that stormwater runoff from development of the Master Facilities Long-Range Plan would not result in significant stormwater quality impacts with the potential to affect surface water bodies, and would require stormwater infrastructure to be built and maintained to prevent an increase in volumes or rates of stormwater runoff from the SRHS campus. As no increases in stormwater volumes or rates would be allowed under the MS4 permit, development under the Master Facilities Long-Range Plan would not have the potential to exacerbate flooding. Therefore, no drainage analysis or additional mitigation is required to ensure that new development under the Master Facilities Long-Range Plan would not significantly exacerbate existing flooding impacts.

A1-6 The commenter has questions regarding the necessity of pile driving for the Stadium Project and other Master Facilities Long-Range Plan improvements, and regarding the potential noise and vibration impacts that could occur. The commenter notes that the DEIR implies that pile driving is anticipated, and that Mitigation Measures NOISE-3 and NOISE-4 include measures to reduce the potential noise and vibration impacts. However, the commenter states that pile driving at the project site would be a significant and unavoidable impact even with mitigation based on the project setting and experience with past development projects.

At the time that the DEIR noise analysis was completed, it was unclear whether pile driving was necessary for build-out under the Master Facilities Long-Range Plan; therefore, the analysis conservatively assumed that pile driving would occur, and mitigation measures were drafted to reduce the potential noise and vibration impacts. However, the geotechnical information gathered since that time indicates that impact pile driving would not be necessary and that, in lieu of driven piles, alternate structural foundation support system(s) would be used, including drilled piers, auger pressure grouted piles, or thickened mat slabs, all of which would substantially reduce the potential noise and vibration level that could be generated during the construction of the foundations of buildings and structures that would be developed under the Master Facilities Long-Range Plan because pile driving generates substantially higher noise and vibration levels then other types of construction equipment (Tables 12-1 and 12-2 in FTA, 2006). This information has been added to Chapter 3, Project Description, of the DEIR to clarify that pile driving would not be used during build-out of the Master Facilities Long-Range Plan.

Page 3-22 is modified as follows to clarify the issue of pile driving:

> **Site Grading, Pile Installation, and Construction Staging**
>
> Site development would require moderate grading to raise the site where necessary to bring new building levels above the identified Federal Emergency Management Agency (FEMA) flood plain. Grading would also occur around buildings as necessary to provide wheelchair access to all new and modernized buildings on campus. In addition, grading would occur for the new field and parking lot.
>
> Site development would not require driven piles for structural foundation support for any of the components of the Master Facilities Long-Range Plan. Alternate structural foundation support system(s), such as drilled piers, auger pressure grouted piles, or thickened mat slabs would be used in lieu of driven piles. The final design for each component would be completed by the structural engineer, based upon site data provided by the geotechnical engineer, on a building-by-building basis.

The noise analysis has also been modified to reflect that pile driving would not be used during build-out of the Master Facilities Long-Range Plan. References to pile driving activities, and any associated mitigation, have been removed from pages 4.10-25, 4.10-27, 4.10-28, 4.10-29, 4.10-33, and 4.10-34 of the DEIR. Mitigation Measure NOISE-4b has been removed from the text of the DEIR.

Page 4.10-25, Mitigation Measure NOISE-3b, is modified as follows:

> *Mitigation Measure NOISE-3b: For each project under the Master Facilities Long-Range Plan, a Construction Noise Management Plan shall be prepared by a qualified acoustical consultant and included in all contractor specifications. The Construction Noise Management Plan shall contain a set of site-specific noise attenuation measures to further reduce construction noise impacts at the nearby on-campus buildings and off-site residential receptors. If appropriate based on the circumstances, multiple projects can be addressed under one Construction Noise Management Plan. The site-specific noise attenuation measures shall be designed to reduce noise levels at the nearest on-campus and off-site receptors to below 70 dBA L_{eq}, as practical. The nearest on-campus receptors*

may be located adjacent to construction and demolition locations. If it is not feasible to reduce noise at the nearest on-campus receptors to below 70 dBA L_{eq} due to their proximity to the nearest construction and demolition locations, the school shall relocate students to classrooms with interior noise levels below 45 dBA L_{eq}. At a minimum, the following measures shall be included in the Construction Noise Management Plan:

- ~~*Use jetting or partial jetting of piles into place using a water injection at the tip of the pile, if feasible.*~~
- *Construct or use temporary noise barriers, as needed, to shield on-campus construction and demolition noise from noise-sensitive areas to the extent feasible. To be most effective, the barrier should be placed as close as possible to the noise source or the sensitive receptor. Examples of barriers include portable acoustically lined enclosure/housing for specific equipment (e.g., jackhammer and pneumatic-air tools, which generate the loudest noise), temporary noise barriers (e.g., solid plywood fences or portable panel systems, minimum 8 feet in height), and/or acoustical blankets, as feasible.*

Page 4.10-27, first paragraph, is modified as follows:

Construction activities such as ~~pile-driving or drilling,~~ caisson drilling, the use of vibratory rollers, jackhammers or other high-power or vibratory tools, and mobile construction equipment can generate vibration in the immediate vicinity of the work area.

Page 4.10-27, second paragraph, is modified as follows:

Table 4.10-9 indicates that vibration levels during construction could disturb receptors ~~within approximately 300 feet of construction and demolition locations proposed under the Master Facilities Long-Range Plan if a pile driver were used and~~ within approximately 75 feet of the stadium site and the construction and demolition locations proposed under the Master Facilities Long-Range Plan if non-pile driving construction equipment were used.

Page 4.10-27, second paragraph, is modified as follows:

Any remaining vibration impacts on both on-campus and off-site receptors would be reduced to a less-than-significant level by the implementation of Mitigation Measure NOISE-4a, which would require construction to be scheduled to avoid disrupting classroom activities; the development of Construction Noise Management Plans to reduce noise generated by construction to the maximum extent feasible (high noise-generating construction activities often generate high vibration levels) ~~and to avoid the use of impact pile driving where feasible~~; the development of a compliance tracking system; and notification of nearby residents of planned construction activities.

Page 4.10-28, Table 4.10-9, is modified as follows:

TABLE 4.10-9 VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment		Reference PPV at 25 Feet[a] (in/sec)	Reference RMS at 25 Feet[b] (VdB)	Required Buffer Distance – On-Campus Threshold 83 VdB (Feet)	Required Buffer Distance – Off-Site Threshold 80 VdB (Feet)	Required Buffer Distance – On-Campus and Off-Site Threshold 0.3 in/sec (Feet)
~~Pile Driver (Impact)~~	~~upper range~~	~~1.518~~	~~112~~	~~232~~	~~291~~	~~74~~
	~~typical~~	~~0.644~~	~~104~~	~~125~~	~~158~~	~~42~~
~~Pile Driver (Sonic)~~	~~upper range~~	~~0.734~~	~~105~~	~~135~~	~~170~~	~~45~~
	~~typical~~	~~0.170~~	~~93~~	~~54~~	~~68~~	~~17~~
Vibratory Roller		0.210	94	58	73	20
Hoe Ram		0.089	87	34	43	11
Large Bulldozer		0.089	87	34	43	11
Caisson Drilling		0.089	87	34	43	11
Loaded Trucks		0.076	86	31	40	10
Jackhammer		0.035	79	18	23	6
Small bulldozer		0.003	58	4	5	1

Notes: Receptors within the buffer distance could be impacted by construction-generated vibration. Receptors outside of the buffer distance would not be expected to be impacted by construction-generated vibration.
[a] PPV = peak particle velocity, in/sec = inches per second,
[b] RMS = root mean square, VdB = vibration decibel
PPV2 = PPV1 x (D1/D2)^1.5
Where:
PPV1 is the reference vibration level at a specified distance.
PPV2 is the calculated vibration level.
D1 is the reference distance (in this case 25 feet).
D2 is the distance from the equipment to the receiver.
RMS2 = RMS1 – 30 Log10 (D2/D1)
Where:
RMS1 is the reference vibration level at a specified distance.
RMS2 is the calculated vibration level.
D1 is the reference distance (in this case 25 feet).
D2 is the distance from the equipment to the receiver.
Source of Equations: FTA, 2006. Chapter 12.
Source: FTA, 2006.

Pages 4.10-28 and 4.10-29, first paragraph in the "Vibration Damage" subsection, is modified as follows:

Development under the Master Facilities Long-Range Plan may have the potential to generate vibration that could damage off-site buildings. Table 4.10-9 indicates that

buildings located within approximately ~~74 feet of an impact pile driver could be exposed to vibration levels in excess of the 0.3 in/sec threshold for damage to buildings of conventional construction. Buildings located within~~ 20 feet of ~~non-pile-driving~~ construction equipment could ~~also~~ be exposed to vibration levels in excess of the 0.3 in/sec threshold for damage to buildings of conventional construction~~this threshold~~. The residences along Mission Avenue and Embarcadero Way are located approximately 50 feet and 70 feet away, respectively from the nearest construction locations proposed under the Master Facilities Long-Range Plan. Based on this proximity, vibration levels would not exceed 0.3 in/sec at off-site receptors ~~unless an impact pile driver is used~~. Therefore, the potential of construction activities implemented under the Master Facilities Long-Range Plan to result in damage to off-site buildings is less than significant. ~~The implementation of Mitigation Measure NOISE-4b below would reduce the impacts of potential building damage as a result of pile driving-generated vibration to a less-than-significant level. If pile driving is not used, no mitigation is required.~~

Page 4.10-29, Mitigation Measure NOISE-4b, is deleted as follows:

~~*Mitigation Measure NOISE-4b: San Rafael City Schools shall retain a structural engineer or other qualified professional to evaluate and recommend alternative methods to impact pile driving for project components that require the installation of piles. If it is not feasible to avoid impact pile driving, the structural engineer or other qualified professional shall evaluate the potential for vibration generated by the use of a pile driver during construction of a project implemented under the Master Facilities Long-Range Plan to damage off-site buildings within 100 feet of any impact pile-driving activities. The evaluation shall take into account project-specific information such as the composition of the structures, locations of the piles, and the soil characteristics in the project area, to determine whether impact pile driving may cause damage to nearby structures. If the evaluation finds that the impact pile driving may cause damage to a structure, the structural engineer or other qualified professional shall recommend design means and methods of construction to avoid the potential damage.*~~

~~*The combination of Mitigation Measures NOISE-4a and NOISE-4b would reduce this impact to a less-than-significant level. (LTS)*~~

Page 4.10-33, second paragraph, is modified as follows:

Construction activities such as ~~pile-driving or drilling,~~ caisson drilling, the use of vibratory rollers, jackhammers or other high-power or vibratory tools, and mobile construction equipment can generate vibration in the immediate vicinity of the work area.

Page 4.10-33, first sentence of third paragraph, is modified as follows:

Table 4.10-9 indicates that vibration levels during construction could disturb receptors within approximately ~~300 feet of construction and demolition locations proposed under the Master Facilities Long-Range Plan if a pile driver is used and within approximately~~ 75 feet of the stadium site if non-pile driving construction equipment is used.

Pages 4.10-33 and 4.10-34, last sentence of third paragraph, is modified as follows:

> Any remaining vibration impacts on both on-campus and off-site receptors would be reduced to a less-than-significant level by the implementation of Mitigation Measure NOISE-7, which would require construction to be scheduled to avoid disrupting classroom activities; the development of Construction Noise Management Plans to reduce noise generated by construction to the maximum extent feasible (high noise-generating construction activities often generate high vibration levels) ~~and to avoid the use of impact pile driving where feasible~~; the development of a compliance tracking system; and notification of nearby residents of planned construction activities.

Page 4.10-34, first paragraph, is modified as follows:

> The proposed Stadium Project would require the use of heavy construction equipment with the potential to generate vibration that could result in damage to nearby buildings. Table 4.10-9 indicates that buildings located within approximately ~~74 feet of an impact pile driver could be exposed to vibration levels in excess of the 0.3 in/sec threshold for damage to buildings of conventional construction. Buildings located within~~ 20 feet of ~~non-pile-driving~~ construction equipment could ~~also~~ be exposed to vibration levels in excess of the 0.3 in/sec threshold for damage to buildings of conventional construction. ~~this threshold.~~ The nearest residences to the proposed Stadium Project site are located along Embarcadero Way, ~~are located~~ approximately 70 feet from the restrooms proposed to be developed in the southeast corner of the stadium. ~~However, pile driving would not need to be used to construct a restroom. Therefore, construction of the restrooms would not have the potential to cause vibration damage to these buildings. Pile driving could be used in the construction of the proposed new bleachers. The proposed new bleachers would be located over 100 feet from the nearest off-site buildings, and consequently would not have the potential to generate vibration levels of over 0.3 in/sec at these buildings.~~ Therefore, the potential of the proposed Stadium Project to result in damage to off-site buildings is less than significant.

The commenter also requests that written notice be provided to residents within ½ mile of the project, and suggests that the District notify the community of activities through public outreach and public meetings. In accordance with Mitigation Measures NOISE-3d and NOISE-6, residences located within 250 feet of a project implemented under the Master Facilities Long-Range Plan shall be provided with written notice of construction activity within at least 10 days before work begins, except in the case of an emergency, and shall include the contact information of the construction complaint and enforcement manager for the project. At a distance of 250 feet, construction noise of 85 dBA at 50 feet (which is the average of the noise levels presented in column "I" of Table 4.10-8) would be approximately 70 dBA,[1] and would be even lower if there are buildings present that block

[1] The following propagation adjustment was applied to estimate noise levels at 250 feet assuming construction noise levels of 85 dBA at 50 feet:

dBA2 = dBA1 + 10 x Log10 $(D1/D2)^{2.5}$

Where:

dBA1 reference noise level at a specified distance (in this case 50 feet)

dBA2 is the calculated noise level

D1 is the reference distance (in this case 50 feet)

D2 is the perpendicular distance from receiver

Source: Federal Transit Administration, 2006. Transit Noise and Vibration Impact Assessment (FTA-VA-90-1003-06).

line of site between the construction site and receptors beyond 250 feet, which is likely given the number of buildings located on the project site and surrounding areas. Furthermore, receptors beyond this distance would still be able to voice complaints about construction noise because Mitigation Measure NOISE-3c requires the contact information of the construction complaint and enforcement manager to be posted in conspicuous locations at the construction site, and requires the construction complaint and enforcement manager to respond to any such complaints. Contact information and complaint procedures would also be available on the SRCS Bond Program website (http://www.srcs.org/bond-program). No additional mitigation is required.

A1-7 Section 4.12, Transportation and Traffic, of the DEIR identified existing transportation conditions near the SRHS campus and the potential impacts that would result from the implementation of the Master Facilities Long-Range Plan. Several field reviews were conducted to evaluate existing transportation conditions along roadways peripheral to SRHS. Project vehicle trip generation assumptions were based on information provided by the District, and a comprehensive travel survey administered by the District to students of SRHS and Madrone High School. The results of these field reviews and data collection efforts informed the transportation analysis conducted for the DEIR. Impacts TRANS-1 through TRANS-7 detail potential project-related impacts as they relate to vehicular, bicycle, and pedestrian traffic as well as those associated with construction activities.

Responses to the City's memorandum with edits to the DEIR are provided in Responses to Comments A1-17 through A1-27.

The District recognizes that the implementation of the Master Facilities Long-Range Plan could result in increased traffic within the vicinity of the SRHS campus, and has proposed Mitigation Measure TRANS-1 through TRANS-7, as feasible, to address identified impacts resulting from this increased traffic. It should be noted, however, that the transportation impact analysis conservatively assumed that future travel mode shares would remain consistent with those under existing conditions and all identified impacts assumed no mitigation. As discussed in the DEIR, however, the implementation of these measures, as feasible, would reduce vehicular trip generation to the campus and the resulting traffic congestion along streets peripheral to the campus. The mitigation measures, as feasible, would also address bicycle and pedestrian access and safety elements noted in the DEIR.

The provision of dedicated District land was not considered necessary, and would restrict the District's ability to provide functional instructional and administrative space to meet program requirements and address increasing enrollment, or develop public school sites that reflect contemporary standards and 21st century changes in education. The implementation of Mitigation Measure TRANS-1 would reduce the number of single-student vehicle trips to and from the campus, thereby reducing the overall traffic congestion along surrounding streets, as well as the potential impacts described in the transportation section.

Within 3 to 6 months of certification of the EIR, the District will schedule a meeting with the City of San Rafael to discuss specific elements of the mitigation measures, as feasible, as detailed in the DEIR.

A1-8 Mitigation Measure TRANS-1a requires development of a Transportation Demand Management (TDM) program for San Rafael High School, which includes designated on-site parking spaces for

carpools. The District plans to develop and implement the TDM program within 1 year of certification of the EIR, and in advance of completion of the Master Facilities Long-Range Plan. The District will invite the City of San Rafael and community members (including but not limited to the Montecito Area Residents' Association and the Point San Pedro Road Coalition) to participate in the development of the TDM program. As part of the public outreach effort, the District will work with community members to design a sustainable TDM program aimed at reducing the traffic congestion resulting from vehicle trips to and from the SRHS campus.

The District will also work with the Marin County Safe Routes to School program to identify potential incentives that could be used to encourage both students and faculty to embrace more sustainable modes of travel such as walking, bicycle, transit, and carpooling as a means of traveling to and from school. The District also plans to work with the Safe Routes to School program and the City to schedule a walking and bicycling audit along streets surrounding the SRHS campus. The purpose of the audit would be to identify safety concerns that hinder student travel to and from school by walking and bicycling.

The District plans to conduct periodic monitoring of the TDM program implementation, and such monitoring would be included as a task identified in the TDM program. Approximately every 2 years, the District would review the TDM program and update it as necessary in response to the evolving transportation demand needs of the SRHS campus. Generally, traffic increases are gradual and only slightly vary from year to year; thus a 2-year monitoring cycle would allow the District to conduct a comprehensive TDM review based on potentially more substantial changes to traffic operations. The 2-year monitoring period would also allow the District to review the impacts of the TDM plan on traffic congestion on streets in the campus vicinity. In addition, the 2-year review would be in concert with the 2-year countywide school travel survey conducted by the Marin County Safe Routes to School program.

A1-9 A detailed parking study was included in Appendix F-7 and was mentioned on page 4.12-14 of the DEIR. The study found that, on average, the parking occupancy along Mission Avenue (between Union Street and Belle Avenue) ranged between about 57 percent and 83 percent, with a surplus of about 10 spaces available during the peak period for parking demand (11:00 AM to 1:00 PM).

While parking shortfalls resulting from a project are not considered potentially significant impacts under the CEQA significance criteria (as explained on DEIR page 4.12-36), the District acknowledges that the reduction of parking supply along Mission Avenue could inconvenience area residents. As such, the District plans to work with the City, as feasible, to identify appropriate times for the loading zone parking restrictions that would allow neighborhood residents use of on-street parking during off-peak hours for school pick-ups and drop-offs.

The proposed loading zone improvements, as feasible, would serve to alleviate traffic congestion along Mission Avenue by providing substantially more designated curb space than currently exists for students to be dropped off and picked up. These enhancements would enable vehicles to pull to the curb rather than be stopped within an active travel lane and blocking traffic, which results in congestion and unsafe traffic movements (e.g., motorists passing vehicles by traveling into the other direction of traffic), and encourages drop-offs and pick-ups within both active traffic lanes, causing further traffic congestion.

Mitigation Measure TRANS-2a is not a stand-alone mitigation measure. The District would work with the City, as feasible, to implement TRANS-2a with Mitigation Measures TRANS-1 through TRANS-7, as feasible, which would reduce the overall traffic volumes along Mission Avenue.

A1-10 The primary mitigation measure suggestion in Mitigation Measure TRANS-3a is that the "additional lanes could be introduced by restriping the existing roadway to provide the additional lane markings within the existing right-of-way." It adds, "if feasible, and to the extent that California Department of Education (CDE)-mandated school site size requirements would not be violated, an alternative roadway reconfiguration could include potentially moving the roadway curb and sidewalk southerly (onto District property) to provide the extra lane width."

A detailed parking study was included in Appendix F-7 of the DEIR. The results of the parking study noted that during the peak period of parking demand (11:00 AM to 1:00 PM), the parking occupancy rate along Mission Avenue (between Union Street and Belle Avenue) is about 83 percent during a non-event day at SRHS, with a portion of this parking demand generated by students of SRHS.

The accommodation of additional lanes at the Mission Avenue/Union Avenue intersection would necessitate the removal of parking, and potentially result in a parking shortfall, i.e., available parking would not be sufficient to accommodate parking demand. However, through the implementation of Mitigation Measure TRANS-1a, the District would develop strategies to reduce vehicle trip generation and subsequent parking demand generated by SRHS students along neighborhood streets. This would increase parking supply for residential needs and potentially off-set the parking losses for the intersection improvements.

The implementation of the Master Facilities Long-Range Plan would result in increased queue lengths for vehicles exiting the SRHS campus. However, these queues would be fully contained within the campus and would not affect traffic flow along City right-of-way. On-site queuing would not be dependent on any sight distance considerations for the intersection at Embarcadero, which is located upstream of the SRHS driveway. Please see Response to Comment A1-11 for a discussion of signalization at the intersection of 3rd Street and the SRHS driveway.

The District has determined that the aisle-way of the additional parking area next to the proposed stadium could be increased to 24 feet in width (from the originally proposed 20 feet), which would enable a two-way aisle-way.

A1-11 As stated in Mitigation Measures TRANS-4a and TRANS-4b, the District plans to work with the City of San Rafael, as feasible, on the implementation of projects identified in page 4.12-41 of the DEIR that would improve pedestrian facilities surrounding the campus.

Vehicular turning movements at the project-proposed driveway along 3rd Street would be limited to right turns out only. Exiting vehicles would not conflict with pedestrians at the 3rd Street/Embarcadero Way intersection, which is located upstream from the proposed driveway. The marked crosswalk across 3rd Street at Embarcadero Way currently exists and is recommended for enhancement with the installation of a rectangular rapid flashing beacon (see Mitigation Measure TRANS-4a of the DEIR).

The District has considered the City's comments related to improving site circulation by providing a one-way driveway through the SRHS campus, e.g., connecting Mission Avenue to 3rd Street. Such a driveway, potentially located just east of the soccer fields, for example, would reroute a portion of outbound SRHS traffic from Mission Avenue onto westbound 3rd Street. The added vehicular traffic would increase vehicular delays for traffic traveling westbound on 3rd Street and further deteriorate level of service at intersections along 3rd Street by substantially increasing delays at each intersection. For example, the Irwin Street/3rd Street intersection would likely experience an increase in delay that would result in the intersection operating at level of service (LOS) F. While an on-site route would redirect traffic from Mission Avenue, it would result in additional project-related impacts along the 3rd Street corridor. A driveway through campus between the main classroom buildings and soccer fields would cut into recreational facilities and create safety and security concerns for students and staff, and would restrict the District's ability to provide functional instructional and administrative space to meet program requirements and develop public school sites that reflect contemporary standards and 21st century changes in education.

The District also considered the potential impacts of signalizing one the SRHS driveways along 3rd Street, i.e., the SRHS Driveway (E)/3rd Street intersection, which accommodates both inbound and outbound traffic. This intersection operates at an acceptable level of service, and school-related queueing is generally contained within the SRHS campus. This would not be the case with signalization. During the morning peak hour, vehicular queue lengths along 3rd Street would substantially increase and lead to subsequent delays at adjacent intersections along the corridor. For the majority of left-turning vehicles traveling eastbound on 3rd Street, the vehicular queue length would extend to about 700 feet. This queue would spill back onto the upstream intersections along 3rd Street and would likely deteriorate the intersection level of service operations and cause increased congestion and lane-changing.

For the above reasons, no changes to the DEIR text are considered necessary.

A1-12 As discussed in the DEIR (page 4.12-4), the existing bicycle parking area on campus can accommodate about 24 bicycles. In accordance with Mitigation Measure TRANS-5a, the District would increase the capacity of the on-campus bicycle parking facility to safely and securely accommodate up to 100 bicycles. . Currently 3 to 4 percent of students travel to and from school by bicycle, and the proposed bicycle facilities would adequately accommodate the demand for bicycle parking. However, the implementation of Mitigation Measure TRANS-1a would be expected to increase the number of students traveling to school by bicycle. The District plans to work with the City to conduct bi-annual student travel surveys that would identify the number of students traveling to and from school by bicycle. Each year, the District would review the share of students traveling by bicycle against the bicycle parking inventory and provide additional bicycle parking on-campus as necessary.

As stated in Mitigation Measures TRANS-4c and TRANS-5c, the District would enroll and actively participate in Marin County's Safe Routes to School program and host educational programs about safe routes to school. Likewise, as stated in Mitigation Measure TRANS-5b, the District would work with the City, as feasible, to obtain a grant to conduct a feasibility study relating to the provision of a bicycle and pedestrian pathway along the 4th Street corridor. While the design and construction of the proposed pathway (if feasible) is not included in the Master Facilities Long-Range Plan, the District plans to work with the City of San Rafael to coordinate its implementation to coincide with

the completion of the Master Facilities Long-Range Plan. Currently, no funding sources have been identified for the construction of this pathway.

A1-13 Comment noted. The project's construction management plan would require that all construction-related parking occur within the SRHS campus to limit impacts on parking availability along neighborhood streets adjoining the campus.

A1-14 The District would obtain an encroachment permit from the City of San Rafael for any work performed in the City right-of-way. A grading permit would also be obtained from the City to ensure that adequate erosion control measures are in place. Erosion control is a specific part of the Storm Water Pollution Prevention Plan (SWPPP) that is both a DSA and a contract requirement for the Stadium Project.

A1-15 A number of mitigation measures were recommended to reduce the identified traffic impacts. The reason that some of these impacts were identified as significant and unavoidable is because the mitigation measures require coordination and involvement of the City of San Rafael, and the District cannot require the City to carry out any specific mitigation measures. The intersection and road improvements recommended are not in the jurisdiction of the District. Implementation of such measures would also be subject to available funding, which is unknown. Therefore, the District is unable to commit to implementation of these measures.

On-campus vehicle routing and loading were considered during the DEIR preparation and as part of Response to Comment A1-11. The District reviewed the possibility of routing vehicular traffic from Mission Avenue to 3rd Street through the campus site but found that it would potentially result in additional project-generated impacts along the 3rd Street corridor. Please refer to Response to Comment A1-11 for additional discussion. An EIR's discussion of alternatives need not include alternatives that do not offer significant environmental advantages in comparison with the project or with the alternatives that are presented in the EIR (14 Cal. Code Regs. Section 15126.6(b); *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912).

The EIR consultants found that the recommended mitigation measures were adequate for the identified impacts and did not consider it necessary to address another alternative that was not either feasible, cost-effective, or superior to the proposed project.

Removing all traffic from the Mission Avenue corridor would not be feasible and would result in significantly more traffic on 3rd Street. Comments on Impact TRANS-3 have been addressed in Responses to Comments A1-7, A1-10, and A1-11.

The commenter states that it does not believe the DEIR evaluated a reasonable range of project alternatives, and that the DEIR should have considered an additional project alternative that included on-campus vehicle routing and loading. Recent case law has shown that the number of alternatives need not be exhaustive but that alternatives should allow informed decision-making. (See *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 234 Cal.App. 4th 214; *Saltonstall v. City of Sacramento* (2015) 234 Cal.App. 4th 549; *City of Maywood v. Los Angeles Unified School Dist.* (2012) 208 Cal.App.4th 362; *Citizens for Open Gov't v. City of Lodi* (2012) 205 Cal.App.4th 296.) No set number of alternatives is necessary to constitute a legally adequate range of alternatives, and the District, as the lead agency, has the discretion to determine how many alternatives will constitute a reasonable range (*Citizens of Goleta Valley v. Board of Supervisors*

(1990) 52 Cal.3d 553, 566). As stated in Section 15126.6 of the CEQA Guidelines, "An EIR need not consider every conceivable alternative to the project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible…There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." Likewise, CEQA does not require that an agency consider alternatives to a component of a project; it requires that an agency instead focus on alternatives to the project as a whole (*Calif. Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 993).

The range of alternatives reviewed in the EIR provided the District with feasible alternatives to consider that met the project's objectives and mitigated its impacts. To develop a range of alternatives, the District considered the project objectives and purposes, the feasibility of possible alternatives, and the extent to which possible alternatives would reduce or eliminate one or more of the significant environmental effects of the project, among other factors set forth in Chapter 5, Alternatives, of the DEIR. During the scoping process, an off-site alternative was also considered for the project in addition to the on-site alternative included in Section 5.2. The District found that an off-site alternative would not meet the needs of the District schools because dividing the campus into two locations would not meet the educational or administrative needs of the students or the District. This off-site alternative was considered but rejected.

Addressing both the "No Project" and the "Relocated Madrone High Continuation School Alternative" was considered adequate to address primarily the traffic impacts identified for the project, especially as related to increased traffic on Mission Avenue and conflicts during drop-off/pick-up times. Allowing increased access on Union Street was intended to show an alternative access point that would reduce the number of cars on Mission Avenue.

For the above reasons, the District does not find it necessary to address a new alternative in the EIR.

A1-16 As noted in Section 4.12, Transportation and Traffic, of the DEIR, the existing parking conditions within and surrounding the campus were assessed and documented in a detailed parking study provided in Appendix F-7. The report summarizes a parking utilization study conducted to evaluate existing and future on- and off-site parking conditions within the campus vicinity. The study also provides a list of recommendations to encourage more efficient use of existing and future parking facilities within the campus vicinity.

A1-17 Comment noted. In response to this comment, the DEIR text is edited as shown below.

Page 4.12-1 is modified as follows:

- U.S. Highway 101 (Highway 101 or US 101) is an eight-lane freeway that runs in the north-south direction and bisects San Rafael. Several interchanges with Highway 101 provide access to the city, including the southbound on- and off-ramps at the Hetherton Street/2nd Street intersection and the Hetherton Street/Mission Avenue intersection; and, the northbound on- and off-ramps at the Irwin Street/Mission Avenue and ~~Hetherton Street/Mission Avenue intersections, and northbound on- and off-ramps at the~~ Irwin Street/2nd Street ~~and Hetherton Street/2nd Street~~ intersections respectively.

A1-18 Comment noted. In response to this comment, the DEIR text is edited as shown below.

Page 4.12-1 is modified as follows:

- 3rd Street is a major arterial roadway that runs in the east west direction. East of Union Street, 3rd Street operates as a two-way street with two through travel lanes in each direction and turning lanes provided at major intersections. Approximately 300 feet ~~west~~ east of Grand Avenue (near the intersection with Mary Street), 3rd Street transitions into a one-way street running in the westbound direction. Along this segment, 3rd Street operates as a one-way couplet with 2nd Street. Near the SRHS campus, on-street parking is provided on both sides of the street between Union Street and Embarcadero Way.

Page 4.12-3 is modified as follows:

- 2nd Street is a major arterial roadway that pairs as a one-way couplet with 3rd Street. 2nd Street runs in the eastbound direction from just west of the intersection with Hayes Street ~~the Marquad Avenue/4th Street/West End Avenue intersection~~ to approximately 300 feet ~~west~~ east of Grand Avenue, where it merges with 3rd Street. Some parking is provided along the segment of 2nd Street between Irwin Street and Grand Avenue.

Page 4.12-3 is modified as follows:

- Grand Avenue is a ~~major~~ minor arterial roadway that is oriented in a north-south direction from Francisco Boulevard East in the south to its intersection Mission Avenue in the north, thereafter Grand Avenue, is a collector from Mission Avenue in the south to its intersection with Villa Avenue in the north. Grand Avenue functions as a two-way street with one travel lane in each direction. Parking is generally provided on both sides of the street.
- Hetherton Street is a one-way roadway in downtown San Rafael. Hetherton Street, under the jurisdiction of Caltrans but maintained and operated by the City of San Rafael, runs in the southbound direction from its intersection with the Mission Avenue/Highway 101 off-ramp to the north to the 2nd Street/Highway 101 northbound on-ramp intersection to the south. Hetherton Street has three southbound through travel lanes with additional turn lanes provided at major intersections. There is no parking provided along Hetherton Street.
- Irwin Street~~, also under the jurisdiction of Caltrans,~~ is a one-way roadway in downtown San Rafael oriented in the northbound direction from the 2nd Street/ Frontage Road intersection to the Mission Avenue/Highway 101 southbound on-ramp. Irwin Street has three northbound through travel lanes with additional turn lanes provided at major intersections. Parking is provided on both sides of the street but is prohibited during the evening peak commute period to accommodate heavier traffic flows.

A1-19 Comment noted. In response to the comment about crosswalk markings, the DEIR text is modified as follows.

Page 4.12-4 is modified as follows:

> Peripheral to the SRHS campus (along Mission Avenue, Union Street and 3rd Street), there are marked crosswalks, including crosswalks controlled with traffic and pedestrian signals (e.g., Union Street/3rd Street), crosswalks controlled with all-way stop signs (e.g., Union Street/Mission Avenue), and uncontrolled crosswalks (across 3rd Street at Embarcadero Way, across Union Street at 4th Street, and across Mission Avenue at Park Street, ~~Alice Street, and~~ Belle Avenue, and at the SRHS Driveway [approximately 140 feet west of Alice Street])~~)~~.

Regarding the comment on the distance between the SRHS campus and the San Rafael Transit Center, no modifications need to be made to the text. The DEIR accurately states this distance as less than 1 mile, as this statement is applicable to the distance from any point on campus to the San Rafael Transit Center.

A1-20 Comment noted. The level of service significance criteria applied to the project (per direction from the City of San Rafael) are stated in page 4.12-11 of the DEIR.

A1-21 The study intersections were selected and confirmed upon consultation with the City of San Rafael during meetings held on July 26, 2016 and August 31, 2016.

A1-22 Comment noted. The referenced trip numbers in Figure 4-12-3A are typos. The figure has been revised to reflect 844 eastbound through trips during the evening peak hour at 3rd Street/Embarcadero Way and 65 northbound right-turn trips at the 3rd Street/Union Street intersection as shown in Chapter III..

A1-23 Comment noted. As stated on page 4.12-14 of the DEIR, the peak hour traffic volumes were based on the highest total intersection traffic volume at each intersection. This allowed for a conservative analysis that assumes project-generated traffic would be added to the highest intersection traffic volumes throughout the morning and evening peaks. Although traffic counts were conducted at both the 2nd/Grand and 3rd/Grand intersections on the same day between 4:00 and 6:00 PM, overall hourly traffic levels were highest at each of these intersections during different 1-hour peaks within this 2-hour period. The highest volumes were used in the transportation study to provide a conservative or "worst-case" assessment of traffic conditions.

A1-24 Comment noted. Intersection-level assignment of project trips was based on the student vehicle trip distribution rates presented in Table 4.12-9 of the DEIR and can also be derived from the intersection level of service analysis outputs provided in Appendix F-6 of the DEIR.

A1-25 Comment noted. Please see Response to Comment A1-9.

A1-26 Based on the transportation study, the recommended Mitigation Measure TRANS-3a, as feasible, would improve the Union Street/Mission Avenue intersection's performance during the AM peak hour from an unacceptable LOS F condition to an acceptable LOS D condition. This is consistent with the City of San Rafael's findings.

Average motorist delays would decrease from over 60 seconds to about 30 seconds. Based on Synchro modeling, southbound motorists would experience about 28 seconds of delay without the proposed improvements; this would decrease to about 24 seconds with the improvements.

A1-27 Some of the curb ramps curb ramps along Mission Avenue do not meet current ADA requirements (i.e., ramps at the Mission Avenue/Belle Avenue and at the Mission Avenue/Alice Street intersections). However, ADA-compliant curb ramps were constructed in 2007 at the Embarcadero Way/3rd Street intersection and in 2008 at the Mission Avenue/Park Street intersection as part of a Safe Routes to School grant.

Page 4.12-41, third bulleted item under Mitigation Measure TRANS-4a, has been revised as follows:

- *Reconstructing non-compliant curb ramps, as appropriate, to meet Americans with Disabilities Act (ADA) standards at intersection locations peripheral to the school, i.e., San Rafael High School Driveway (East)/3rd Street, ~~Embarcadero Way/3rd Street,~~ Mission Avenue/Belle Avenue, Mission Avenue/Alice Street, ~~Mission Avenue/Park Street,~~ and Mission Avenue/Union Street.*

LETTER A2

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

RECEIVED FEB X 3 2017

January 31, 2017

Dan Zaich
San Rafael City Schools
310 Nova Albion Way
San Rafael, CA 94903

Subject: San Rafael High School Master Facilities Long-Range Plan and Stadium Project
SCH#: 2016121043

Dear Dan Zaich:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 30, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

A2-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

LETTER A2

Document Details Report
State Clearinghouse Data Base

SCH#	**2016121043**
Project Title	San Rafael High School Master Facilities Long-Range Plan and Stadium Project
Lead Agency	San Rafael City Schools

Type	**EIR** Draft EIR
Description	Total of 84,015 gsf of existing buildings would be removed and 132,237 gsf of new buildings would be constructed. At completion, the SRHS campus would have 327,892 gsf of campus buildings, an increase of 48,222 gsf on the campus compared to existing conditions. Madrone High Continuation School is continuing on the campus but would be moving to a new building at the north end of the campus, closer to Mission Ave. Total on-campus enrollment would increase by 200 students. No new staff or faculty increases are projected.

Lead Agency Contact

Name	Dan Zaich		
Agency	San Rafael City Schools		
Phone	415-492.3200	***Fax***	
email			
Address	310 Nova Albion Way		
City	San Rafael	***State*** CA	***Zip*** 94903

Project Location

County	Marin		
City	San Rafael		
Region			
Lat / Long	37° 9.7" N / 122° 5.132" W		
Cross Streets	Mission Ave, Union St, Embarcadero Way		
Parcel No.	014-101-09		
Township	***Range***	***Section***	***Base***

Proximity to:

Highways	101
Airports	
Railways	SMART
Waterways	San Rafael Creek
Schools	Dominican U, Bashia Vista ES, James Davidson MS, Laurel Dell
Land Use	

Project Issues	Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wildlife; Growth Inducing; Landuse; Cumulative Effects
Reviewing Agencies	Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 3; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received	12/15/2016	***Start of Review***	12/15/2016	***End of Review***	01/30/2017

Note: Blanks in data fields result from insufficient information provided by lead agency.

LETTER A2
State of California Governor's Office of Planning and Research

A2-1 This comment confirms that the State Clearinghouse received the DEIR and submitted it to applicable agencies for review. The only comment received in response was from the California Department of Transportation, which is Letter A3.

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STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
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January 26, 2017

04-MRN-2016-00029
SCH # 2016121043

Mr. Dan Zaich
San Rafael City Schools District
310 Nova Albion Way
San Rafael, CA 94903

San Rafael High School Implementation Plan – Draft Environmental Impact Report (DEIR)

Dear Mr. Zaich:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans *Strategic Management Plan 2015-2020* targets aim to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the DEIR and include comments not addressed from the previous letter sent September 6, 2016.

Project Understanding

The proposed project includes building demolitions, renovations, and new construction for the campus of San Rafael High School that would result in the addition of 48,222 gross square feet (gsf). Approximately 84,015 gsf in 12 buildings (including bleachers and concession stands) would be removed and 132,237 gsf in 10 new buildings would be added to the site. At completion, about 327,892 gsf of building area would be provided on the campus in buildings that would be one or two stories in height. Total on-campus enrollment would increase by 200 students while no new staff or faculty are projected. Ingress and egress to the project will be provided via the US 101 north and south ramps at the Central San Rafael exit.

A3-1

Transportation and Traffic

Figure 4.12-3B: Intersection #23: The southbound (SB) Route 101 on-ramp from 2nd Street (AM and PM peak hour) volumes are approximately 23% and 25% lower than the volumes in Caltrans' inventory (see table below). Please review the numbers and reconcile.

A3-2

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Peak Hour	Figure 4.12-3B volumes	Caltrans' Inventory Volumes	Difference
AM	2285	2980	23%
PM	1803	2420	25%

A3-2

Cultural Resources

- In Section 4.4-12 of the DEIR, the text states that the District has not received a request from a tribe to be placed on the agency's consultation notification list for CEQA projects, per Assembly Bill 52. However, Native Americans had a year (July 1, 2015 to July 1, 2016) to submit such letters to agencies, and during the interim it was recommended that agencies refer to the list of Native American contacts generated as a result of Senate Bill 18 or to contact the Native American Heritage Commission (NAHC) to identify tribes, groups, and individuals who may have knowledge of the project area. We recommend that the San Rafael City School District conduct Native American consultation in support of the project. A3-3
- The project area is sensitive for both buried and submerged archaeological deposits, and there are known archaeological sites in the vicinity of the project area. We recommend that the San Rafael City School District consider conducting subsurface testing to identify archaeological sites. We also recommended that consultation be initiated with the State Historic Preservation Officer (SHPO) regarding all determinations of eligibility for listing on the National Register of Historic Places (NRHP) as such determinations are not valid unless concurred upon by the SHPO.

Vehicle Trip Reduction

The following comments need to be addressed in addition to the Transportation Demand Management (TDM) measures proposed in the September 6, 2016 letter:

- The to-be-developed TDM program in TRANS-1a should not only consider promotion of carpool trips and designate specific on-site carpool-only parking spaces, but should fully develop a carpool program with effective incentives and disincentives. The TDM program shall also contain target goals of specific reductions in percentage of drive-alone and pick-up/drop-off trips, and a target goal of a specific reduction in on-site vehicle parking spaces. A3-4
- It is unclear what the net impact of TRANS-5 is. Will implementation of the Master Facilities Long-Range Plan *increase demand* for bicycling along key routes, including roadways and sidewalks, and across crosswalks? If so, under current roadway conditions on 3rd Street and surrounding routes, that would lead to increased potential conflicts between vehicular traffic and bicycle traffic. If that is correct, please address these issues and implement mitigation measures to provide solutions to these potential roadway conflicts. A3-5
- Include an additional mitigation measure for the District to work with the City and its consultant in developing and later on, implementing, the San Rafael Bicycle & Pedestrian Plan Update that is currently underway. This should include targeted outreach to students and parents such as surveys (with more specific data including travel distance that was not part of the "Student Arrival and Departure Tally Sheet" and "Supplemental Questionnaire"), A3-6

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presentations, and walk and bike audits. Such outreach would help evaluate safety and accessibility issues related to walking and bicycling routes.

- The District should work with the City to incorporate the feasibility study of a new bicycle and pedestrian pathway to serve the school campus (TRANS-5b) into the San Rafael Bicycle & Pedestrian Plan Update.
- We encourage the District to work with the Marin County Bicycle Coalition and Marin Safe Routes to School to develop and promote Bike to School Day events, class team bike challenges, and educational programs on traffic safety. A3-6
- We also encourage the District to consider participating in the 511.org SchoolPool RideMatch service to promote walking, biking and carpooling to school. Doing so will reduce impacts on the state highway system.

Should you have any questions regarding this letter, please call Erik Bird at 510-286-5521 or Erik.Bird@dot.ca.gov.

Sincerely,

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

LETTER A3
California Department of Transportation, District 4

A3-1 As part of Mitigation Measure TRANS-1a, the District would develop a TDM program that would include measures to decrease the vehicle miles traveled to and from the SRHS by increasing the number of students and faculty who walk and bicycle to school.

A3-2 Comment noted. Intersection turning movement volumes in the DEIR are based on a traffic network model provided by the City of San Rafael. A review of the volumes presented by Caltrans indicates that the volumes in the City model may be lower than those in the Caltrans database. However, the impact analysis focused on the project's potential contribution to vehicular volumes at the northbound and southbound Highway 101 ramps. As shown in Table 4.12-14 of the DEIR, the implementation of the Master Facilities Long-Range Plan would add 5 to 17 vehicles during the morning and afternoon peak hour to segments of Highway 101. These added traffic volumes would represent less than 0.1 percent of the traffic volumes both in the City model and in the Caltrans inventory. The results of the project contribution analysis would remain consistent with information presented in the DEIR.

A3-3 This comment (1) recommends that the District conduct Native American consultation for the project; (2) states that the project area is sensitive for both buried and submerged archaeological deposits and recommends that the District consider subsurface testing to identify archaeological deposits; and (3) recommends that consultation be initiated with the State Historic Preservation Officer (SHPO) regarding all cultural resource determinations for eligibility for listing in the National Register of Historic Places (NRHP).

As explained in Response to Comment A1-2, consultation with local tribes pursuant to AB 52 was not completed prior to publication of the DEIR as no local tribe had requested, either verbally or in writing, to be on the District's notification list for CEQA projects. As a result, the District is not required to consult with tribes for this DEIR. The District is sensitive to Caltrans' concerns regarding this issue, however, and has contacted the FIGR Tribal Heritage Preservation Officer (THPO) to solicit the tribe's comments on the project. Please refer to Response to Comment A1-2 for further detail.

Regarding the sensitivity of the project area for buried archaeological deposits, the District recognizes the potential for buried archaeological deposits to occur in portions of the SRHS campus. The District, however, believes a formal program of geoarchaeological testing, including boring and/or trenching, is not warranted now. The *potential* for subsurface deposits is not a sufficient threshold to conduct this testing, particularly since: (1) there are no recorded archaeological deposits on or adjacent to the campus; (2) mass grading of the campus has occurred, which reduced the potential for intact archaeological deposits, should such deposits be present; and (3) for most of the proposed construction, ground disturbance would be relatively limited in depth. If archaeological deposits or human remains are identified during construction, these would be handled in accordance with the Mitigation Measure CULT-1, CULT-4, CULT-7, and CULT-10, and a qualified archaeologist would make project-specific recommendations at that time, which may include geoarchaeological study.

Consultation with the SHPO is required for undertakings that are subject to Section 106 of the National Historic Preservation Act. The Master Facilities Long-Range Plan is subject to the requirements of CEQA but is not subject to Section 106, as no federal funds or permits are sought or required. Under CEQA, cultural resource determinations for eligibility are made for the California Register of Historical Resources (CRHR), not the NRHP (see 14 CCR Section 15064.5(a)(3)). Determinations of eligibility for listing in the CRHR do not require SHPO consultation and concurrence.

A3-4 Comment noted. Please see Response to Comment A1-8.

A3-5 As discussed under Impact TRANS-4 and Impact TRANS-5, the number of students walking and bicycling along key routes would increase if the Master Facilities Long-Range Plan is implemented. The implementation of Mitigation Measures TRANS-5a through TRANS-5c, as feasible, would reduce the project's impacts to less-than-significant levels by improving pedestrian and bicycle facilities on and surrounding the SRHS campus, as detailed on pages 4.12-42 and 4.12-43 of the DEIR. Pedestrian and bicycle facility improvements are also recommended as part of Mitigation Measures TRANS-4a and TRANS-4b. The improvements would facilitate pedestrian and bicycle travel to and from the campus. Mitigation Measure TRANS-5b addresses working with the City and Marin County's Safe Routes to Schools program in efforts to obtain a grant to conduct a study of the feasibility of implementing a bicycle and pedestrian pathway along the 4th Street corridor. The study would identify any net impacts of any proposed pathways. If feasible, the design and construction of this pathway would enhance safety around the SRHS campus by separating campus-bound pedestrian and bicycle traffic from vehicular traffic. This would reduce potential conflicts with vehicular traffic along adjacent streets. Off-site bicycle and pedestrian circulation and improvements are under City jurisdiction and require City approval. Implementation of Mitigation Measures TRANS-4a, TRANS-4b, TRANS-4c, TRANS-5b, and TRANS-5c would requirement involvement of the City of San Rafael and Marin County's Safe Routes to School program, and would also be subject to available funding, which is unknown. Therefore, the District cannot ensure or commit to implementation of these measures, and Impact TRANS-4 and TRANS-5 would be significant and unavoidable as indicated in the DEIR.

A3-6 As part of the TDM program, the District would conduct periodic monitoring of transportation demand at SRHS. This would include surveys of students regarding their travel modes to and from school. Additionally, SRHS would participate in the countywide Safe Routes to School program and would conduct walking and bicycling audits to identify operational, physical, and safety obstacles that affect students' ability to walk and bicycle to and from school. Please refer to Mitigation Measures TRANS-1a, TRANS-4c, and TRANS-5c.

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B. PUBLIC AND PUBLIC INTEREST GROUP COMMENTS

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LETTER B1

P. O. Box 150266
San Rafael, CA 94901
www.montecitoresidents.com

Date: January 26, 2017
To: Dr. Dan Zaich, San Rafael City Schools
Re: San Rafael High School – Comments in Response to the NOA for the San Rafael High School Master Facilities Long-Range Plan and Stadium Project Draft Environmental Impact Report

cc: San Rafael School Board, Superintendent of Schools, Chris Thomas
Department of Public Works Director, City of San Rafael
Community Development Director, City of San Rafael
City of San Rafael Mayor & City Council
SRHS Principal
The Federation of San Rafael Neighborhoods
North San Rafael Coalition of Residents

Dear Dr. Zaich:

Montecito Area Residents' Association (MARA) is the neighborhood association for the neighborhood which includes San Rafael High School and the area of residences around it. Our neighborhood is one of the oldest residential neighborhoods in San Rafael; much of it was built in the late 19th and very early 20th centuries. SRHS is located at the bottom of a bowl formed by hills on three sides. The hills are covered with houses and apartment buildings. The street infrastructure reflects the age of the neighborhood. Most streets in the neighborhood above SRHS are narrow, winding, and steep. Most of our streets lack sidewalks, and blind corners abound. Our neighborhood is very diverse and densely populated. B1-1

MARA supports the effort to update and improve SRHS facilities for the students of San Rafael. We are pleased that there has been an initial Campus Plan EIR to study the possible negative impacts of both the Stadium Project and Future Master Plan and how

they might be mitigated. However in addition to some clarifying questions we also have some concerns. B1-1

Timing: The timing of the EIR release combined with the 45 day feedback window (minimum legal requirement) is disappointing. By publishing the report on December 15, two full weeks of review and feedback were effectively eliminated while offices were closed and residents were traveling/busy with the holidays. That on top of the brief feedback window would seemingly leave the city and other impacted organizations scrambling to get the right reviews/approvals/analysis in enough time to provide a fully vetted and proper response. We are concerned that unforeseen issues could arise because of this- issues that could impact the surrounding neighborhood, render some of the proposed mitigation measures as insufficient and/or actually exacerbate dangerous conditions. B1-2

Traffic and TRANSPORTATION: The EIR traffic findings confirm the existance of issues that MARA has been trying to get addressed for the last 20 years. Most notable findings in the report:

- 60 percent of the school's vehicular traffic uses Mission Avenue (vs 40% using 3rd St).
- Traffic levels on Mission Street between Union Street and Belle Avenue can reach up to 500 vehicles per hour, with a substantial portion of this traffic consisting of school drop-off or pick-up trips
- These vehicles illegally park along the no-parking zone, impede sight lines along the blind curve at the Mission Avenue/Belle Avenue intersection, wait within the travel lane or circling around the neighborhood streets
- Adding to the danger, the study captured on average 16 U-Turns during morning peak hours at alice/mission (an intersection immediately following the aforementioned blind curve)

Traffic is one of the most significant impacts identified by the future changes, yet there are no confirmed plans, budget allocated or mitigation efforts that can be immediately implemented that will have significant impact on the issue. On top of an already bad situation, the projected 200-student increase would: B1-3

- Generate an additional 105 vehicle trips along local streets, including Mission Avenue.
- Would degrade weekday morning peak hour operations at the Union Street/Mission Street intersection from LOS D to LOS F conditions.
- Cause traffic delays through the Union/MIssion all-way stop sign-controlled intersection averaging over 1 minute per vehicle, resulting in recurring back-ups along each of the intersection's roadway approaches.
- Increase the total number of neighborhood parking spaces absorbed by over 20 parking spots in a densely populated neighborhood where parking is already at a minimum.

The current traffic and parking situation is unacceptable and dangerous by both City Standards (multiple intersections already have a LOS- D or F ratings) and quality of life standards for the residents. There have been numerous accidents and near serious accidents illustrating it is not just an inconvenient situation, but a dangerous and potentially liable one.

MARA requests that more impactful measures should be taken to **decrease** school traffic on Mission, versus focusing the majority of efforts on making travel down Mission **easier** for school traffic. Is unacceptable for the neighborhood to bear the brunt of the traffic issues when the front of the school, the major thruway and parking lot are all on 3rd. MARA asks for a separate proposal to address the traffic issues in the neighborhood so that the LOS ratings on Mission can be brought up to acceptable levels, and so that a significant decrease in the total percentage of school traffic using Mission Ave vs 3rd Street is achieved by the plan. **B1-4**

MARA also asks for a more complete study of the proposal to add lanes at Mission and Union Streets and extending the pick-up/drop-off lane on Mission. These improvements could have **unintended consequences**. For example, adding lanes might make it a more desirable route for pickup and drop off due to improved traffic flow so parents will continue to use this as a drop-off location and tell others of improvements, leading to new users. It would also likely require improved crosswalk protection as this is a busy pedestrian corner with a bus stop. **B1-5**

Finally, The sidewalk construction on Mission should continue at least to the intersection of Mission and Jewell, ideally up the hill to Embarcadero. This area is used by students who park on Jewell and up the Mission St hill. Often walking in the street to school. Families from out of town for swim events and basketball often park up the hill and walk in the street until they reach a sidewalk (especially those with strollers!). **B1-6**

Change of Address: We have been requesting this change of address for over 2 years, and are told it is “in the works”, but somehow it has not happened. Since the EIR notes that the majority of the traffic mitigation measures are “not assured” and that the impacts will be “significant and unavoidable”, the urgency around fixing the address is heightened. Changing this is in the School’s control and will help minimize unintentional neighborhood traffic. MARA requests a written commitment to change the address, a designated owner for this effort and a timeline for activities needed to complete.The EIR suggests: “Providing wayfinding signage and informational material (e.g., flyers, emails, etc.) to visitors prior to major sports and/or special events that would direct traffic to the 3rd Street driveways. MARA requests that the change of address and wayfinding informational material be easily accessible on the school and district webpages especially those used by outside users e.g. basketball leagues and Swim Marin. **B1-7**

Facilities Use Plan: This study was done in response to the progress of the Football Stadium Plan and overlays the future Master Plan. Yet it only addresses future use of the stadium, with no comprehensive look at the total sport facility usage including the basketball gyms and the pool. Two users not mentioned are the community basketball league(s) and Swim Marin. These groups greatly impact neighborhood parking and traffic during events and practice sessions. What other groups that use the gym and pool are not listed? Please include them. As requested in the past MARA asks that a SRHS Management Plan for the Use of the all SRHS Facilities be completed. **B1-8**

Construction Noise: The EIR recommends that construction activities (like pile driving and jack hammering) should take place outside of school hours- meaning in the evening and weekends – when most residents are home and expecting quiet enjoyment. MARA is concerned about these planned hours of construction. When would the construction occur? If the noise hours are limited by by both the EIR and City of San Rafael Noise Ordinance, does that extend the period of time needed to complete the work (thus extending the noise)? MARA requests participation in the proposed Construction Noise Mitigation Plan to ensure the impact on residents is minimized.

B1-9

Indian Rock or "Eagle Rock" Preservation: The rock on Mission Street is not mentioned in the EIR as a Cultural or Aesthetic resource, however neighbors and many alumnae believe it is and fear its removal. As the school site expanded its prominence and access was limited when the Gyms were built. However, a recent school signage project recognized it with a sign, indicating it is still important in school lore. MARA requests that that it be included in landscaping plans and not destroyed.

B1-10

Aesthetics: The EIR states that "New buildings shall be designed in a color scheme that is compatible with the neutral and earth-tone colors of existing buildings, with accent colors used for specific detailing." Residents request that staff apply this aesthetic to future athletic fence synthetic coverings including painting of fences or other structures around all athletic areas specifically the tennis courts (newer red cover is an eyesore!), soccer, baseball and football fencing that is seen by neighbors.

B1-11

It is our hope to work collaboratively to ensure that the use of native drought resistant plants is a priority over ornamental alternatives that are considered habitat plants. We request the evaluation and possible removal of specific invasive trees and shrubs on Mission between Belle and Embarcadero. The EIR states that "New evergreen tree plantings shall occur along Mission Avenue to screen campus buildings from view, and to screen parking areas from view." "Screening" by trees is not necessarily a priority for all parts of Mission Ave. Residents who have one, appreciate their view of Mt. Tam behind the school. MARA requests that Neighbors are able to participate in landscape planning in more than one public meeting.

B1-12

Clarifying Questions

MARA requests additional clarification around the topic areas outlined below. For ease of use, the questions/comments are noted with the associated impact and/or mitigation measure codes found in Table 2-1 of the report.

General

B1-13

1. The EIR outlines a number of mitigation measures. Is the implementation of these measures required? If the answer is:
    a. **yes all measures must be implemented**: what body monitors the efforts to ensure they are implemented throughout the course of the project? Is budget and

resources allocated to complete these measures? If not where will it come from? What will be the impact on the project (time/cost) to implement all the measures?

b. **Some, but not all of the measures must be implemented**: what efforts are required vs nice to haves? What decision making criteria is used to determine must vs nice to haves? Who or what bodies make the final call? When will the community know which will or will not be implemented? Are there any avenues to contest the decision made to not implement certain measures? **B1-13**

c. **no, none of these measures have to be implemented**: Are there any avenues to contest the decision made to not implement certain measures?

Aesthetics:

1. **AESTHETICS-1 (Development could substantially degrade existing visual character)**
   a. AESTHETICS-1c: Can you confirm that the neutral and earth tone color scheme measure also applies to future athletic fence synthetic coverings including painting of fences or other structures around all athletic areas specifically the tennis courts, soccer, baseball and football fencing that is seen by neighbors? **B1-14**
   b. AESTHETICS-1f: Will native drought resistant plants be used? **B1-15**
   c. AESTHETICS-1f: Will neighbors be invited to participate in the landscape planning meetings, in addition to the one public hearing? **B1-16**
   d. AESTHETICS-1f: Can you clarify what area of Mission will receive the new evergreen tree plantings? **B1-17**
   e. AESTHETICS-1f: Can the plan also include an audit of trash receptacles and location on the campus? Currently there are inadequate receptacles on the Mission Ave side of the school leading to trash in the streets. **B1-18**
2. **AESTHETICS-2 (Permanent Increase in light and glare due to lighting of facilities/outdoor areas)**
   a. Can you provide current levels of light spillage into the neighborhood and what the anticipated levels of spillage will be after the addition of new pathway, sign and parking lighting?
   b. Is there a diagram where new lights will be added?
   c. Which lighting would receive motion activated technology? If not all, is there a prioritized list? **B1-19**
   d. What type of lighting will be provided ensure the parking and traffic signage is clear and visible for evening and night time events?
   e. Can you confirm that any permanent LED lighting installed will have minimized blue-rich lighting for community and public health?
3. **AESTHETICS-3 (Increased light and glare for lighting Stadium Project)**
   a. Can you confirm that this line item is referencing lighting specific to the demolition and construction associated with the stadium project? **B1-20**

b. The mitigation measure states light timers will be set for 11pm. Can you clarify the expected times of construction? Why would project lighting be needed so late?
c. Is there an estimate of the light spillage that will take place in the neighborhood as a result of the construction?

B1-20

Air Quality

1. **AIR-1 (Could violate air quality standards or contribute substantially to a violation)**
    a. Will the air quality be measured at certain intervals during the project? If so how often? Will the results be posted in a public location for the community?

B1-21

2. **AIR-2 (Could expose sensitive receptors to substantial pollutant concentrations)**
    a. Can you define what these sensitive receptors are? Where are they located?
    b. How and how often will their exposure impact be measured?
    c. Will the surrounding area be notified?

B1-22

Biological Resources:

1. **BIO-1 (Adverse impact on nesting birds)**
    a. Per current schedule, the construction of the stadium will take place during nesting season. Can you confirm that the focused survey for nesting raptors will be scheduled?
    b. What qualifications are required for the hired biologist?
    c. Will the survey results be shared with the public? If so when and how.

B1-23

Hazards and Hazardous Materials

1. **HAZARDS-1 (Demolition of structures could expose public to hazardous materials)**
    a. What efforts will be made to contain the airborne debris and substances?
    b. How and how often will the levels of these hazardous materials be measured?
    c. Will the results be shared with the community?
    d. Where will hazardous materials be routed through campus/streets?
    e. What hazardous materials are soil based vs airborne?
    f. How long will each of these materials pose a risk to the public?
    g. Can/will the public be notified when work is being done that will potentially displace any of these hazardous materials?
    h. Does the installation or composition of any of the new construction materials pose toxin/hazard risks?

B1-24

Noise

1. **NOISE-1 (Permanent Increase in ambient noise levels in excess of general standards in local general plan/noise ordinance/etc)**
    a. Where are the residential noise receptors that will measure levels located?
    b. What is the expected permanent increase in ambient noise level?

B1-25

c. Does this measure and take into consideration the bowl shape around the stadium and the sound traveling up hillside?

B1-25

2. **NOISE-2 (Periodic Increases in ambient noise due to development under the plan)**
   - **a.** What is the noise level generated by the existing PA at 50 feet outside the fence line? 100 feet?
   - **b.** Does this take into consideration the bowl shape around the stadium, and the sound travel up the hillside?

B1-26

3. **NOISE-3 (Temporary Increase in ambient noise levels due to construction)**
   - **a.** NOISE-3A: The mitigation measure states that construction should take place outside of school hours- meaning in the evening and weekends – when most residents are home and expecting quiet enjoyment. What are the targeted hours for construction? Earliest and latest? What weekend days?
   - b. Will the Construction Noise Mitigation Plan be shared with the residents, and will the residents be able to provide input into the plan prior to finalization?
   - c. NOISE-3B: What are the site specific noise attenuation measures that will reduce noise levels to below 70 dBA?
   - d. NOISE-3B: Should residents expect the same maximum interior noise levels (45dBA) as is expected for the students?
   - e. NOISE-3B: Will construction trucks and vehicles exclusively use 3rd Street for entry/exit of property?
   - f. NOISE-3B: Where will the construction staging area be located?
   - g. NOISE-3B: Will the Construction Traffic Plan be shared with the neighborhood?
   - h. NOISE-3C: Will the complaint log (and how they were addressed) be made available to the public or MARA?

B1-27

4. **NOISE-4 (Excess ground borne vibration or ground borne noise levels)**
   - a. Is the pile driving expected to take place outside of school hours?
   - b. What areas of the property will require pile driving?
   - c. Will the school provide a structural engineer to evaluate a resident's property if it is within the potential damage zone?
   - d. What are the mitigation measures in place should a resident's property show damage or lodge a complaint due to the construction activity?

B1-28

Transportation/Traffic

1. **TRANS-1 (Increased vehicular traffic will degrade traffic flow along key roadways)**
   - a. TRANS-1a: Will all of these measures be implemented? If not when will the community learn which will or will not be?
   - b. TRANS-1a: Will the community be invited to participate in the create of the Transportation Demand Management Program?
   - c. TRANS-1a: The development and implementation of a TDM plan can be started immediately. When does the district plan on starting this project?
   - d. TRANS-1a: What measures will be put in place to inform civic organizations and visiting schools of the parking/pick-up/drop-off instructions?
   - e. TRANS-1a: What does "work with" the Athletic Dept. mean? Will a concrete and measurable plan be put into place?

B1-29

f. TRANS-1a: Who will provide the personnel for monitoring pick-up/drop-off? Will it be paid? Volunteer Parents? What timeframes will this monitor be in place? Will they cover sporting events as well? How will this be enforced?
g. TRANS-1a: Will the school consider removing the seating area outside the gym on Mission to discourage pick-up/drop off at that location?
h. TRANS-1a: Will the school consider making the Gym exits and security gates in the blind curve on Mission "Exit Only" or "Emergency Exit Only" to discourage congregation and traffic pick-up in that area?
i. TRANS-1a: How often is the periodic monitoring of traffic expected to happen?
j. TRANS-1a: Will anything be done with the sitting area between the gym and school buildings? It encourages pickups and drop offs by cars that stop in the red zone on the blind curve.

B1-29

k. TRANS-1b: This should be a priority and the language should include the U.S. Postal Service. Through research steps to change the address are simple and should be feasible
l. TRANS-1b: Will this also include updating the public website (and associated google pages/search engines) with the new address? If not can it?
m. TRANS-1b: Will this also include asking other sites (Marin swim, district schools playing at SRHS, etc.) to update the new address on their websites as well? If not, can it? Through a MARA audit, there are several other sites pointing visitors to the wrong address. If this isn't rectified it will limit the impact of officially changing it.

B1-30

2. **<u>TRANS-2 (Addition of project generated traffic on Mission, will deteriorate traffic flow, presenting a safety hazard)</u>**
   a. TRANS-2a: There is already an EIR identified problem of parents making a U-turn at the intersection of Alice & Mission, after dropping off their kids. What is the expected traffic flow once they are dropped off? How will that impact the neighborhood streets?
   b. With the addition of an extended drop-off lane, what is the expected increase in traffic on Mission?
   c. With regards to loss of parking with an extended loading zone: Could it be a designated Loading Zone during certain hours 7am to 7pm and parking allowed 7pm to 7am?
   d. TRANS-2a: Will there be monitoring to determine if this addition will lead to more hazardous turnarounds? If so what are the mitigation measures?
   e. TRANS-2a: Does the school have budget to implement these changes?
   f. TRANS-2a: If there is no budget exists currently, what is the process for securing funds to pay for the efforts?
   g. TRANS-2a: What if the city does not approve the work? What happens?

B1-31

   h. TRANS-2b: Is there any idea to where this remote pick-up site will be? This could address both traffic issues on 3rd and Mission ave.
   i. TRANS-2b: Has the City's Public Works Department been given adequate time to review and make a decision on this mitigation measure? If not, will time be given for them to do so before moving forward?

B1-32

j. TRANS-2b: What is the process of working with the city on this measure? What would community involvement look like?
k. TRANS-2b: Does the school have funding set aside or available to implement this?
l. TRANS-2b: Speed has not been mentioned as a danger or issue, but it is a well observed danger on Mission Avenue. Was speeding considered? Were mitigation efforts to minimize speeding reviewed?

B1-32

3. **TRANS-3 (Additional traffic could cause delay, degradation of service to LOS-F at one intersection and significant impact as defined by the City of San Rafael)**
   a. TRANS-3a: There is already significant traffic on Mission Avenue. By making access easier for school traffic, what is the expected impact? Will this increase traffic?

B1-33

   b. TRANS-3b: What would the impact be of permanently removing 8 parking spaces? Will this push more cars into the neighboring streets? If so, what is the impact to the long term and overnight parking situation (IE non-school hours)?

B1-34

   c. TRANS-3c: What are the implications of removing the passenger loading zone on the south size of Mission? Where would those parents drop off/pick up their children? Would this create even more congestion as they stop in the street instead?
   d. TRANS-3c: Has will the construction of the new fire station, and stop light impact this?
   e. TRANS-3c: Does the school have budget to implement these changes?
   f. TRANS-3c: If there is no budget exists currently, what is the process for securing funds to pay for the efforts?
   g. TRANS-3c: Has the City's Public Works Department been given adequate time to review and make a decision on this mitigation measure? If not, will time be given for them to do so before moving forward?
   h. TRANS-3c: Has enough time been given to consider the unintended consequences of this suggestion? For public review and debate?

B1-35

4. **TRANS-4 (Increased number of students walking and biking along key routes)**
   a. TRANS-4a: Has the City of San Rafael been given adequate time to review and make a decision on this mitigation measure?
   b. TRANS-4a: Where will the budget for these changes come from?
   c. TRANS-4a: Is the budget already allocated?
   d. TRANS-4a: If there is no budget exists currently, what is the process for securing funds to pay for the efforts?
   e. TRANS-4a: Why does the construction of a sidewalk on Mission just east of Belle only cover 100 feet? The entire length is used for parking, causing students and families to walk in the street until they hit a sidewalk.
   f. TRANS-4a: Does adding a sidewalk remove informal parking areas (day or night)? If so, how many and what is the potential impact to the neighborhood as those spots become unavailable? Note we 100% support adding a sidewalk the full length, but want to understand total impact.

B1-36

g. TRANS-4b:Has the City of San Rafael been given adequate time to review and make a decision on this mitigation measure?
h. TRANS-4c: Has the City of San Rafael Public Works Department been given adequate time to review and make a decision on this mitigation measure?

B1-36

5. **TRANS-5 (Increased bicyclists on roadways, with current conditions discouraging use)**
   a. TRANS-5b: Has the City of San Rafael been given adequate time to review and make a decision on this mitigation measure?
   b. TRANS-5b: What is the estimated timeline for securing the grant, completing the study and arriving at a conclusion.
   c. TRANS-5b: If changes are deemed necessary, where does the budget come from?
   d. TRANS-5b? If there is no budget exists currently, what is the process for securing funds to pay for the efforts?

B1-37

6. **TRANS-6 (Construction-related vehicle trips creating traffic hazard):**
   a. TRANS-6: Will the district ensure that any parking losses associated with construction vehicles will also not affect the residents and neighborhoods surrounding the school?

B1-38

7. **TRANS-7 (Construction conflict with the San Rafael General Plan Program)**
   a. TRANS-7: Will the community be able to see and add feedback to the Construction Traffic Mitigation Plan?

B1-39

Thank you for the opportunity to comment and ask questions. Please do not hesitate to contact MARA if you have any questions or concerns we are happy to clarify and participate in future studies.

Respectfully,
Board of Directors of the Montecito Area Residents' Association

Sherna Deamer
Sid Waxman
Bryn Deamer
Jackie Schmidt
Constanza Perry
Kristie Garafola
Tom Hurray
Ann Bauer

LETTER B1
Montecito Area Residents' Association (MARA)

B1-1 This is the introductory comment from the Montecito Area Residents Association (MARA) that explains the organization and some overall concerns related to road and sidewalk conditions in the vicinity of the SRHS campus. Responses to specific comments are provided below.

B1-2 The 45-day DEIR public review period did include the holiday period. SRCS was not able to extend the comment period, nor is such an extension required by CEQA, because the school calendar and the proposed construction schedule for the Stadium Project make it imperative that construction begin in April 2017 if the project is approved. Potential environmental impacts in the surrounding neighborhood are addressed in the DEIR, and mitigation measures are recommended.

B1-3 The commenter expresses concerns over past and existing traffic conditions. In determining whether a project's impacts are significant, an EIR must compare those impacts with "baseline" conditions, which are existing environmental conditions. While past traffic issues are not the subject of the DEIR, Section 4.12, Transportation and Traffic, of the DEIR identified existing transportation conditions near the SRHS campus and the potential impacts that would result from the implementation of the Master Facilities Long-Range Plan. Several field visits were conducted to observe traffic operations during pick-up and drop-off activities on a regular school day. Additionally, field visits were conducted during a major sporting event (football game held on October 21, 2016) at the school stadium. Observations made during these field visits informed the traffic data analysis and impact identification for the DEIR. Impacts TRANS-1 through TRANS-7 detail potential project-related impacts as they relate to vehicular, bicycle, and pedestrian traffic, as well as those associated with construction activities, and mitigation measures are recommended. A detailed parking study was also performed and included in Appendix F-7 to the DEIR and referenced on page 4.12-14 of the DEIR. Please refer to Response to Comment A1-9.

B1-4 The District recognizes that the implementation of the Master Facilities Long-Range Plan would result in increased traffic within the vicinity of the SRHS campus, and has proposed Mitigation Measures TRANS-1 through TRANS-7, as feasible, to address identified impacts resulting from this increased traffic. As discussed in the DEIR, the implementation of these measures, if feasible, would reduce the project's transportation-related impacts to less-than-significant levels. It should be noted that the transportation impact analysis conservatively assumed that future travel mode shares would remain consistent with those under existing conditions. However, the implementation of Mitigation Measure TRANS-1a would reduce the number of single-student vehicle trips to and from the campus, thereby reducing the overall traffic congestion along surrounding streets.

Please see Response to Comment A1-11 for discussion of other project elements that have been considered by the District. The District would work with the City of San Rafael, as feasible, on the implementation of Mitigation Measure TRANS-3a. A preferred configuration for the Union Avenue/Mission Avenue intersection has yet to be finalized. However, the provision of additional turn lanes at this intersection would improve traffic flow and decrease overall intersection delay.

The CEQA Guidelines provide that the environmental setting as it exists when the EIR is being prepared be treated as the baseline for gauging the changes to the environment that would be

caused by the project. (14 Cal. Code Regs. Sections 15125(a) and 15126.2(a)). An additional traffic study is not considered necessary.

In addition, the District is working with the City to change the formal address of the high school to 3rd Street which would help to reduce overall traffic on Mission Avenue. See Response to Comment B1-7 below.

B1-5 As noted in Response to Comment B1-4, the District would work with the City, as feasible, on the implementation of intersection improvements at the Union Avenue/Mission Avenue intersection. A detailed analysis of intersection level of service improvements would be conducted to assess any potential impacts associated with the proposed intersection reconfiguration. As part of the TDM program to be developed under Mitigation Measure TRANS-1a, SRHS would work with community members to develop and implement strategies that would decrease the number of school-related vehicular trips to and from the campus.

B1-6 Field observations conducted for the DEIR confirmed that while there are students and campus visitors who travel to the campus via Mission Avenue east of Belle Avenue, the majority of visitors to the campus travel from the north and west side of the campus (i.e., west of Belle Avenue).

Extending the sidewalk along the south side of Mission Avenue to its intersection with Jewell Street would cost approximately $175,000, plus. At this time, the District cannot commit to funding this project because no source of funding for this project has been identified. This project would also require City involvement and approval.

B1-6 Field observations conducted for the DEIR confirmed that while there are students and campus visitors who travel to the campus via Mission Avenue east of Belle Avenue, the majority of visitors to the campus travel from the north and west side of the campus (i.e., west of Belle Avenue). Fewer than 10 percent of students walking/bicycling to or from SRHS access the school site via Mission Avenue east of Belle Avenue. The project would not significantly increase the number of students accessing the SRHS campus along this segment.

Extending the sidewalk along the south side of Mission Avenue to its intersection with Jewell Street would cost approximately $175,000, and would serve a limited number of students. At this time, the District cannot commit to funding this project because no source of funding for this project has been identified. This project would also require City involvement and approval.

B1-7 The District has been working with the City of San Rafael to change the school's address to reference the main campus entrance along 3rd Street. On February 1, 2017, the District received confirmation from the City's Community Development Department that the request has been approved and the City will proceed with the change of address.

Once the address change has been completed, the District will update the school address on the main website as well as on all printed material provided to the public. The District will also inform all community groups that use the school facilities to update the school address listing on their respective websites and other promotional material. As part of the TDM program to be developed under Mitigation Measure TRANS-1a, SRHS would provide all potential visitors to the campus (i.e.,

visiting sports teams, event participants etc.) with the new school address that would direct them to the driveways along 3rd Street. This change should reduce the number of visitors entering the campus from Mission Avenue.

B1-8 As stated on page 4.12-22 of the DEIR, the vehicle trip generation estimates for the proposed Stadium Project were based on a review of information provided by the District (and summarized in Table 3-3 of the DEIR) regarding the existing and proposed usage of the stadium (see Appendix F-5 of the DEIR). Existing use of the basketball gym and pool is not expected to be expanded and is not the subject of the DEIR. As discussed in Chapter 3, Project Description, of the DEIR, community activities are expected to continue but not to increase compared to existing conditions. The stadium would continue to be a facility shared by various on-campus sports teams and community members. Project-generated impacts at the stadium would be dependent on the events with an increase in either the number of spectators and participants for individual events or events with an increase in frequency throughout the year. The net change in attendance and/or frequency of events was evaluated, and the results of this evaluation are presented in Appendix F-5 of the DEIR. Of the four events with anticipated changes to either frequency of event or participation, lacrosse games would have the highest increase in event attendance (96 additional participants and 100 additional spectators); as such, this event was selected for analysis as it represents the largest anticipated increase in vehicle trip generation resulting from the project. As part of the TDM program to be developed under Mitigation Measure TRANS-1a, SRHS would identify specific strategies that would limit spillback of site-generated traffic and parking demand onto neighborhood streets.

B1-9 The commenter notes that Mitigation Measure NOISE-3a states that construction activities should be scheduled when school is not in session, to the maximum extent practical. The commenter asks whether this would mean that construction would take place in the evenings and weekends, when most residents are at home and expecting quiet enjoyment. The commenter also asks whether this would extend the period of time needed to complete the work, thus extending the duration of construction noise. The commenter requests that MARA be allowed to participate in the development of Construction Noise Mitigation Plans.

As stated in the DEIR, construction activities would be subject to the construction days and hours in the San Rafael Municipal Code, which permits construction between 7:00 AM and 6:00 PM, Monday through Friday, and between 9:00 AM and 6:00 PM on Saturdays. Mitigation Measure NOISE-3a could not be used as a reason to conduct work outside of these days and hours. Mitigation Measure NOISE-3a is intended to be implemented as part of a series of mitigation measures that address the potential impacts of construction noise on both on-campus and off-site receptors (Mitigation Measures NOISE-3a through NOISE-3d). Mitigation Measure NOISE-3a explicitly prohibits construction during established testing periods, but uses the language “to the maximum extent practicable” for all other circumstances because there may be circumstances when it is not feasible to construct a project entirely outside of school hours. The purpose of the mitigation measure is to minimize noise impacts to the maximum extent practical by, for example, scheduling the construction of a given component during the summer, instead of spring, if there is that flexibility. Mitigation Measure NOISE-3b is intended to protect students when such flexibility does not exist. The anticipated project schedule is described in Chapter 3, Project Description, of the DEIR, and the implementation of Mitigation Measure NOISE-3a would not affect this schedule because it would be applied only to the extent practicable. The commenter accurately notes that

any significant delays would involve a longer duration of the community's exposure to construction noise, as well as mounting project costs.

In accordance with Mitigation Measures NOISE-3d and NOISE-6, residences located within 250 feet of a project implemented under the Master Facilities Long-Range Plan shall be provided with written notice of construction activity within at least 10 days before work begins, except in the case of an emergency, and such notice shall include the contact information of the construction complaint and enforcement manager for the project. Contact information and complaint procedures would also be available on the SRCS Bond Program website (http://www.srcs.org/bond-program). The details of the Construction Noise Mitigation Plan would be included in construction contract documents, which would be available for public review on the SRCS Bond Program website.

Pile driving construction activities would not be necessary. Please refer to Response to Comment A1-6.

B1-10 The commenter indicates that "Indian Rock" or "Eagle Rock" is not mentioned in the DEIR as a cultural resource or aesthetic resource, and some neighbors to the SRHS campus fear the rock's removal. The commenter requests that the rock be included in landscaping plans and not destroyed.

There is no official record of "Indian Rock" or "Eagle Rock" on file at the Northwest Information Center, the State of California's regional repository for cultural resource records and reports for Marin County, and the rock is not an archaeological feature. The District does, however, acknowledge the importance of the rock as an aesthetic resource to some members of the community. The District acknowledges the commenter's preference to maintain the rock and for this feature to be included in landscaping plans. This preference would be considered when project-specific designs under the Master Facilities Long-Range Plan are prepared. The District has no immediate plans to remove the rock.

B1-11 Details for fencing have not been finalized. However, the District would consider the recommended compatible color schemes for future fencing associated with the Master Facilities Long-Range Plan. The District has reached out to members of the community, including MARA residents, to participate on the District's School Site Design Committee, which would continue to be part of the design process.

B1-12 Detailed landscape plans would be prepared as part of each project undertaken under the Master Facilities Long-Range Plan, and would include trees, shrubs, and groundcover species. The District is willing to work with neighbors as landscape plans are developed and make landscape plans available to the public in advance of approval. Additionally, Mitigation Measure AESTHETICS-1f requires development of a campus landscape management plan, which would be reviewed by the District Board at a public hearing that shall allow comments from the public. Public suggestions shall be considered prior to developing final landscape plans. However, the specific timing and format of such a collaborative effort have not yet been determined. The District realizes that maintaining long-distance views of Mt. Tamalpais should be considered in the selection of future trees on the Mission Avenue side of the campus.

B1-13 Mitigation measures included in the DEIR must be implemented by the District, as applicable. Where certain measures required a joint effort with the City of San Rafael or other entities, such as

Safe Routes to School, or if funding sources are unknown, the District cannot be fully responsible or ensure implementation, which is why the impacts in these cases were identified as significant and unavoidable in the DEIR. The Mitigation Monitoring and Reporting Program (see Chapter IV of this document) outlines the monitoring of each mitigation measure, and this program must be adopted by the Board at the time of final project approval and remain in place during construction and project implementation. The CEQA Guidelines set forth mitigation reporting and mitigation monitoring requirements (see generally, 14 Cal. Code Regs. Section 15097). Except for specified measures with unknown funding sources that require City involvement, funding would be provided as part of the overall bond program, which is financing the new campus construction. All of the measures identified must be implemented, except for those involving the City of San Rafael or other entities as discussed above; the District cannot ensure implementation of those measures, and therefore the related impacts have been identified as significant and unavoidable. The District would endorse the City's efforts to implement any unfunded measures.

B1-14 Refer to Response to Comment B1-11 regarding fencing and similar structures.

B1-15 The District plans to use drought-tolerant plantings in new campus planting schemes.

B1-16 Refer to Response to Comment B1-12.

B1-17 The specific area along Mission Avenue that would have evergreen tree plantings has not been determined, as the final building designs and landscape plans have not yet been developed. The District plans to keep the neighborhood aware of designs as they are developed and would continue to work with neighborhood representatives.

B1-18 The issue of trash receptacles does not relate to topics covered in the DEIR. However, the District has been made aware of this concern based on this comment, and will share it with appropriate personnel.

B1-19 No specific measurements of light spillage, existing or proposed, were included in the DEIR, and such measurements are not required under CEQA. However, the District has worked to reduce the wattage of light fixtures, as shown in Table 3-2 on page 3-13 of the DEIR. Since preparation of the DEIR, the District's landscape consultant has provided a graphic showing lighting intensity at the proposed Stadium Project, and this graphic is now included as a new Figure 4.1-5 and is shown in Chapter III of this document. The lights that would have motion sensors would be limited to path lights and parking lot lights. The parking lot and entry area would have pole lights to provide necessary illumination to see signage and markings on pavement. LED light color can be specified as "arm" 3000kelvin if desired, so as to minimize blue content. Figure 3-6 of the DEIR shows the new lighting posts as number "4" in the graphic. Six light poles are shown. Please also see discussion of Impact AESTHETICS-3 and Mitigation Measure AESTHETICS-3 on pages 4.1-14 and 4.1-15 of the DEIR.

B1-20 The lighting addressed in Impact AESTHETICS-3 is not associated with construction; it is associated with use of the reconstructed stadium area. No construction lighting is proposed during the construction period except for unusual circumstances where special work may be needed. Please refer to Response to Comment B1-9 for hours of construction, and to Response to Comment B1-19 regarding lighting intensity. As stated in Mitigation Measure AESTHETICS-3

(page 4.1-15 of the DEIR), timers would prevent any lighting of the Stadium Project fields after 11:00 PM to avoid visual disturbance for nearby residences.

B1-21 The commenter asks if air quality measurements of criteria air pollutants will be collected, how often, and whether they be available to the public.

Mitigation Measure AIR-1b requires an individual project under the Master Facilities Long-Range Plan to evaluate potential impacts on regional air quality standards from emissions of criteria air pollutants in accordance with BAAQMD CEQA Air Quality Guidance. The BAAQMD recommends using the California Emissions Estimator Model (CalEEMod) to evaluate the emissions of criteria air pollutants from an individual project. The BAAQMD does not require or recommend the collection of air quality samples to evaluate the potential impact from an individual land-use project. This is because the emissions of criteria air pollutants from an individual land-use project would not be localized to the SRHS campus. For example, the proposed Stadium Project would include emissions from vehicles traveling to and from home, as well as electricity generated off-site by Pacific Gas & Electric (see DEIR pages 4.2-17 through 4.2-20). Collecting air quality samples that would be considered representative of the criteria air pollutants being generated by an individual project under the Master Facilities Long-Range Plan is not technically feasible; therefore, Mitigation Measure AIR-1b requires individual projects to estimate emissions of criteria air pollutants based on conservative modeling and to evaluate the potential effects on regional air quality standards in accordance with BAAQMD guidance.

As discussed on page 4.2-5 of the DEIR, the BAAQMD currently monitors regional air quality from a network of over 30 stations. These data are made available to the public and may be found here: http://www.baaqmd.gov/research-and-data/air-quality-measurement.

B1-22 The commenter asks about the definition and location of sensitive receptors, measurements of exposure to toxic air contaminants, and public notification to the surrounding area.

The definition and location of sensitive receptors is provided on DEIR page 4.2-4, as follows:

> *The term "sensitive receptor" refers to a location where individuals are more susceptible to poor air quality. Sensitive receptors include schools, convalescent homes, and hospitals because the very young, the old, and the infirm are more susceptible to air-quality-related health problems than the general public. Residential areas are also considered sensitive to poor air quality because people are often at home for extended periods, thereby increasing the duration of exposure to potential air contaminants (BAAQMD, 2012a).*
>
> *Sensitive receptors on the SRHS campus include the 9th to 12th grade classrooms where children congregate throughout the school day. Other sensitive receptors near the SRHS campus include residences located immediately north and east of the campus.*

Mitigation Measure AIR-2 requires an individual project under the Master Facilities Long-Range Plan to conduct a project-level health risk analysis of diesel particulate matter (DPM) and fine particulate matter ($PM_{2.5}$) emissions during construction in accordance with the BAAQMD and Office of Environmental Health Hazard Assessment (OEHHA) guidance. The BAAQMD and OEHHA do not recommend or require the collection of air samples to evaluate potential health

risks to sensitive receptors during construction. As demonstrated for the Stadium Project (DEIR pages 4.2-20 through 4.2-23), concentrations of DPM and $PM_{2.5}$ are estimated at nearby sensitive receptors prior to construction by using an air dispersion model. Based on the estimated concentrations, a conservative health risk assessment is prepared to evaluate the potential impacts on nearby sensitive receptors during construction. If the health risks and hazards from DPM and $PM_{2.5}$ emissions would exceed the BAAQMD's project-level thresholds of significance, Mitigation Measure AIR-2 would require the use of exhaust-control measures to reduce the construction emissions and related health risks below the thresholds of significance. Because construction of individual projects under the Master Facilities Long-Range Plan, with mitigation, would not result in potentially significant impacts on nearby sensitive receptors, no public notification (beyond that provided in the CEQA process) is necessary.

B1-23 Mitigation Measure BIO-1 on page 4.3-10 and Mitigation Measure BIO-2 on page 4.3-12 of the DEIR have been recommended to ensure compliance with the federal Migratory Bird Treaty Act, and would be implemented as part of the Master Facilities Long-Range Plan. The measure calls for conduct of a preconstruction survey if some aspect of the Master Facilities Long-Range Plan may result in inadvertent take of bird nests in active use. If work is to be initiated during the nesting season (February through August), the focused survey would be conducted by a qualified biologist within 14 days prior to onset of vegetation removal or construction. This mitigation measure also applies to the Stadium Project, and, if the project is approved, the focused survey would be scheduled within the 14 days prior to the onset of vegetation removal or construction initiated during the nesting season. As stated in Chapter I, Section B of this Final EIR, the Notice of Availability for the DEIR was sent to the CDFW by the State Clearinghouse.

The obligation of the District is to comply with the provisions of the federal Migratory Bird Treaty Act and State Fish and Game Code, which provides more than adequate incentive to ensure that a qualified biologist is retained and that appropriate preconstruction surveys and construction restrictions are followed, if required. The qualified biologist would be retained by the District and must be experienced in the identification of native birds and conduct of nesting and preconstruction surveys. A report of finding would be prepared by the qualified biologist and submitted to the District for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season. The report must either confirm absence of any active nests or confirm that any young within a designated no-disturbance zone have fledged and construction can proceed.

Mitigation Measure BIO-1 does not include any provisions that the results of the preconstruction survey be shared with the public. However, this could be arranged directly with the District, if members of the public are interested.

B1-24 The commenter asks what measures would be enacted during demolition of structures containing hazardous materials to ensure that the community would not be adversely affected by these materials. The commenter asks about abatement procedures, transport, whether there will be public disclosure of abatement schedule and testing results, the nature of the contaminants and the duration of risk to the public, and whether new construction materials may pose similar risks.

The nature of potential hazardous materials related to the SRHS campus, including identification of soil-based vs. airborne materials, is discussed in Section 4.7, Hazards and Hazardous Materials, of the DEIR. The abatement of hazardous materials in buildings is highly regulated. Any contractor

removing asbestos-containing materials must be certified in accordance with requirements of the Asbestos Hazard Emergency Response Act (AHERA) and abatement is regulated under BAAQMD Rule 11-2. Lead-based paint abatement is regulated under The Certification and Work Practices for Lead-Based Paint and Lead Hazards regulations in Title 17 of the California Code of Regulations. The handling of other hazardous materials is regulated by state and federal rules implemented by DTSC and other agencies. Once removed, transport of these hazardous materials is regulated by rules implemented by the U.S. Department of Transportation.

The hazardous materials of concern under impact HAZARDS-1 include painted surfaces covered with lead-based paint and building materials such as flooring, roofing, and walls containing asbestos. Properly maintained, these materials do not pose a health risk unless they are demolished, when lead particles and asbestos fibers can be released to the air. Abatement under Mitigation Measure HAZARDS-1 and HAZARDS-2 would ensure that these materials are properly abated prior to demolition and work practices are in place, such as the use of negative pressure containment barriers, to prevent the release of these materials during abatement activities. This would prevent the hazardous materials from presenting a health risk to the students, school workers, or the general public during any stage of the abatement or demolition process.

Although there are no requirements for public disclosure of abatement schedules, disposal truck routes, or testing results, at each step of abatement and disposal, these existing regulations require measures to ensure that asbestos, lead, and other hazardous materials are not dispersed to the environment. For projects at public schools, such as the Master Facilities Long-Range Plan, there is additional oversight from the DTSC School Property Evaluation and Cleanup Program; the District is required to comply with this program under Mitigation Measures HAZARDS-1 and HAZARDS-2.

Compliance with these regulations and other existing regulatory requirements would ensure that the demolition of buildings potentially containing hazardous materials would not result in a significant impact.

New construction under the Master Facilities Long Range Plan would not pose similar risks, as materials would be subject to current requirements prohibiting the use of lead-based paint and asbestos. Similarly, manufacturing of polychlorinated biphenyls (PCBs) was prohibited in 1977, and PCBs are not present in new construction materials. Likewise, as discussed on page 4.7-11 of the DEIR, crumb rubber infill material would not be used in the new field for the Stadium Project.

B1-25 With respect to Impact NOISE-1, the commenter asks what the expected permanent increase in ambient noise would be, where the residential noise receptors are located, and whether the mitigation measure takes into consideration the bowl shape around the stadium and the sound traveling up the hillside.

As discussed on page 4.10-4 of the DEIR, off-site sensitive residential noise receptors include the following: 1) residences along Mission Avenue and Embarcadero Way, located approximately 40 feet at the closest distance to the north and east of the SRHS campus; and 2) retirement homes on 4th Street (San Rafael Commons), located approximately 60 feet at the closest distance to the west of the SRHS campus.

Permanent increases in ambient noise affecting residential noise receptors as a result of the Master Facilities Long-Range Plan could potentially occur due to the use of heating, ventilation, and air conditioning (HVAC) and other equipment, which would be considered in the HVAC system selection and acoustical shielding design. As described in Mitigation Measure NOISE-1, the nearest residential receptors to each new structure that would be constructed under the Master Facilities Long-Range Plan would be used to design the HVAC system acoustical shielding. Although this mitigation measure does not explicitly address homes on the hill slopes, designing the HVAC system acoustical shielding in a manner that protects the nearest receptors would also protect any receptors farther away, including those on hillside slopes. Although residences on the hillsides do not benefit as much from noise attenuation in the way that residences in areas of level topography do, the energy of sound still dissipates with distance, and therefore designing the system to protect the nearest receptors would provide the same or greater protection to receptors located farther away on the hill slopes.

For the reasons discussed in detail in the DEIR noise analysis, with the implementation of Mitigation Measure NOISE-1, there is not anticipated to be a perceptible increase in permanent noise levels as a result of implementation of the Master Facilities Long-Range Plan. A perceptible increase is defined on page 4.10-3 of the DEIR as an increase in noise levels of 3 dBA.

B1-26 With respect to Impact NOISE-2, the commenter asks what the noise level generated by the existing PA system is at 50 feet and 100 feet outside of the fence line. The commenter also asks whether the estimates take into consideration the bowl shape around the stadium and the sound traveling up the hillside.

The noise level measurements collected during a varsity football game on the SRHS campus on Friday October 21, 2016, are summarized in Table 4.10-3 of the DEIR. Two of the measurements were collected at the nearest residential receptors to the stadium, approximately 50 feet east of the fence line of the campus, adjacent to Embarcadero Way (see Figure 4.10-1 of the DEIR). This measurement was taken on the hillside east of the stadium, and therefore provides an accurate representation, reflective of the local topography, of the noise levels generated by the use of the stadium and its PA system during an event. Maximum noise levels generated at the residential measurement location while the PA system was in use varied from 75.4 to 81.7 dBA L_{max}. For 10 percent of the time, noise levels at this location exceeded 67.0 to 68.0 dBA, and it is assumed that many of these exceedances involved the use of the PA system because it was a contributor to three of the five highest noise levels measured during the football game (see Table 4.10-7 of the DEIR). Therefore, the PA system generates noise levels ranging from approximately 67 to 82 dBA at 50 feet from the fence line. Measurements were not taken 100 feet from the fence line because the City of San Rafael's noise standards for sound performances are based on a distance of 50 feet or more from the property plane, and the DEIR noise measurements were intended to capture noise levels at 50 feet in order to be conservative. Since the energy of sound dissipates with distance, noise levels generated by the PA system at 100 feet would be lower than the noise levels measured at 50 feet. Typically, noise from a point source decreases by 7.5 dBA by every doubling of distance over soft surfaces and 6 dBA over hard surfaces (Caltrans, 1998). The areas surrounding the stadium contain both hard (buildings and roads) and soft (vegetation) surfaces, and there are hills to the north and east of the stadium. Consequently, the exact reduction of noise with distance over a given area would vary depending on terrain and surface type.

B1-27 With respect to Impact NOISE-3, the commenter asks whether construction would take place outside of school hours because Mitigation Measure NOISE-3a states that construction activities should be scheduled during periods when classes are not in session to the maximum extent practicable. The commenter asks whether the Construction Noise Mitigation Plan, Construction Traffic Management Plan, and complaint log would be shared with the neighborhood. The commenter asks what site-specific noise attenuation measures would reduce noise levels to below 70 dBA L_{eq} at the nearest residential receptors, and whether residents can expect the same maximum interior noise levels of 45 dBA L_{eq} as are expected for the students. Lastly, the commenter asks where construction staging would be located and whether construction trucks and vehicles would exclusively use 3rd Street for entry to and exit from the SRHS campus.

In response to the commenter's first question, please refer to the Response to Comment B1-9.

The contract documents containing details of the Construction Noise Mitigation Plan and the Construction Traffic Management Plan would be made available for public review on the SRCS Bond Program website (http://www.srcs.org/bond-program). Additionally, the public would be able to review the complaint log any time by requesting access through the program manager. Please also refer to Response to Comment B1-9.

Due to the variety of different types of projects and locations proposed under the Master Facilities Long-Range Plan, multiple Construction Noise Management Plans would need to be prepared. The types of measures commonly used to reduce noise from construction activities are described in Mitigation Measure NOISE-3b. It is likely that the construction-generated noise levels would be achieved through the use of noise barriers around the construction site and any stationary equipment. Noise barriers can typically reduce noise levels by approximately 10 dBA, and greater reductions can be achieved if necessary.[2] As discussed on page 4.10-7 of the DEIR, a typical façade with windows closed provides a noise level reduction of approximately 25 dBA. Therefore, with the implementation of Construction Noise Management Plans, the interior noise inside nearby residences with windows closed would be approximately 45 dBA L_{eq}.

The locations of construction staging areas are described on page 3-22 in Chapter 3, Project Description, of the DEIR. The primary construction staging area would be located in the 3rd Street parking lot, with project-specific staging areas located in the immediate vicinity of proposed new buildings. Construction traffic would be routed exclusively through 3rd Street entrances to the SRHS campus. This information has been added to Chapter 3, Project Description, of the DEIR as described below.

Page 3-22 is modified as follows to clarify the issue of construction vehicle access to the SRHS campus:

> Construction trailers are proposed to be located at the 3rd Street parking lot to house offices for contractors. Additional items that may be located at the 3rd Street parking lot include contractor staff parking and materials storage. <u>Construction vehicles and trucks would be routed exclusively through 3rd Street entrances to the SRHS campus.</u>

[2] Caltrans, 2008. Federal Highway Administration, 2000. Highway Noise Barrier Design Handbook.

B1-28 With respect to Impact NOISE-4, the commenter asks whether pile driving is expected to take place outside of school hours, where pile driving is expected to be needed, whether a structural engineer would evaluate nearby residents properties to determine their susceptibility to damage from pile driving, and what means nearby residents would have if their property shows damage due to construction activity.

As discussed in Response to Comment A1-6, it has been determined that alternate structural foundation support system(s), such as drilled piers, auger pressure grouted piles, or thickened mat slabs would be used in lieu of driven piles. Because pile driving is no longer anticipated during construction under the Master Facilities Long-Range Plan, and because the nearest off-campus buildings are located approximately 40 feet from the SRHS campus, the nearest off-campus receptors would not have the potential to be exposed to construction-generated vibration levels in excess of the 0.3 inch per second (in/sec) threshold for damage to buildings of conventional construction (see DEIR Table 4.10-9).

B1-29 The commenter asks questions about Mitigation Measure TRANS-1a. Please see Responses to Comments A1-8, B1-3, and B1-13. If the project is approved, the District would work with community members, including MARA, to identify TDM strategies that would reduce SRHS-generated traffic congestion along neighborhood streets by increasing the number of students who walk, bicycle, ride transit, and carpool to and from school. The District plans to inform MARA of opportunities to participate in the TDM program development.

The District plans to include the Athletic Department in the development of the TDM program to identify strategies to limit traffic congestion and parking demand spillover onto neighborhood streets during major events.

Every 2 years, the District would monitor the operation and effectiveness of the TDM program. This would include monitoring of pick-up/drop-off activities to assess the effectiveness of existing TDM strategies and potentially identify improvements to the TDM program to better address traffic congestion concerns.

As shown in Figure 3-7 of the DEIR, the parking lot along Mission Avenue by the tennis courts would be reconfigured to accommodate the construction of a new building. Access to and from the lot would continue to be provided by a two-way driveway along Mission Avenue, but the reconfiguration would reduce the available parking at this parking lot. This parking reduction would be offset by the new parking lot south of the stadium. Use of the reconfigured parking lot along Mission Avenue would be restricted to use by faculty and staff during school hours.

While the methods and standards of the TDM program are sufficiently set forth in Mitigation Measure TRANS-1a, the specific details of the TDM program, such as the identity of personnel selected to monitor pick-up/drop-off and other details, are yet to be developed. These comments will be considered as the District moves forward in this effort.

The commenter also comments on existing conditions. These comments will be considered as suggestions for the development of the TDM program.

B1-30 Comment noted. Please see Response to Comment B1-7.

B1-31 The analysis and impacts presented in the DEIR are based on a conservative assumption that student travel modes would remain consistent with those under existing conditions. However, as feasible, the District would work with the City of San Rafael to implement Mitigation Measure TRANS-2a in concert with Mitigation Measure TRANS-1 through TRANS-7. Implementation of these measures, as feasible, would reduce the overall vehicular trip generation at SRHS and alleviate traffic congestion along Mission Avenue.

The comment is noted. The District would work with the City of San Rafael, as feasible, to identify appropriate times for the loading zone parking restrictions that would allow neighborhood residents to use on-street parking during off-peak hours for school pick-up and drop-offs.

The District would monitor student growth and conduct periodic monitoring of the TDM program to evaluate its effectiveness. Part of this monitoring would include observations of pick-up and drop-off activities at all loading zones around the school. The District would work with the City, as feasible, to implement the loading zone along Mission Avenue and would include any applicable mitigation measures as part of that analysis.

The availability of funds to cover the recommendations of Mitigation Measure TRANS-2a cannot be determined at this time, and CEQA does not require that this funding availability be addressed. The reason that the impact was identified as significant and unavoidable is because certain recommended measures require the involvement of the City of San Rafael and/or are subject to funding availability, which is unknown, and the District therefore does not have control over these measures. Without available funding, implementation of Mitigation Measure TRANS-2a would be infeasible.

B1-32 On December 5, 2016, the District met with the City's Department of Public Works to discuss the mitigation measures included in the DEIR. The City has reviewed the DEIR and has provided comments regarding individual mitigation measures (see Letter A1 above). Currently, no site has been identified for a remote drop-off location. However, the District plans to work with both the City and Marin County's Safe Routes to School program, as feasible, to identify potential locations for a remote drop-off location and identify appropriate walking paths to and from the SRHS campus. Implementation of this measure would also be subject to available funding, which is unknown. Therefore, the District is unable to commit to implementation of this measure, and this impact would be significant and unavoidable as indicated in the DEIR.

Several field visits were conducted during the development of the DEIR. As part of the existing conditions assessment, observations were made regarding existing travel speeds along key roadways that provide access to the SRHS campus (including Mission Avenue and 3rd Street). The results of these field reviews were used to inform the transportation analysis including the identification of project-generated impacts and the development of mitigation measures to address the identified impacts. Specifically, Mitigation Measure TRANS-4a was developed to address safety concerns for pedestrians and bicyclists travelling along the corridor. The measure calls for the provision of school area traffic controls aimed at increasing driver awareness of pedestrians and bicycle traffic and reducing travel speeds.

B1-33 Comment noted. Please see Response to Comment B1-4.

B1-34 While parking shortfalls resulting from the project are not considered potentially significant impacts under the CEQA significance criteria (as explained on DEIR page 4.12-36), the District acknowledges that the reduction of parking supply along Mission Avenue could inconvenience area residents. As part of the TDM program, the District plans to work with community members to identify strategies that would reduce school-related demand of parking in the neighborhood. The District would also work with the City to identify appropriate times for the loading zone parking restrictions that would allow neighborhood residents to use on-street parking during off-peak hours for school pick-up and drop-offs. The District also prepared a parking study, which is included in the DEIR as Appendix F-7. Please refer to Response to Comment A1-9.

B1-35 The current passenger loading zone would be accommodated in the proposed extended loading zone to the east. This could alleviate congestion on Mission Avenue just to the east of 3rd Street due to current unloading/loading operations so close to the intersection.

Please refer to Response to Comment B1-32. The City's Public Works Department has reviewed all recommended mitigation measures. Please see Letter A1. The District would work with the City, as feasible, to coordinate the implementation of Mitigation Measure TRANS-3c with any other proposed projects in the area (which would include changes to the fire station as appropriate).

The District cannot speak to the availability of City funds.

B1-36 On December 5, 2016, the District met with the City's Department of Public Works to discuss the mitigation measures included in the DEIR. The City has reviewed the DEIR and has provided comments regarding individual mitigation measures. See Letter A1 above.

The availability of funds to cover the recommendations of Mitigation Measure TRANS-4a cannot be determined at this time, and CEQA does not require that this funding availability be addressed. The reason that the impact was identified as significant and unavoidable is because certain recommended measures require the involvement of the City of San Rafael and funding availability, which is unknown, and the District therefore does not have control over these measures.

The sidewalk improvements along the north side of Mission Avenue were scoped to just 100 feet east of Belle Avenue at the Mission Avenue/Belle Avenue intersection primarily to fill in a gap in the pedestrian network as well as to enhance pedestrian safety. Field observations conducted for the DEIR confirmed that while there are students and campus visitors who travel to the SRHS campus via Mission Avenue east of Belle Avenue, the majority of visitors to the campus travel from the north and west side of the campus (i.e., west of Belle Avenue). Fewer than 10 percent of students walking/bicycling to or from SRHS access the campus via this segment of Mission Avenue. The project would not significantly increase the number of students accessing the SRHS campus along this segment. Please refer to Response to Comment B1-6 for the estimated cost of funding a sidewalk extension along Mission Avenue to its intersection with Jewell Street. The estimated cost of extending the sidewalk farther east for the entire length of Mission Avenue is unknown. At this time, the District cannot commit to funding this project because no source of funding for the project has been identified. This project would also require City involvement and approval.

B1-37 On December 5, 2016, the District met with the City's Department of Public Works to discuss the mitigation measures included in the DEIR. The City has reviewed the DEIR and has provided comments regarding individual mitigation measures (see Letter A1 above). While the design and

construction of the proposed pathway (if feasible) are not included in the Master Facilities Long-Range Plan, the District plans to work with the City of San Rafael so that installation of the pathway coincides with the completion of the Master Facilities Long-Range Plan. Currently, no funding sources have been identified for the construction of this pathway.

B1-38 Comment noted. Please see Responses to Comments A1-9 and A1-13.

B1-39 Please refer to Response to Comment B1-27. Contact information shall be provided on the SRCS Bond Program website (http://www.srcs.org/bond-program) for public responses to the Construction Traffic Management Plan.

LETTER B2

POINT SAN PEDRO ROAD COALITION

"Fostering Quality of Life in our Community"

January 30, 2017

Dr. Dan Zaich (dzaich@srcs.org)
San Rafael School District Planning Director

Re: San Rafael High School Capital Project DEIR

The Point San Pedro Road Coalition (Coalition)) is an organization representing the interests of over 7000 residents living in East San Rafael. On January 20, 2017, a City staff member mentioned to us that comments on the San Rafael High Capital Improvement Projects DEIR were due on January 30. This did not provide us very adequate time to respond in detail to the proposed Project.

The Coalition has been working with the San Rafael Public Works Department on addressing Road safety and congestion issues on Point San Pedro Road. As part of this effort we have worked closely with School Board Member Greg Knell and are committed to working collaboratively with other School District staff. Given our existing involvement with the school district, we were distressed that we were not directly notified of this DEIR, and that inadequate time was give due to the holidays to review the DEIR and develop a proper response. **B2-1**

In general, the Coalition's Board of Directors supports the comments submitted by the Montecito Area Residents Association (MARA) in their January 26 letter to you. Like MARA, we are committed to find solutions that would allow the San Rafael High School Improvement Project to be constructed. Given the lack of time, we cannot provide you with such a detailed response, but instead wanted to provide you with some general comments and concerns of East San Rafael residents that must be addressed.

The Coalition is concerned that the SRHS Project could result in East San Rafael residents experiencing an unnecessary increase in the existing traffic congestion while traveling through the area of SRHS, specifically on 3rd Street, to reach San Rafael's Downtown or to access the freeway on- ramps. This is especially concerning as 3rd Street is the sole ingress/egress for our residents. Congestion could be caused by additional driveways into school property, lack of well-defined pick-up and drop-off areas, or lack of parking to accommodate larger crowds at the stadium. **B2-2**

For example, should there be a separate entrance and exit from Point San Pedro Road (PSPR) into and out of the new parking lot proposed to be located at the end of the new stadium? Perhaps the lot should be accessed thru the existing big parking lot.
Are there adequate drop off and pick up locations for students? Will their location add additional traffic on PSPR? Has any consideration been given to alleviating traffic congestion near the school by banning pick up and drop off at the school such as is done at

Box 449 369B Third Street San Rafael, CA 94901
www.sprcoalition.org BoardofDirectors@sprcoalition.org

Mill Valley Middle School? Will the new events at the stadium increase traffic and congestion on City streets around the school? Can the new parking demand be handled on the campus? B2-2

The Coalition would like to be actively involved as the DEIR and the project in general progresses to find acceptable solutions to the issues identified in MARA's letter and this letter from the Coalition. Please contact our Co-Presidents and/or our Board Member and Chair of our Roadway Committee, Kevin Hagerty, so that we might be a part of this process. B2-3

Regards,

Bonita Marmor and Denise Lucy, Co-President
Point San Pedro Road Coalition

cc: Coalition Board (boardofdirectors@sprcoalition.org)
Kevin Hagerty (hagertykm@yahoo.com)
Paul Jensen (paul.jensen@cityofsanrafael.org)
MARA (contact@montecitoresidents.com)

LETTER B2
Point San Pedro Road Coalition

B2-1 This comment is a general introductory comment explaining the efforts of the Point San Pedro Road Coalition and the fact that they agree with many of the comments by the Montecito Area Residents Association (MARA) (see Letter B1). The Notice of Availability of the DEIR was mailed to neighbors within 300 feet of the project site, public agencies, and those who provided a written request for notice in accordance with CEQA, and the DEIR was made available for public review and comment for the requisite 45-day period between December 15, 2016, and January 30, 2017. Please refer to Chapter I, Section B of this FEIR for further details. Responses to specific comments are provided below.

B2-2 The District recognizes that the implementation of the Master Facilities Long-Range Plan would result in increased traffic within the vicinity of the SRHS campus (including along both directions of 3rd Street), and has proposed Mitigation Measures TRANS-1 through TRANS-7, as feasible, to address identified impacts resulting from this increased traffic. It should be noted, however, that the transportation impact analysis conservatively assumed that future travel mode shares would remain consistent with those under existing conditions. However, the implementation of Mitigation Measure TRANS-1a would reduce the number of single-student vehicle trips to and from the campus, thereby reducing the overall traffic congestion along surrounding streets, as well as the potential impacts described in Section 4.12, Transportation and Traffic, of the DEIR.

Assuming vehicle distribution patterns remain consistent with those under existing conditions (summarized in Table 4.12-9 in the DEIR), about 1 percent of project-generated vehicle trips would travel to and/or from the Point San Pedro area (and access the campus via Point San Pedro Road). This increase in vehicle trip generation would not substantially increase delays along Point San Pedro Road. The project-proposed parking lot would have access from the existing parking lot at the campus. The new driveway would only serve one-way outbound traffic that would make a right turn onto westbound 3rd Street. This driveway would primarily serve vehicles parked in the new project-proposed parking lot. Pick-up and drop-off activities along 3rd Street would continue to be conducted within the campus as well as along the existing loading zone on the north side of 3rd Street.

As part of Mitigation Measure TRANS-2b, the District would consider the implementation of a remote drop-off and pick-up program. If feasible, the program would redirect school-generated traffic to an off-site location that would allow students to walk the remainder of the way, thereby decreasing traffic congestion within the immediate vicinity of the SRHS campus. Currently, no site has been identified for remote pick-ups and drop-offs. However, the District would meet with the City within 3 to 6 months of certification of the EIR to discuss, as feasible, this and other proposed mitigation measures.

B2-3 The District has noted that Bonita Marmor, Denise Lucy, and Kevin Hagerty should be on the contact list regarding neighborhood notifications. It is assumed that the Coalition Board email address provided is the address for the two Co-Presidents.

Amy Skewes-Cox <amysc@rtasc.com>

FW: Formal EIR comment

1 message

Daniel Zaich <dzaich@srcs.org> Mon, Jan 23, 2017 at 10:23 AM
To: Amy Skewes-Cox <amysc@rtasc.com>
Cc: Mark Van Pelt <mark@vpcsonline.com>, Pete Norgaard <pete@vpcsonline.com>

-----Original Message-----
From: Bill Rothman [mailto:w1rothman@gmail.com]
Sent: Monday, January 23, 2017 10:16 AM
To: Daniel Zaich <dzaich@srcs.org>
Subject: Formal EIR comment

From William Rothman, MD

14 Cliff Road

Belvedere, Ca 94920

435-1096

Dear Mr. Zaich:

As you know, I earlier sent an email to Mr. Galli, which expressed concerns about the use of artificial turf containing Triclosan (Microban).

As you indicate in your email to me, yesterday, you passed on my comments to the EIR consultant for inclusion in the EIR process.

In writing to Mr. Galli, my main goal was to obtain the address to which to send my concerns, rather than to have the concerns I listed in the email be considered the sum and substance of those concerns which I wished to have addressed.

For that reason, now that I have been informed that you are the person to receive comments for the EIR, I am providing, below, in a more complete form, the concerns that I have. I would ask that the text, below, be accepted as my comments. Please acknowledge receipt of these comments for the EIR.

B3-1

Concerns about the use of Triclosan-containing artificial turf (These concerns are largely drawn from the research references in a report from the environmental organization Beyond Pesticides. The report can be found at the following website:http://beyondpesticides.org/assets/media/documents/pesticides/factsheets/Triclosan%20cited.pdf

1) Photosensitivity: The references report instances of allergic dermatitis resulting when skin that has triclosan on it its exposed to sunshine (reference 19). This would clearly be the situation when players come in contact with the triclosan and it gets on their skin.

B3-2

2) Possible Dioxin contamination of triclosan (references 33 and 34), leading to the dangers of cancer and endocrine disruption (reference 32). The hazards involved for students is apparent.

LETTER B3

3) Triclosan conversion to Dioxin as a result of exposure to sunlight(Reference 38), with the resulting dangers to students shown in (2), above. Because the triclosan would be a component of the turf on an open field, exposed to sunlight, this danger is apparent.

B3-2

4) Dangers of the triclosan promotion of the development of bacteria resistant not only to triclosan, but to antibiotics as well. This quite dangerous problem is discussed in references 39,40,41,42,43,44,45 and 46.

Thank you for including these comments as part of the EIR comment process.

Sincerely,

William Rothman, MD

LETTER B3
William Rothman, MD

B3-1 This comment introduces the reader to the issue of concern and the fact that the commenter's original email was not complete. Therefore, responses are provided only for the commenter's updated email, which is Letter B3.

B3-2 The commenter expresses concern that triclosan-containing artificial turf may be used for the Stadium Project, causing health problems in students who may come into contact with the turf.

Triclosan is an antibacterial agent that is commonly added to soap, cosmetics, dental products, personal care products, and durable goods, including those used in hospitals. For products such as soaps and cosmetics, the use of triclosan is regulated by the Food and Drug Administration (FDA), but use of triclosan in products such as artificial turf is regulated by the Environmental Protection Agency (EPA). It is not known if the turf that would be used for the proposed Stadium Project would incorporate triclosan.

EPA routinely evaluates risks from antibacterial agents such as triclosan. The most recent assessment in 2008 looked at measurements of urinary concentrations of triclosan within the U.S. population to determine how triclosan from consumer products was being absorbed by the body.[3] The 2008 assessment concluded that use of triclosan, with the exception of use in paints and stains, met statutory safety standards. However, since the 2008 assessment, additional data about the effects of triclosan on thyroid hormones and estrogen-related effects have become available. EPA is currently reviewing these data to determine if any additional restrictions on the use of triclosan are warranted.

The California Office of Environmental Health Hazard Assessment (OEHHA) has also evaluated the potential for health risks from artificial turf, focusing on the use of recycled crumb rubber infill. A study in 2007 focused on accidental ingestion of crumb rubber and found no significant potential toxicity.[4] However, as noted on page 4.7-11 of the DEIR, crumb rubber infill material would not be used in the new field for the Stadium Project.

An additional study, conducted in 2010, looked at potential health risks from inhalation of volatile organic compounds (VOCs) and fine particulate matter, as well as the potential for increased serious skin infections over natural turf fields, either through the harboring of bacteria or creation of additional skin abrasions.[5] Although greater skin abrasions were noted with artificial turf field, the amount of bacteria in artificial turf fields was generally lower than for natural turf fields. The study authors suggested that additional study should be performed to determine if the greater number of

[3] US Environmental Protection Agency (EPA), 2008. Reregistration Eligibility Decision for Triclosan, List B, Case No. 2340, EPA 739-RO-8009, September.

[4] Office of Environmental Health Hazard Assessment (OEHHA), 2007. Evaluation of Health Effects of Recycled Waste Tires in Playground and Track Products, January.

[5] CalRecycle, 2010. Safety Study of Artificial Turf Containing Crumb Rubber Infill Made from Recycled Tires: Measurements of Chemicals and Particulates in the Air, Bacteria in the Turf, and Skin Abrasions Caused by Contact with the Surface, October.

abrasions could cause an increased number of bacterial skin infections, even considering the fewer bacteria present on the artificial turf infill material.

Although no definitive evidence of significant health risks from artificial turf has been demonstrated in studies performed to date, OEHHA continues to study the topic. In 2015, OEHHA announced that it would conduct an additional study on the topic, which is scheduled to be completed in June 2018. The new study would attempt to develop a protocol for measuring exposures to chemicals from synthetic turf through personal monitoring of athletes and/or measuring the chemicals in blood, urine, or other bodily fluids. Measuring concentrations of contaminants that are present in the athlete's bodily fluids would be a more direct methodology for evaluating exposure risks, rather than using the concentrations of contaminants in air, soil, and turf materials collected for previous studies.

Based on available information, the project's artificial turf field would not represent a significant impact for future project site users. No mitigation is required.

Amy Skewes-Cox <amysc@rtasc.com>

EIR Comments: STADIUM PROJECT: INPUT

1 message

Daniel Zaich <dzaich@srcs.org> Fri, Jan 27, 2017 at 8:47 AM
To: Amy Skewes-Cox <amysc@rtasc.com>
Cc: "pete@vpcsonline.com" <pete@vpcsonline.com>

Dan Zaich, Ed.D. | Senior Director – Capital Facilities | **San Rafael City Schools**

Phone: 415.492.3285 |dzaich@srcs.org | www.SRCS.org

310 Nova Albion Way | San Rafael, CA 94903

From: paula machado [mailto:machadoarts@yahoo.com]
Sent: Friday, January 27, 2017 12:31 AM
To: Daniel Zaich <dzaich@srcs.org>
Subject: STADIUM PROJECT: INPUT

Dear Mr Zaich,

A big **THANK YOU** to SRHS and the greater SRCS community for the clear paths of communication as the SRHS project takes shape. Congratulations! Exciting times.

For all those that missed the meeting, several days ago Ms Garfolo kindly posted a message to the San Rafael residents on the **Next Door** app regarding updates. You may want to download the "Next Door" app and read the comments that have been in response to Ms Garfolo's post below:

"A monthly meeting to review the most recent design updates, timeline, and cost for the SRHS Stadium project. For those interested, see the notes below: **B4-1**

Project Milestones
- Schedule is moving forward, no changes. Shovel in ground in April, completed by November

Budget
- The plan budgets for the basics in everything (fence, sound system, lighting etc). To upgrade any of these items (like better sound, lighting, etc), the school will need donations. They have created a list of items that will need to be funded through fundraising, and are in the process of prioritizing it.
- If a company's sponsorship is secured for certain things (like the scoreboard) that item's budgeted money can be reallocated to something else
- Some items that did not make the budget may be fought for (like the concession stand and scoreboard). Upgraded sound system was not mentioned

Stadium Sound System:
- Only $50k budgeted for the sound system- which will buy the very basic, standard high school stadium system (vs the state of the art one that had been discussed). The sound will still be oriented towards the grandstands and will still have to meet EIR requirements, regardless. Raising $$ for a better system is currently prioritized on the draft fundraising list.

Environmental Review:
- As of 1/11 no feedback or comments have been submitted on the EIR
- Any comments/feedback submitted during by Jan 31 time MUST be addressed (but not necessarily mitigated)
- It was stated that if a question/concern is not brought up during this review process, then you "waive your right to raise it later"

B4-1

Other Notes:
- DSA: has been fully approved. Drawings for increments 2+3 have not received any major comments. expect those to be reviewed and approved by early Feb
- Turf: criteria established; if a vendor meets those criteria then they will purchase from them. no crumb rubber as infill
- Leaseback: Board of Trustees approved. NOTE: leaseback removes the ability to do a bid protest, which has the ability to delay the build."

My comments/ concerns as a "hill folk" up the end toward the end of Mission:

1. LEDS .. ugh!

Please try to minimize light pollution from more **all night LED security lighting/posts** around the buildings and stadium. What is currently in place will suffice. The new 24 hour LED lighting is oppressively bright to homes on hill. There is one at corner of the pool and that is ample to light the entire area. The soft yellow lights in corridors are not a problem. Hopefully the new small Thank you.

B4-2

2. STADIUM LIGHTS: ON? OFF?

Kindly insure that **stadium lights are on a proper timer** and carefully managed so that when games/ practices are cancelled due to weather, the lights do not stay on until 10 when no one is using the field. Cost saver!

3. PA System

You may wish to view the new upgraded PA and turf at Marin Academy and Marin Catholic as you research products/design.

B4-3

Once the new system is installed please leave clear instructions to outside groups who use the facility as to how to use the PA and NOT to exceed a prescribed decibel level as indicated on the system. Thank you.

4. LOWLAND AREA BEHIND BASEBALL OUTFIELD = swampy

Consider improved monitoring of irrigation system outside the baseball fenced area with some clean fill dirt. In summer months that area is routinely over watered and flooded until 11PM and a lake in rainy months. VECTOR has routinely had to come out because of mosquito problems. Since it is a very low lying area behind the outfield fence and often takes on as a lake in rainy months, you might consider "filling it in" if you have any "safe soil" as the stadium project begins.

B4-4

5. STREET DANGER FOR STUDENTS

SRHS Cross country running team's after school practice on Mission Street up to Embarcadero is becoming increasingly dangerous for students. More cars now drive on Mission and Embarcadero instead of their usual 3rd Street route to escape traffic. I have personally seen some scary near misses with cars swerving around runners.

B4-5

6. **SCOPE OF WORK: Timeline**

Kindly post online the timeline of stadium work schedule of project for residents. **B4-6**

7. **Drones**

Post signs :"NO Drones, bikes on baseball outfield and football field areas". Lots more recently! **B4-7**

8.

Weed Control for Fire control

Please continue to maintain invasive French broom and routinely check on eucalyptus for potential breaking limbs. Consult an arborist. Neighbors love the trees as a "break" from the stadium and 3rd street but just want them checked periodically. Thank you! **B4-8**

9.

Traffic insanity by Pre School

The Pre School at Union and Mission is a very dangerous drop off and pick up intersection. What can be done to improve this? **B4-9**

Scary!

10.

Embarcadero Ave craziness

Try to limit re-routing traffic from Mission onto Embarcadero over to 3rd. Too narrow for oncoming cars to safely back up for oncoming traffic .I have witnessed some close calls when cars "reverse" to allow another car to pass. No shoulder in parts. **B4-10**

Again, thank you for reaching out to all of us.

Sincerely,

Paula Machado

Sent from my iPhone

Brighten your day.

LETTER B4
Paula Machado (No. 1)

B4-1 These comments provide an update on the project and overview of comments that were posted on Nextdoor.com. However, the comments do not specifically require any response as related to the DEIR.

B4-2 Refer to Response to Comment B1-19. The proposal for lighting to be on timers is addressed in Mitigation Measure AESTHETICS-3 on page 4.1-15 of the DEIR. The intensity of lighting for the neighborhood is shown in the new Figure 4.1-5, which is addressed in Response to Comment B1-19 and included in Chapter III of this document.

B4-3 The commenter suggests looking at the new upgraded public address (PA) system and turf at Marin Academy and Marin Catholic High School during the design of the proposed Stadium Project. The commenter also asks that clear instructions are left to outside groups who use the PA system so that a prescribed decibel level is not exceeded.

Potential noise impacts related to the PA system are discussed under Impact NOISE-2 of the DEIR. Mitigation Measure NOISE-2 requires that a qualified acoustical engineer be used in the design and selection of the new PA system for the proposed Stadium Project. This would ensure that the appropriate technologies are used and are implemented correctly based on site-specific conditions, including a specific performance standard that the new PA system must not exceed noise levels of the existing PA system. Marin Catholic High School, referenced by the commenter, employed an acoustical engineering firm, RGD Acoustics, to evaluate noise impacts related to their new stadium lighting and new stadium PA system; RGD Acoustics' findings were presented in a report to the high school in August 2016.

The requirements for the PA design in the DEIR would mitigate potential impacts from the PA system both for District games and events and for any events that may be held by outside groups. No additional mitigation is required.

It is unclear why the commenter wants the turf at Marin Academy to be addressed. The turf provisions for the project are described on page 3-9 of the DEIR.

B4-4 The commenter states that the area behind the baseball field is currently overwatered, that monitoring of the irrigation system should be performed, and that the District should consider filling this area with excess soil that may be generated by the Stadium Project. This comment is noted for the record. However, this is a baseline condition and, as the proposed project would not affect this area and would not potentially exacerbate this issue, no text changes or additional mitigation are warranted by the comment.

B4-5 Potential impacts on pedestrian safety along roadways peripheral to the school have been identified under Impact TRANS-4 on DEIR page 4.12-40. The DEIR notes that the addition of pedestrian traffic onto existing pedestrian facilities that do not adequately accommodate the existing and future levels of pedestrian traffic would result in potential conflict between pedestrian and vehicular traffic. As part of Mitigation Measures TRANS-4a through TRANS-4c, SRCS has

agreed to work with the City of San Rafael, as feasible, to implement several pedestrian safety improvement measures that would reduce Impact TRANS-4 to a less-than-significant level. However, the impact would remain significant and unavoidable since the design and implementation of the measures would be subject to approval and implementation by the City of San Rafael rather than the District.

B4-6 The District will keep the neighborhood aware of the construction schedule for the Stadium Project once construction begins in approximately April 2017. Construction is projected to conclude around 8 months later, in approximately November 2017. The construction schedule would be posted on the SRCS Bond Program website (http://www.srcs.org/bond-program).

B4-7 The use of drones is not related to the proposed Master Facilities Long-Range Plan; thus, no specific impact related to drones has been identified in the DEIR. This issue will require separate coordination with the District by neighbors.

B4-8 It is noted that maintenance of trees and control of broom is desired by the neighbors. This is an existing condition unrelated to the proposed Master Facilities Long-Range Plan.

B4-9 The implementation of Mitigation Measure TRANS-3a, if feasible, would result in the relocation of this loading zone to accommodate an additional turn lane along westbound Mission Avenue. Visitors to the pre-school would be able to conduct drop-off and pick-up activities at the enhanced loading zone that would be provided farther east along Mission Avenue. Please see Response to Comment A1-9 for additional detail regarding the recommended loading zone improvements.

B4-10 The Master Facilities Long-Range Plan does not propose re-routing traffic from Mission Avenue onto Embarcadero Way. The trip distribution analysis estimated trip assignment based on the home origins of the existing student body at SRHS, as well as the existing and forecasted travel patterns along city streets. Based on these distribution patterns, development in accordance with the Master Facilities Long-Range Plan would add about six vehicle trips traveling eastbound on Mission Avenue and onto Embarcadero Way.

Amy Skewes-Cox <amysc@rtasc.com>

FW: SRHS upgrades. Local neighbor's support

1 message

Daniel Zaich <dzaich@srcs.org> Mon, Jan 30, 2017 at 11:00 AM
To: Amy Skewes-Cox <amysc@rtasc.com>
Cc: "Pete Norgaard (pete@vpcsonline.com)" <pete@vpcsonline.com>, Mark Van Pelt <mark@vpcsonline.com>, "Jessika K. Johnson" <jjohnson@dwkesq.com>, Mark Kelley <mkelley@dwkesq.com>

Dan Zaich, Ed.D. | Senior Director - Capital Facilities | San Rafael City Schools
Phone: 415.492.3285 |dzaich@srcs.org | www.SRCS.org
310 Nova Albion Way | San Rafael, CA 94903

-----Original Message-----
From: Tony Markwick [mailto:tonemark@gmail.com]
Sent: Monday, January 30, 2017 8:54 AM
To: Daniel Zaich <dzaich@srcs.org>
Subject: SRHS upgrades. Local neighbor's support

I live a few blocks away and fully support any improvements to SRHS, including an increase in student population. The facilities need the upgrades and it would be a neighborhood benefit in terms of the track. My mother went to SRHS in the mid 60s when the student population was 2,000 and she says there were no neighbor complaints back then. Today's neighbors got to let it go. The school was there way before they were. **B5-1**

Tony Markwick
1101 Grand Ave
94901

Sent from my iPhone

LETTER B5
Tony Markwick

B5-1 This comment expresses general support for the project and does not specifically address the DEIR.

Amy Skewes-Cox <amysc@rtasc.com>

FW: SRHS Master Plan EIR

1 message

Daniel Zaich <dzaich@srcs.org> Mon, Jan 30, 2017 at 12:00 PM
To: Amy Skewes-Cox <amysc@rtasc.com>
Cc: "Pete Norgaard (pete@vpcsonline.com)" <pete@vpcsonline.com>, Mark Van Pelt <mark@vpcsonline.com>, "Jessika K. Johnson" <jjohnson@dwkesq.com>, Mark Kelley <mkelley@dwkesq.com>

-----Original Message-----
From: William Carney [mailto:williamcarney@comcast.net]
Sent: Monday, January 30, 2017 11:58 AM
To: Daniel Zaich <dzaich@srcs.org>
Cc: Tom Adams <Tom.Adams@cityofsanrafael.org>; Danielle O'Leary <Danielle.OLeary@cityofsanrafael.org>
Subject: SRHS Master Plan EIR

Dr. Dan Zaich
San Rafael City Schools
310 Nova Albion Way
San Rafael, CA 94903

Dear Dr. Zaich,
In its April 7, 2016 letter to the San Rafael City Schools Board of Trustees, the San Rafael Citizens Advisory Committee on Economic Development and Affordable Housing (CAC) requested the Board to consider steps "to achieve an optimal design of the east end of 4th Street, including . . . a suitable entry and pedestrian access to the school to provide students with safer access to downtown, the transit center, and the Grand Avenue corridor."

B6-1

Pursuant to discussion at the January 5, 2017 CAC meeting, I would like to request that these concerns be considered during the EIR process for the San Rafael High School Master Plan, which includes building and parking alterations that could impact the ability to address the concerns.

Thank you for your consideration.

Sincerely,

William Carney, CAC Chair

LETTER B6
William Carney, Citizens Advisory Committee (CAC) Chair

B6-1 Comment noted. As part of the implementation of Mitigation Measure TRANS-5b, the District would work with the City, as feasible, to seek grant funding to conduct a study on the feasibility of implementing a new bicycle and pedestrian pathway to serve the SRHS campus. Please see Response to Comment A1-12 for additional detail regarding this mitigation measure.

Amy Skewes-Cox <amysc@rtasc.com>

FW: SRHS Master Plan EIR

1 message

Daniel Zaich <dzaich@srcs.org> Mon, Jan 30, 2017 at 12:23 PM
To: Amy Skewes-Cox <amysc@rtasc.com>
Cc: "Pete Norgaard (pete@vpcsonline.com)" <pete@vpcsonline.com>, Mark Van Pelt <mark@vpcsonline.com>, "Jessika K. Johnson" <jjohnson@dwkesq.com>, Mark Kelley <mkelley@dwkesq.com>

From: Patricia Green [mailto:pgreen_99@yahoo.com]
Sent: Monday, January 30, 2017 10:50 AM
To: Daniel Zaich <dzaich@srcs.org>
Cc: Thomas Scheidig <thomas_scheidig@yahoo.com>
Subject: SRHS Master Plan EIR

Dear Dr. Zaich,

We have reviewed the Environmental Impact Report for the SRHS Stadium and Master Facilities Plan. The findings confirm that traffic is one of the most significant impacts of the project and will be exacerbated by the future addition of 200 students. Yet, none of the mitigation efforts around traffic impacts are "assured" due to required coordination with the City of San Rafael. As impacted residents of the high school neighborhood, we feel this is unacceptable.

The current traffic and parking situation is already unacceptable and dangerous. The completion of the stadium project, which will bring additional events to the school, and the additional 200 students will only make it worse. We've previously voiced our concerns in a letter to you prior to completion of the EIR.

B7-1

We've read through the mitigation measures addressed in the report and are disappointed that most are brushed off since they require coordination with the city. On behalf of our family, we are requesting that more direct measures be taken to decrease school traffic/parking on Mission and the surrounding neighborhood streets, with the goal being significant decrease in the total percentage of school traffic using Mission Ave vs 3rd Street. The plan as draft appears to make it easier to drop-off/pick-up students on Mission which will only increase the traffic.

In summary, more needs to be done to truly implement the mitigations to the traffic and parking impacts from the project. Proposing mitigations and then saying they can't necessarily be completed is not sufficient. Thank you for your consideration of our concerns.

Best Regards,

Tricia Green and Thomas Scheidig

19 Jewell Street

San Rafael, CA

LETTER B7
Tricia Green and Thomas Scheidig

B7-1 The District recognizes that the implementation of the Master Facilities Long-Range Plan would result in increased traffic within the vicinity of the SRHS campus, and has proposed Mitigation Measures TRANS-1 through TRANS-7, as feasible, to address identified impacts resulting from this increased traffic. The District plans to develop and implement the first of these measures (Mitigation Measure TRANS-1a) within 1 year of certification of the EIR, and in advance of completion of the Master Facilities Long-Range Plan. The District also plans to meet with the City within 3 to 6 months of certification of the EIR to discuss specific elements of the mitigation measures, as feasible.

It should be noted that the DEIR transportation impact analysis conservatively assumed that future travel mode shares would remain consistent with those under existing conditions. With the implementation of Mitigation Measures TRANS-1 through TRANS-7, as feasible, vehicular traffic generation and the resultant vehicular traffic congestion along roadways peripheral to SRHS would likely be lower than those presented in the DEIR. The implementation of these mitigation measures would reduce the project's transportation-related impacts to less-than-significant levels. However, some of these measures require City involvement and approval. Implementation of certain measures would also be subject to available funding, which is unknown. Therefore, the District is unable to commit to implementation of Mitigation Measures TRANS-2a, TRANS-2b, TRANS-3a, TRANS-3b, TRANS-4a through TRANS-4c, TRANS-5b, and TRANS-5c, and therefore Impacts TRANS-2 through TRANS-5 would be significant and unavoidable as indicated in the DEIR.

Please also refer to Responses to Comments A1-9, B1-4, B1-5, and B1-7.

Amy Skewes-Cox <amysc@rtasc.com>

FW: SRHS Master Plan EIR - Resident Comments

1 message

Daniel Zaich <dzaich@srcs.org> Mon, Jan 30, 2017 at 10:24 AM
To: Amy Skewes-Cox <amysc@rtasc.com>
Cc: "pete@vpcsonline.com" <pete@vpcsonline.com>, Mark Van Pelt <mark@vpcsonline.com>, "Jessika K. Johnson" <jjohnson@dwkesq.com>, Mark Kelley <mkelley@dwkesq.com>

From: Sean Braniff [mailto:braniff@pacbell.net]
Sent: Monday, January 30, 2017 10:12 AM
To: Daniel Zaich <dzaich@srcs.org>
Subject: SRHS Master Plan EIR - Resident Comments

Dr. Dan Zaich,

I am writing re: the SRHS Master Plan EIR. I am a home owning resident at 143 Park Street. In my reading of the EIR, I was alarmed by the implications of what is being proposed. Traffic and safety are already compromised in and around the high school. The increases proposed and the inadequate measures to mitigate such increases are wholly unacceptable. Personally, I find the school traffic in the neighborhood to be the No.1 negative aspect of living and owning in this neighborhood. In fact, it is the No.1 negative aspect of calling San Rafael home.

B8-1

I wish I had some brilliant solution to propose to solve the current traffic nightmares, let alone those that would be created if the proposed expansion(s) takes place. I do not. However, it is clear that the proposed increases and inadequate mitigation measures will only exacerbate the current problems. Those of us that live in this neighborhood will be the ones to endure the brunt of the consequences.

John Braniff

143 Park Street

San Rafael, CA 94901

LETTER B8
John Braniff

B8-1 Comment noted. Please see Response to Comment B7-1.

Amy Skewes-Cox <amysc@rtasc.com>

FW: Traffic on Mission Avenue at SRHS

1 message

Daniel Zaich <dzaich@srcs.org> Mon, Jan 30, 2017 at 10:47 AM
To: Amy Skewes-Cox <amysc@rtasc.com>
Cc: "pete@vpcsonline.com" <pete@vpcsonline.com>, Mark Van Pelt <mark@vpcsonline.com>, "Jessika K. Johnson" <jjohnson@dwkesq.com>, Mark Kelley <mkelley@dwkesq.com>

From: Jim Dunn [mailto:dunnimage@aol.com]
Sent: Monday, January 30, 2017 10:06 AM
To: dzaich@srcs.org.
Subject: Traffic on Mission Avenue at SRHS

Dr. D. Zaich

Dear Sir,

I have lived on West Mission Avenue at the corner of Jewell since 1976 so I can speak with experience about the traffic. This section of W. Mission, from the intersection with Embarcadero and proceeding West, has no center dividing line, so it is up to a driver's discretion on how to share the road. Students and parents that are running late drive this section with far too much speed, using the center of the road or even the oncoming "lane" which is not marked. As I slow to enter my "uphill" driveway which is mostly "blind" to westbound traffic , I am totally exposed. One one occasion, my car was struck by a speeding motorcyclist who had no margin of safety. The absence of a center dividing line encourages driving down the middle of the road.

B9-1

Painting a center dividing line might help.

Install a traffic camera that captures the plate number of speeding cars.

A "20 MPH" speed limit sign that register actual speed is needed between Embarcadero and Jewell.

If student pick-up and drop-off could be directed to the parking lot on Third Street instead of Mission, that would also help a great deal.

Thank you for your consideration.

Sincerely,.

Jim Dunn
50 Mission Avenue
San Rafael, CA 94901
Home: 415 457 0755, Mobile: 415 314 6213
dunnimage@aol.com

LETTER B9
Jim Dunn

B9-1 Comment noted. As part of the implementation of Mitigation Measure TRANS-4a, the District would work with the City, as feasible, to provide center line pavement markings along Mission Avenue between Union Street and Belle Avenue to enhance school area safety. Additionally, the District would work with the City, as feasible, to upgrade school-related signage, and this could include the provision of additional school zone and speed limit signs.

The District is not able to install a traffic camera because traffic enforcement on City streets falls under the City of San Rafael's jurisdiction. The District will forward this comment to the City.

Please see Response to Comment B1-7 regarding directing traffic to the entrance on 3rd Street.

Amy Skewes-Cox <amysc@rtasc.com>

FW: SRHS master plan EIR

1 message

Daniel Zaich <dzaich@srcs.org> Mon, Jan 30, 2017 at 3:58 PM
To: Amy Skewes-Cox <amysc@rtasc.com>
Cc: "Pete Norgaard (pete@vpcsonline.com)" <pete@vpcsonline.com>, Mark Van Pelt <mark@vpcsonline.com>, "Jessika K. Johnson" <jjohnson@dwkesq.com>, Mark Kelley <mkelley@dwkesq.com>

From: mary gidley [mailto:marygidley@yahoo.com]
Sent: Monday, January 30, 2017 3:48 PM
To: Daniel Zaich <dzaich@srcs.org>
Subject: SRHS master plan EIR

Hi. I've lived a half a block from the high school on Belle Ave for almost 30 years, coaching the SR girls' tennis team many years ago. I am now assistant coach for both the boys and girls teams. Due to hard work and the effort of dedicated coaches, both programs are thriving.

B10-1

My questions and concerns have to do not only with the increase in traffic in the neighborhood, but also the impact on the tennis courts and players. Where will all the heavy equipment enter and exit when this stadium is under construction? Hopefully not from Belle Ave. It would be very bad for tennis, and the neighborhood.

Sincerely, Mary Gidley

p.s. I am also concerned about The Rock. There are rumors about it being removed for more parking. Not a good idea. Please address this also.

B10-2

Sent from Yahoo Mail on Android

LETTER B10
Mary Gidley

B10-1 Regarding the increase in traffic along neighborhood streets, please refer to Section 4.12, Transportation and Traffic, of the DEIR, along with Responses to Comments B1-29 through B1-34 in this document.

The construction management plan that would be included in construction contract documents (Special Conditions) would specify that all construction vehicle traffic must use 3rd Street for access to the campus. It is not anticipated that any impacts to the tennis courts would occur.

B10-2 This comment expresses concern regarding removal of "The Rock" (also referred to as "Indian Rock" or "Eagle Rock"; see Response to Comment B1-10) for parking. The District acknowledges the commenter's preference to maintain the rock. This preference would be considered when project-specific designs for parking near the location of the rock are prepared, as allowed for under the Master Facilities Long-Range Plan. The District has no immediate plans to remove the rock.

Amy Skewes-Cox <amysc@rtasc.com>

FW: SRHS Master Plan EIR

1 message

Daniel Zaich <dzaich@srcs.org> Mon, Jan 30, 2017 at 4:56 PM
To: Amy Skewes-Cox <amysc@rtasc.com>
Cc: "Pete Norgaard (pete@vpcsonline.com)" <pete@vpcsonline.com>, Mark Van Pelt <mark@vpcsonline.com>, "Jessika K. Johnson" <jjohnson@dwkesq.com>, Amy Skewes-Cox <amysc@rtasc.com>

From: Larry Mansbach [mailto:mansbach@mindspring.com]
Sent: Monday, January 30, 2017 4:32 PM
To: Daniel Zaich <dzaich@srcs.org>
Subject: SRHS Master Plan EIR

Mr. Zaich,

The EIR is silent on whether any uses on the SRHS football field that currently take place during the day will be shifted to evening/nights after the new lights are installed.

Is the answer "None"? **B11-1**

Or If one or more uses will be shifted to evenings/nights with the new lights, could one or more exhibits be added specifying which use or uses are being shifted and identifying the old and new times.

Thank you,

Larry Mansbach

mansbach@mindspring.com

LETTER B11
Larry Mansbach

B11-1 The existing stadium is already lit and thus is already used at night; this is a baseline condition. The District cannot commit to saying that no uses currently taking place in the daytime would occur at night with the upgraded stadium, largely because, with the new all-weather turf, the stadium would be available for more months of the year. Table 3-4 on page 3-17 of the DEIR lists proposed stadium usage, by sport, for each month of the year. No additional exhibits or tables are considered necessary for the DEIR.

Amy Skewes-Cox <amysc@rtasc.com>

FW: SRHS Comment's- specific to the Back Gate Entrance

1 message

Daniel Zaich <dzaich@srcs.org> Mon, Jan 30, 2017 at 2:44 PM
To: Amy Skewes-Cox <amysc@rtasc.com>
Cc: "Pete Norgaard (pete@vpcsonline.com)" <pete@vpcsonline.com>, Mark Van Pelt <mark@vpcsonline.com>, "Jessika K. Johnson" <jjohnson@dwkesq.com>, Mark Kelley <mkelley@dwkesq.com>

From: Ann Bauer [mailto:bauerannm@aol.com]
Sent: Monday, January 30, 2017 2:38 PM
To: Daniel Zaich <dzaich@srcs.org>
Cc: board@montecitoresidents.com; Glenn Dennis <gdennis@srcs.org>; Dave Pedroli <dpedroli@srcs.org>
Subject: SRHS Comment's- specific to the Back Gate Entrance

Dear Dan,

I am also ccing Glen and David as these comments are not tied to the EIS process, actions could happen regardless of the progress on the Stadium of Master Plan Projects. However please add these to comments collected as part of the EIS. Thank you.

B12-1

Since 2003 my family has lived at 114 Mission Avenue directly across from the SRHS back gate. The comments below are a compilation of observations, questions and recommendations made by my family and our neighbors.

Interim Parking Lot Near the Tennis Courts

Adding this interim parking lot has helped the weekend users of the gym and pool find parking off neighborhood streets. Yet it is not large enough for all that come events at the gym or during Swim Marin meets. Many do not know about the larger parking lot on 3rd Street. The proximity of this lot to the gym and pool makes this lot and nearby street parking their preferred areas to use. There are no signs, or maps given to them by event organizers, directing them to the 3rd Street lot.

The entrance to this back lot is narrow and only one car, in one direction can pass. Problems observed include:

B12-2

- People from out of town attending an event in the gyms come to 185 Mission and continue east on Mission looking for parking. Since there is no signage. They often drive by the entrance, then stop in the street when they realize it is parking lot. Then most are observed backing up to go in or some, that are going a bit too fast, stop quickly and come close to being rear-ended by the car behind. This happens most often when the car behind is a resident who is traveling through on Mission. Expecting the car ahead to also be driving through.

- Cars leaving the lot in mass often take the right of way. This keeps cars trying to enter the lot waiting on Mission Ave in the east bound direction. This stops through traffic and it occasionally backs up toward the blind curve at Belle and Mission. (This is observed most often on busy weekends during Swim Marin Meets and when there is a

basketball tournament, parents come and go continentally due to the nature of the events that go on all day with different ages or teams competing throughout the day.)

Recommendations:

B12-2

1. A "Right Turn Only" sign for those leaving the lot. Since most entering the lot come from the west this would help make the entrance safer and the flow better when it is busy.
2. A sign that states the hours the lot is open. We have observed cars being locked in on many occasions.
3. Add Speed bumps before the blind curve and after the curve to slow traffic and prevent collisions.

Large Buses, Construction Vehicles and Portable Classrooms Using the Back Entrance

We have watched many truck and buses struggle to enter, get stuck and on one occasion destroy the gate. Trucks occasionally require our driveway or to come up on the planted curb to enable them to make the tight turn into the lot. Or have to wait for cars to be moved if signage was not placed in advance.

Recommendations:

B12-3

1. Before the stadium project or future projects begin, can knowledgeable construction staff review this entrance and widen it to improve access?
2. Can neighbors be told in advance (e.g. 2-5 days), in addition to “No Parking” signs being placed on the street, before the arrival of portable classroom shipments or other construction deliveries that involve oversized vehicles and numerous vehicles?
3. Can a staff person be available to help guide the arriving vehicles or direct traffic?

We request that these deliveries do not occur before 8:00 am or after 7pm daily.

Please feel free to contact me directly for any reason.

Thank you.

Ann Bauer

Resident at 114 Mission Ave

415-259-8282

LETTER B12
Ann Bauer

B12-1 This first comment is a general introduction to the comments that follow. Responses to specific comments are provided below.

B12-2 Please refer to Response to Comment B1-7. As part of the TDM program to be developed under Mitigation Measure TRANS-1a, the Athletic Department would work to ensure that sports-related drop-offs and pick-ups are directed to use parking lots accessible via 3rd Street.

As depicted in Figure 3-4 in Chapter 3, Project Description, of the DEIR, the Master Facilities Long-Range Plan would include construction of a new 6,195-square-foot building (Building 7) just east of the tennis courts. To accommodate the new building, the parking lot to the east of the tennis courts would be reduced in size to include only 10 standard parking stalls. Parking in this lot would be restricted to faculty use only during school hours. The reduced size of the parking lot and the usage restrictions would reduce the volume of vehicular traffic exiting this driveway.

As part of the implementation of Mitigation Measure TRANS-4a, the District would work with the City of San Rafael, as feasible, to upgrade all school area traffic controls, and would consider providing a right-turn only sign for vehicles exiting this parking lot as well as posting the hours of operation and usage restrictions for the parking lot.

Additionally, the District would work with the City, as feasible, to upgrade school-related signage and traffic controls. This could include the provision of additional school zone and speed limit signs, and speed bumps as appropriate.

Implementation of Mitigation Measure TRANS-4a would require City involvement and approval, and would also be subject to available funding, which is unknown. Accordingly, the District is unable to ensure or commit to implementation of Mitigation Measure TRANS-4a, and this impact would be significant and unavoidable as indicated in the DEIR.

B12-3 Please refer to Responses to Comments B1-7 and B10-1. Additionally, large deliveries would not be allowed prior to 8:00 AM. Efforts would be made to schedule all deliveries at times that do not interfere with student drop-off or pick-up times. Flag men would be required for all large deliveries pursuant to the construction contract documents.

Amy Skewes-Cox <amysc@rtasc.com>

Fwd: Re: sidewalk unnecessary to end of Embarcadero and scoreboard facing other end?

1 message

Daniel Zaich <dzaich@srcs.org> Tue, Jan 31, 2017 at 9:17 PM
To: Amy Skewes-Cox <amysc@rtasc.com>
Cc: "Pete Norgaard (pete@vpcsonline.com)" <pete@vpcsonline.com>, Mark Van Pelt <mark@vpcsonline.com>, "Jessika K. Johnson" <jjohnson@dwkesq.com>, "Mark W. Kelley" <mkelley@dwkesq.com>

Get Outlook for Android

From: paula machado
Sent: Tuesday, January 31, 4:08 PM
Subject: Re: sidewalk unnecessary to end of Embarcadero and scoreboard facing other end?
To: Daniel Zaich

Thank you, Mr Zaich!

Two more ideas I wish for you to share, if not too late:

1. Sidewalk extension to Embarcadero a waste of funds

I have lived on upper Mission close to Embarcadero for more than 30 years. Over the years I have witnessed VERY FEW students who travel up hill on Mission near Embarcadero to and from school. Frankly, maybe 5 students maximum a day. Sometimes none! That is NOT the flow of traffic.The few students that I see always take the pleasant trail parallel to Mission.The SRHS cross country team can always run the trail too. It is nice to see that the trees and french broom are now being maintained far better by your crew than in past years and the trail is clear! In my observation it would be a total waste of funds to create a sidewalk to the end of Mission/ Embarcadero. Why? It is far better to spend the funds to improve the traffic mess from Belle up to Union where there are thundering herds of students chatting and on phones as they cross streets and walk in a dangerously busy zone. This is also true around the gym during basketball season! The only people who would benefit from an extended sidewalk up to Embarcadero are the "Swim Marin" folks, and it appears that we want to discourage them from parking on Mission St. Many already take the trail down to the pool. It is dreadful during weekend swim meets when parents park on upper Mission to get to the pool. Residents never have parking . A simple remedy is to advise Swim Marin and visiting teams (before season start and routinely) that all drop offs and pick ups are to be made at the ample main parking lot. After all, the walk can be part of their "warm up" exercise! Same with baseball.

B13-1

2.

Scoreboard direction: change?

Idea: Can the new score board be placed at the other end of the field so it faces Montecito? Less glare on neighborhood. A godsend!

B13-2

I know you have deadlines but here you have my two cents as a long time resident.

Best to all in your planning phase of this wonderful project!

Sincerely,

Paula Machado

LETTER B13
Paula Machado (No. 2)

B13-1 Comment noted. Please see Response to Comments B1-6 and B1-7.

B13-2 The commenter suggests that the scoreboard be moved to the opposite end of the field. The current location of the scoreboard is a baseline condition and is based upon existing power and data feeds.

Chapter III
DEIR TEXT CHANGES

This chapter identifies the text changes to the DEIR, which are made for clarification purposes or in response to comments on the DEIR.

Page 3-22, *is modified as follows to clarify the issue of pile driving:*

> **Site Grading, Pile Installation, and Construction Staging**
>
> Site development would require moderate grading to raise the site where necessary to bring new building levels above the identified Federal Emergency Management Agency (FEMA) flood plain. Grading would also occur around buildings as necessary to provide wheelchair access to all new and modernized buildings on campus. In addition, grading would occur for the new field and parking lot.
>
> Site development would not require driven piles for structural foundation support for any of the components of the Master Facilities Long-Range Plan. Alternate structural foundation support system(s), such as drilled piers, auger pressure grouted piles, or thickened mat slabs would be used in lieu of driven piles. The final design for each component would be completed by the structural engineer, based upon site data provided by the geotechnical engineer, on a building-by-building basis.

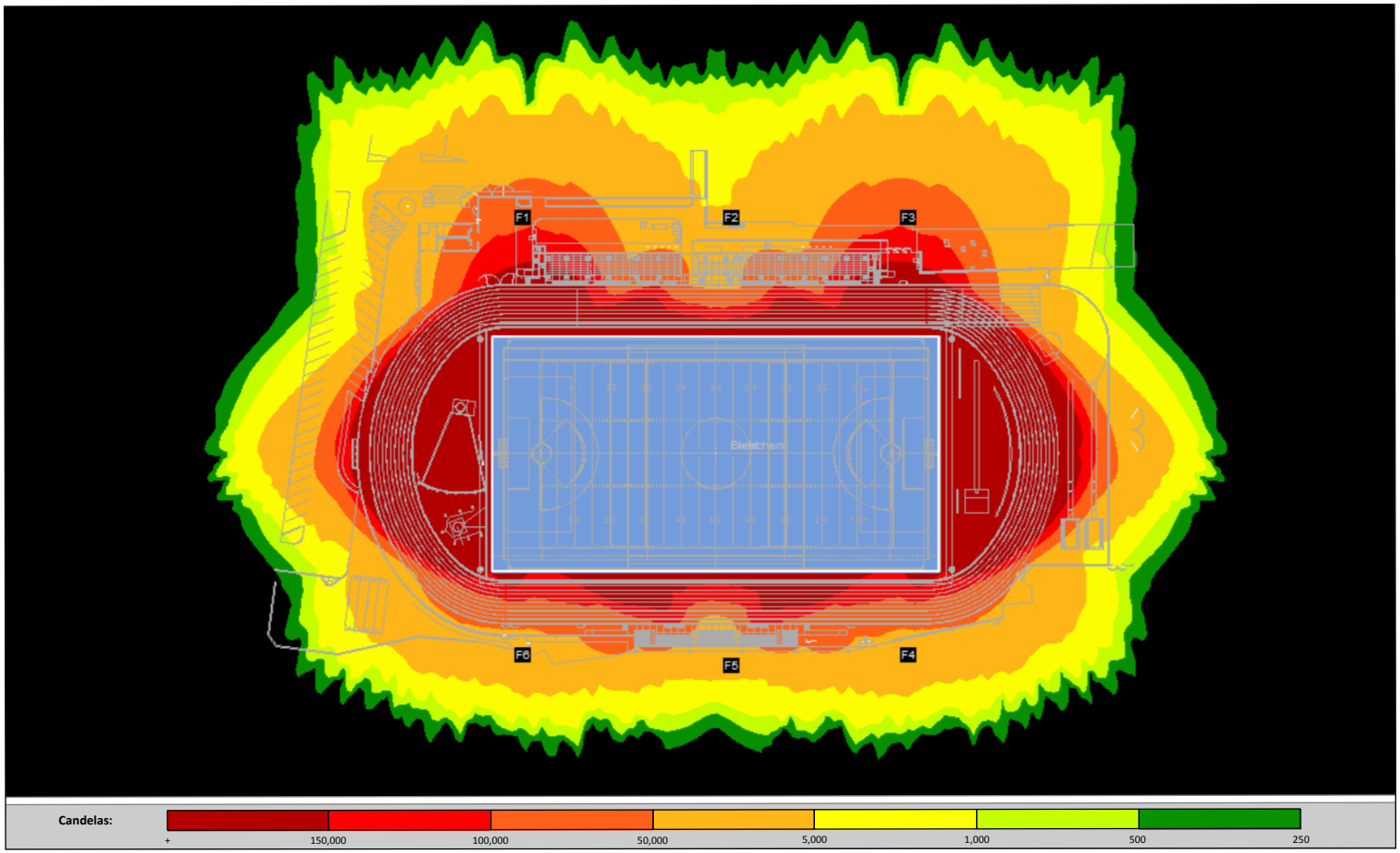
Page 3-22 is modified as follows to clarify the issue of construction vehicle access to the SRHS campus:

> Construction trailers are proposed to be located at the 3rd Street parking lot to house offices for contractors. Additional items that may be located at the 3rd Street parking lot include contractor staff parking and materials storage. Construction vehicles and trucks would be routed exclusively through 3rd Street entrances to the SRHS campus.

Figure 4.1-5, shown on the following page, is a new graphic provided to show lighting intensity at the proposed Stadium Project.

Pages 4.10-25 and 2-14, Mitigation Measure NOISE-3b, is modified as follows:

> *Mitigation Measure NOISE-3b: For each project under the Master Facilities Long-Range Plan, a Construction Noise Management Plan shall be prepared by a qualified acoustical consultant and included in all contractor specifications. The Construction Noise Management Plan shall contain a set of site-specific noise attenuation measures to further reduce construction noise impacts at the nearby on-campus buildings and off-site residential receptors. If appropriate based on the circumstances, multiple projects can be addressed under one Construction Noise Management Plan. The site-specific noise attenuation measures shall be designed to reduce noise levels at the nearest on-campus and off-site receptors to below 70 dBA L_{eq}, as practical. The nearest on-campus receptors may be located adjacent to construction and demolition locations. If it is not feasible to reduce noise at the nearest on-campus receptors to below 70 dBA L_{eq} due to their*



GLARE IMPACT

Summary

Map indicates the maximum candela an observer would see when facing the brightest light source from any direction.

A well-designed lighting system controls light to provide maximum useful on-field illuminaion with minimal destructive off-site glare.

GLARE

Candela Levels

High Glare: 150,000 or more candela
Should only occur on or very near the lit area where the light source is in direct view. Care must be taken to minimize high glare zones.

Significant Glare: 25,000 to 75,000 candela
Equivalent to high beam headlights of a car.

Minimal to No Glare: 500 or less candela
Equivalent to 100W incandescent light bulb.

Figure 4..1-5

SOURCE: Carducci Associates, 2017

GLARE INTENSITY FROM LIGHTING AT NEW STADIUM OF SRHS

proximity to the nearest construction and demolition locations, the school shall relocate students to classrooms with interior noise levels below 45 dBA L_{eq}. At a minimum, the following measures shall be included in the Construction Noise Management Plan:

- ~~*Use jetting or partial jetting of piles into place using a water injection at the tip of the pile, if feasible.*~~
- *Construct or use temporary noise barriers, as needed, to shield on-campus construction and demolition noise from noise-sensitive areas to the extent feasible. To be most effective, the barrier should be placed as close as possible to the noise source or the sensitive receptor. Examples of barriers include portable acoustically lined enclosure/housing for specific equipment (e.g., jackhammer and pneumatic-air tools, which generate the loudest noise), temporary noise barriers (e.g., solid plywood fences or portable panel systems, minimum 8 feet in height), and/or acoustical blankets, as feasible.*

Page 4.10-27, first sentence of the first paragraph, is modified as follows:

Construction activities such as ~~pile-driving or drilling,~~ caisson drilling, the use of vibratory rollers, jackhammers or other high-power or vibratory tools, and mobile construction equipment can generate vibration in the immediate vicinity of the work area.

Page 4.10-27, first sentence of the second paragraph, is modified as follows:

Table 4.10-9 indicates that vibration levels during construction could disturb receptors ~~within approximately 300 feet of construction and demolition locations proposed under the Master Facilities Long-Range Plan if a pile driver were used and~~ within approximately 75 feet of the stadium site and the construction and demolition locations proposed under the Master Facilities Long-Range Plan if non-pile driving construction equipment were used.

Page 4.10-27, last sentence of the second paragraph, is modified as follows:

Any remaining vibration impacts on both on-campus and off-site receptors would be reduced to a less-than-significant level by the implementation of Mitigation Measure NOISE-4a, which would require construction to be scheduled to avoid disrupting classroom activities; the development of Construction Noise Management Plans to reduce noise generated by construction to the maximum extent feasible (high noise-generating construction activities often generate high vibration levels) ~~and to avoid the use of impact pile driving where feasible~~; the development of a compliance tracking system; and notification of nearby residents of planned construction activities.

Page 4.10-28, Table 4.10-9, is modified as shown on the following page.

Pages 4.10-28 and 4.10-29, first paragraph in the "Vibration Damage" subsection, is modified as follows:

Development under the Master Facilities Long-Range Plan may have the potential to generate vibration that could damage off-site buildings. Table 4.10-9 indicates that buildings located within approximately ~~74 feet of an impact pile driver could be exposed to vibration levels in excess of the 0.3 in/sec threshold for damage to buildings of conventional construction. Buildings located within~~ 20 feet of ~~non-pile-driving~~ construction equipment could ~~also~~ be exposed to vibration levels in

TABLE 4.10-9 VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment		Reference PPV at 25 Feet[a] (in/sec)	Reference RMS at 25 Feet[b] (VdB)	Required Buffer Distance – On-Campus Threshold 83 VdB (Feet)	Required Buffer Distance – Off-Site Threshold 80 VdB (Feet)	Required Buffer Distance – On-Campus and Off-Site Threshold 0.3 in/sec (Feet)
~~Pile Driver (Impact)~~	~~upper range~~	~~1.518~~	~~112~~	~~232~~	~~291~~	~~74~~
	~~typical~~	~~0.644~~	~~104~~	~~125~~	~~158~~	~~42~~
~~Pile Driver (Sonic)~~	~~upper range~~	~~0.734~~	~~105~~	~~135~~	~~170~~	~~45~~
	~~typical~~	~~0.170~~	~~93~~	~~54~~	~~68~~	~~17~~
Vibratory Roller		0.210	94	58	73	20
Hoe Ram		0.089	87	34	43	11
Large Bulldozer		0.089	87	34	43	11
Caisson Drilling		0.089	87	34	43	11
Loaded Trucks		0.076	86	31	40	10
Jackhammer		0.035	79	18	23	6
Small bulldozer		0.003	58	4	5	1

Notes: Receptors within the buffer distance could be impacted by construction-generated vibration. Receptors outside of the buffer distance would not be expected to be impacted by construction-generated vibration.
[a] PPV = peak particle velocity, in/sec = inches per second,
[b] RMS = root mean square, VdB = vibration decibel
PPV2 = PPV1 x (D1/D2)^1.5
Where:
PPV1 is the reference vibration level at a specified distance.
PPV2 is the calculated vibration level.
D1 is the reference distance (in this case 25 feet).
D2 is the distance from the equipment to the receiver.
RMS2 = RMS1 – 30 Log10 (D2/D1)
Where:
RMS1 is the reference vibration level at a specified distance.
RMS2 is the calculated vibration level.
D1 is the reference distance (in this case 25 feet).
D2 is the distance from the equipment to the receiver.
Source of Equations: FTA, 2006. Chapter 12.
Source: FTA, 2006.

excess of the 0.3 in/sec threshold for damage to buildings of conventional construction~~this threshold~~. The residences along Mission Avenue and Embarcadero Way are located approximately 50 feet and 70 feet away, respectively from the nearest construction locations proposed under the Master Facilities Long-Range Plan. Based on this proximity, vibration levels would not exceed 0.3 in/sec at off-site receptors~~ unless an impact pile driver is used~~. Therefore, the potential of construction activities implemented under the Master Facilities Long-Range Plan to result in damage to off-site buildings is less than significant. ~~The implementation of Mitigation Measure~~

~~NOISE-4b below would reduce the impacts of potential building damage as a result of pile driving-generated vibration to a less-than-significant level. If pile driving is not used, no mitigation is required.~~

Pages 4.10-29 and 2-16, Mitigation Measures NOISE-4a and NOISE-4b, are revised as follows:

Mitigation Measure NOISE-4a~~4~~: Mitigation Measures NOISE-3a through NOISE-3d shall be implemented.

~~*Mitigation Measure NOISE-4b: San Rafael City Schools shall retain a structural engineer or other qualified professional to evaluate and recommend alternative methods to impact pile driving for project components that require the installation of piles. If it is not feasible to avoid impact pile driving, the structural engineer or other qualified professional shall evaluate the potential for vibration generated by the use of a pile driver during construction of a project implemented under the Master Facilities Long-Range Plan to damage off-site buildings within 100 feet of any impact pile-driving activities. The evaluation shall take into account project-specific information such as the composition of the structures, locations of the piles, and the soil characteristics in the project area, to determine whether impact pile driving may cause damage to nearby structures. If the evaluation finds that the impact pile driving may cause damage to a structure, the structural engineer or other qualified professional shall recommend design means and methods of construction to avoid the potential damage.*~~

~~*The combination of Mitigation Measures NOISE-4a and NOISE-4b would reduce this impact to a less-than-significant level. (LTS)*~~

Page 4.10-33, second paragraph, is modified as follows:

Construction activities such as ~~pile-driving or drilling,~~ caisson drilling, the use of vibratory rollers, jackhammers or other high-power or vibratory tools, and mobile construction equipment can generate vibration in the immediate vicinity of the work area.

Page 4.10-33, first sentence of third paragraph, is modified as follows:

Table 4.10-9 indicates that vibration levels during construction could disturb receptors within approximately ~~300 feet of construction and demolition locations proposed under the Master Facilities Long-Range Plan if a pile driver is used and within approximately~~ 75 feet of the stadium site if non-pile driving construction equipment is used.

Pages 4.10-33 and 4.10-34, last sentence of third paragraph, is modified as follows:

Any remaining vibration impacts on both on-campus and off-site receptors would be reduced to a less-than-significant level by the implementation of Mitigation Measure NOISE-7, which would require construction to be scheduled to avoid disrupting classroom activities; the development of Construction Noise Management Plans to reduce noise generated by construction to the maximum extent feasible (high noise-generating construction activities often generate high vibration levels) ~~and to avoid the use of impact pile driving where feasible~~; the development of a compliance tracking system; and notification of nearby residents of planned construction activities.

Page 4.10-34, first paragraph, is modified as follows:

The proposed Stadium Project would require the use of heavy construction equipment with the potential to generate vibration that could result in damage to nearby buildings. Table 4.10-9 indicates that buildings located within approximately ~~74 feet of an impact pile driver could be exposed to vibration levels in excess of the 0.3 in/sec threshold for damage to buildings of conventional construction. Buildings located within~~ 20 feet of ~~non-pile-driving~~ construction equipment could ~~also~~ be exposed to vibration levels in excess of the 0.3 in/sec threshold for damage to buildings of conventional construction. ~~this threshold.~~ The nearest residences to the proposed Stadium Project site are located along Embarcadero Way, ~~are located~~ approximately 70 feet from the restrooms proposed to be developed in the southeast corner of the stadium. ~~However, pile driving would not need to be used to construct a restroom. Therefore, construction of the restrooms would not have the potential to cause vibration damage to these buildings. Pile driving could be used in the construction of the proposed new bleachers. The proposed new bleachers would be located over 100 feet from the nearest off-site buildings, and consequently would not have the potential to generate vibration levels of over 0.3 in/sec at these buildings.~~ Therefore, the potential of the proposed Stadium Project to result in damage to off-site buildings is less than significant.

Page 4.12-1 is modified as follows:

- U.S. Highway 101 (Highway 101 or US 101) is an eight-lane freeway that runs in the north-south direction and bisects San Rafael. Several interchanges with Highway 101 provide access to the city, including the southbound on- and off-ramps at the Hetherton Street/2nd Street intersection and the Hetherton Street/Mission Avenue intersection; and, the northbound on- and off-ramps at the Irwin Street/Mission Avenue and ~~Hetherton Street/Mission Avenue intersections, and northbound on- and off-ramps at the~~ Irwin Street/2nd Street ~~and Hetherton Street/2nd Street~~ intersections respectively.

Page 4.12-1 is modified as follows:

- 3rd Street is a major arterial roadway that runs in the east west direction. East of Union Street, 3rd Street operates as a two-way street with two through travel lanes in each direction and turning lanes provided at major intersections. Approximately 300 feet ~~west~~ east of Grand Avenue (near the intersection with Mary Street), 3rd Street transitions into a one-way street running in the westbound direction. Along this segment, 3rd Street operates as a one-way couplet with 2nd Street. Near the SRHS campus, on-street parking is provided on both sides of the street between Union Street and Embarcadero Way.

Page 4.12-3 is modified as follows:

- 2nd Street is a major arterial roadway that pairs as a one-way couplet with 3rd Street. 2nd Street runs in the eastbound direction from just west of the intersection with Hayes Street ~~the Marquad Avenue/4th Street/West End Avenue intersection~~ to approximately 300 feet ~~west~~ east of Grand Avenue, where it merges with 3rd Street. Some parking is provided along the segment of 2nd Street between Irwin Street and Grand Avenue.

Page 4.12-3 is modified as follows:

- Grand Avenue is a ~~major~~ minor arterial roadway that is oriented in a north-south direction from Francisco Boulevard East in the south to its intersection Mission Avenue in the north, thereafter Grand Avenue, is a collector from Mission Avenue in the south to its intersection with Villa Avenue in the north. Grand Avenue functions as a two-way street with one travel lane in each direction. Parking is generally provided on both sides of the street.
- Hetherton Street is a one-way roadway in downtown San Rafael. Hetherton Street, under the jurisdiction of Caltrans but maintained and operated by the City of San Rafael, runs in the southbound direction from its intersection with the Mission Avenue/Highway 101 off-ramp to the north to the 2nd Street/Highway 101 northbound on-ramp intersection to the south. Hetherton Street has three southbound through travel lanes with additional turn lanes provided at major intersections. There is no parking provided along Hetherton Street.
- Irwin Street~~, also under the jurisdiction of Caltrans,~~ is a one-way roadway in downtown San Rafael oriented in the northbound direction from the 2nd Street/ Frontage Road intersection to the Mission Avenue/Highway 101 southbound on-ramp. Irwin Street has three northbound through travel lanes with additional turn lanes provided at major intersections. Parking is provided on both sides of the street but is prohibited during the evening peak commute period to accommodate heavier traffic flows.

Page 4.12-4 is modified as follows:

Peripheral to the SRHS campus (along Mission Avenue, Union Street and 3rd Street), there are marked crosswalks, including crosswalks controlled with traffic and pedestrian signals (e.g., Union Street/3rd Street), crosswalks controlled with all-way stop signs (e.g., Union Street/Mission Avenue), and uncontrolled crosswalks (across 3rd Street at Embarcadero Way, across Union Street at 4th Street, and across Mission Avenue at Park Street, ~~Alice Street, and~~ Belle Avenue, and at the SRHS Driveway [approximately 140 feet west of Alice Street])~~)~~.

Page 4.12-25, Figure 4.12-3A, is modified as shown on the following page.

Pages 4.12-41 and 2-20, third bulleted item under Mitigation Measure TRANS-4a, has been revised as follows:

- *Reconstructing non-compliant curb ramps, as appropriate, to meet Americans with Disabilities Act (ADA) standards at intersection locations peripheral to the school, i.e., San Rafael High School Driveway (East)/3rd Street, ~~Embarcadero Way/3rd Street,~~ Mission Avenue/Belle Avenue, Mission Avenue/Alice Street, ~~Mission Avenue/Park Street,~~ and Mission Avenue/Union Street.*

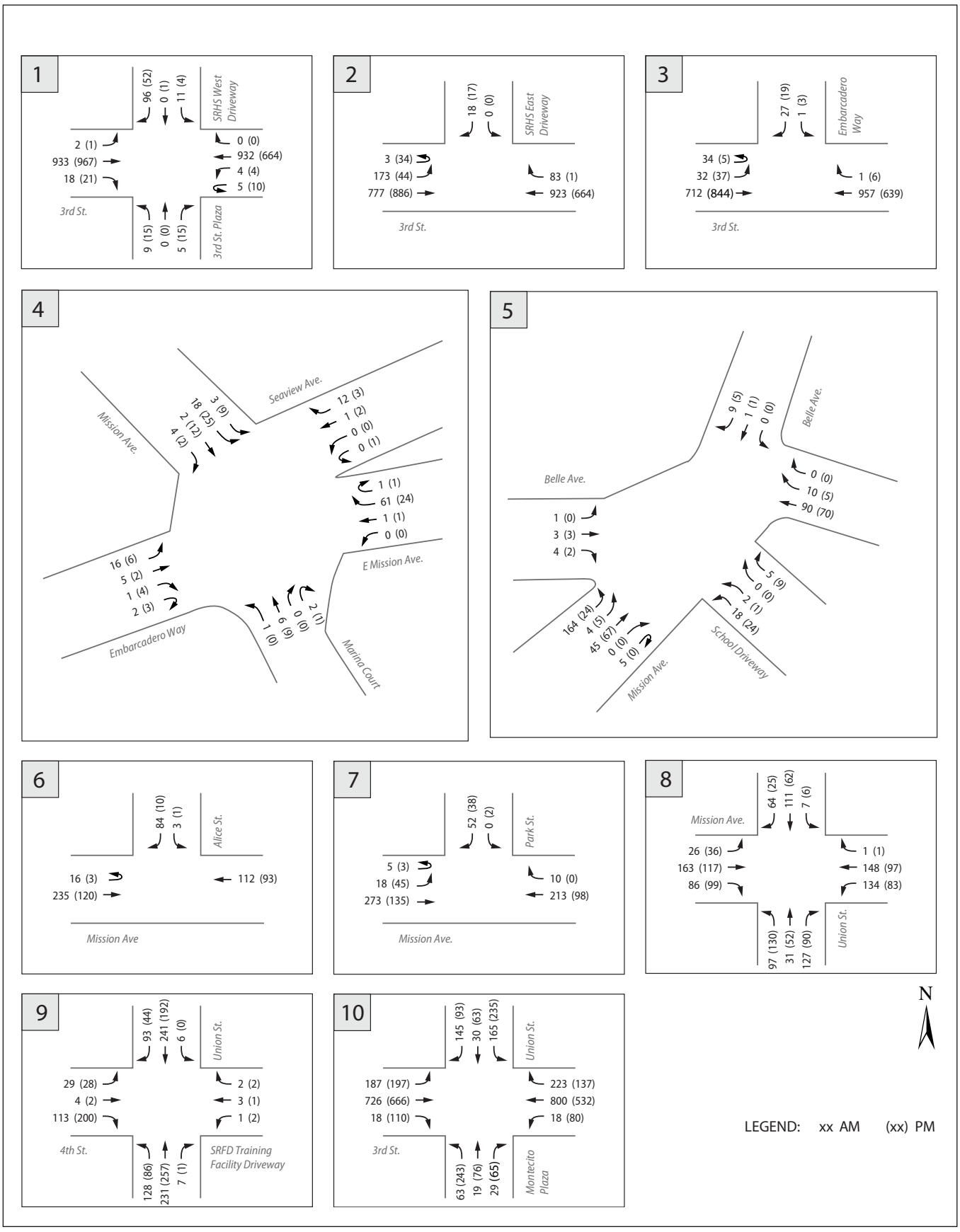


Figure 4.12-3A

SOURCE: Parisi Transportation Consulting, 2016

VEHICULAR TRAFFIC VOLUMES - EXISTING CONDITIONS

Chapter IV
MITIGATION MONITORING AND REPORTING PROGRAM

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This Mitigation Monitoring and Reporting Program (see Table IV-1) has been prepared to comply with the requirements of State law (Public Resources Code Section 21081.6). State law requires the adoption of a mitigation monitoring program when mitigation measures are required to avoid significant impacts. The monitoring program is intended to ensure compliance during implementation of the project.

This Mitigation Monitoring and Reporting Program has been formulated based upon the findings of the DEIR and the comments received on the DEIR and addressed herein. This Mitigation Monitoring and Reporting Program identifies mitigation measures recommended in the DEIR to avoid or reduce identified impacts, and specifies the agencies/parties responsible for implementation and monitoring of the measure.

The first column identifies the mitigation measure. The second column, entitled "Party Responsible for Ensuring Implementation," lists the person or agency that will undertake the mitigation measures. The third column, entitled "Party Responsible for Monitoring," lists the person or agency responsible for ensuring that the mitigation measure has been implemented and recorded. The fourth column, entitled "Monitoring Timing," identifies when and/or for how long the monitoring shall occur. If an impact was found to be less than significant and did not require mitigation, no monitoring would be required.

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
AESTHETICS						
AESTHETICS-1a: New buildings shall be designed to be both contemporary in appearance and compatible with the materiality, features, size, scale, and proportion, and massing of the existing historic building (Building A) on campus. The new work shall be differentiated from the old and shall not create a false sense of historical development.	SRCS	SRCS	At time of specific building designs			
AESTHETICS-1b: Building heights shall be less than 36 feet to be within the limits established by the City of San Rafael for the Public/Quasi-Public zoning district and to respect the scale of nearby residences.	SRCS	SRCS	At time of specific building designs			
AESTHETICS-1c: New buildings shall be designed in a color scheme that is compatible with the neutral and earth-tone colors of existing buildings, with accent colors used for specific detailing.	SRCS	SRCS	At time of specific building designs			
AESTHETICS-1d: The District shall establish Project Site Design Committees for the new buildings on the campus prior to development of schematic designs for new buildings (except for the Stadium Project, which has already undergone schematic design), and shall ensure that at least one public hearing is held for each project prior to development of construction drawings. The Project Site Design Committees shall include at least two representatives of the neighborhood.	SRCS	SRCS	Prior to development of schematic designs for new buildings			
AESTHETICS-1e: Large expanses of flat wall area along Mission Avenue shall be avoided in new buildings (especially Building 4, which has a long east/west axis), and windows and architectural detailing shall be added to provide a more aesthetically pleasing view of buildings as seen from Mission Avenue.	SRCS	SRCS	At time of specific building designs			
AESTHETICS-1f: A landscape plan shall be developed for the entire campus prior to construction of any new campus buildings in the campus core. This plan shall be reviewed by the District Board of Trustees at one public hearing that shall allow comments from the public. Suggestions from this hearing shall be considered prior to developing the final landscape plans that shall be developed prior to any construction within the campus core. The new landscape plan shall include groundcover and shrubbery at the north end of the site adjacent to Mission Avenue, where a narrow setback would exist between new buildings and the sidewalk area. New evergreen tree plantings shall occur along Mission Avenue to screen campus buildings from view, and to screen parking areas from view. Additional tree plantings with evergreen trees shall be included for the main existing parking area adjoining 3rd Street as well as for the new parking lot for 39 cars at the south end of the Stadium Project site. A minimum of five evergreen trees that are at least 24 feet at maturity shall be planted on the south side of this new parking area. All trees shall be planted from 24-inch boxes and shall be monitored for the first 3 years so that any lost trees can be replaced.	SRCS	SRCS	Prior to first new building and during construction of new buildings			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
The combination of the above measures would reduce this potential impact to a less-than-significant level.						
AESTHETICS-2: All new lighting shall be shielded to reduce off-site light and glare. Pedestrian pathway lighting shall be of a uniform style and quality of illumination that aids in navigation without over-lighting the surroundings. Signage lighting shall be minimized to provide context for pedestrians and drivers. Parking lot lighting shall be shielded and cast downward to minimize "light spillage" to off-site locations and shall be placed on timers so that minimal lighting occurs after 11:00 PM. To the extent practicable, area lighting and security lighting shall be controlled by the use of timed switches and/or motion detector activation to reduce energy consumption and excess lighting.	SRCS	SRCS	At time of placement of new lighting			
AESTHETICS-3: The District shall install outdoor lighting that is light-emitting diode (LED) but that is no greater than 3,000 Kelvin and that minimizes the "blue-rich" lighting as a means of reducing glare in the community and protecting public health. All outdoor lighting shall be shielded and directed downwards to minimize "light spillage" to off-site locations. Lighting shall be on timers so that no lighting of the Stadium Project fields occurs after 11:00 PM. Pedestrian and security lighting shall be strategically placed in the Stadium Project vicinity so that excessive lighting does not occur and shall also be shielded and directed downward. When possible, motion activated lighting shall be used to minimize overall lighting of the Stadium Project area.	SRCS	SRCS	At time of placement of new lighting			
AIR QUALITY						
AIR-1a: During project construction, the contractor shall implement a dust control program that includes the following measures: ▪ All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. ▪ All haul trucks transporting soil, sand, or other loose material off-site shall be covered. ▪ All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. ▪ All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. ▪ All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. ▪ A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Bay Area Air Quality Management District (BAAQMD) phone	SRCS	SRCS	To verify with contractor as part of contract specifications			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
number shall also be visible to ensure compliance with applicable regulations. The foregoing requirements shall be included in the appropriate contract documents with the contractor						
AIR-1b: Prior to construction of an individual project under the Master Facilities Long-Range Plan, a project-level analysis of criteria pollutant emissions during construction shall be prepared in accordance with BAAQMD CEQA Air Quality Guidance. If emissions exceed the BAAQMD's project-level thresholds of significance, then exhaust-control measures shall be identified to reduce emissions below the thresholds of significance. Acceptable exhaust-control measures for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, oxidation catalysts, diesel particulate filters, and/or other options as such become available. The contractor shall submit a Certification Statement to the San Rafael City Schools stating that the contractor agrees to comply fully with the identified exhaust-control measures (if any) and acknowledges that a significant violation of these measures shall constitute a material breach of contract. The foregoing requirement shall be included in the appropriate contract documents with the contractor.	SRCS	SRCS	Prior to construction of individual new buildings and shall be included in contract specifications			
AIR-2: Prior to construction of an individual project under the Master Facilities Long-Range Plan, a project-level health risk analysis of DPM and $PM_{2.5}$ emissions during construction shall be prepared in accordance with BAAQMD and OEHHA guidance. If the health risks and hazards from DPM and $PM_{2.5}$ emissions exceed the BAAQMD's project-level thresholds of significance, then exhaust-control measures shall be identified to reduce emissions below the thresholds of significance. Acceptable exhaust-control measures for reducing DPM and $PM_{2.5}$ emissions include the use of late model engines, diesel particulate filters, and/or other options as such become available. The contractor shall submit a Certification Statement to the San Rafael City Schools stating that the contractor agrees to comply fully with the identified exhaust-control measures (if any) and acknowledges that a significant violation of these measure shall constitute a material breach of contract. The foregoing requirement shall be included in the appropriate contract documents with the contractor.	SRCS	SRCS	Prior to construction of individual new buildings and shall be included in contract specifications			
AIR-3: During Stadium Project construction, the contractor shall use off-road equipment that meets the California Air Resources Board's Tier 2 (or higher) certification requirements. The contractor shall submit a Certification Statement to the San Rafael City Schools stating that the contractor agrees to comply fully with the Tier 2 (or higher) engine requirements described above and acknowledges that a significant violation of the measure shall constitute a material breach of contract. The foregoing requirements shall be included in the appropriate contract documents with the contractor.	SRCS	SRCS	During Stadium Project construction			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
BIOLOGICAL RESOURCES						
BIO-1: Adequate measures shall be taken to avoid inadvertent take of raptor nests and other nesting birds protected under the Migratory Bird Treaty Act when in active use. This shall be accomplished by taking the following steps: ▪ If construction is proposed during the nesting season (February through August), a focused survey for nesting raptors and other migratory birds shall be conducted by a qualified biologist within 14 days prior to the onset of vegetation removal or construction, in order to identify any active nests on the project site and in the vicinity of proposed construction. ▪ If no active nests are identified during the survey period, or if development is initiated during the non-breeding season (September through February), construction may proceed with no restrictions. ▪ If bird nests are found, an adequate setback shall be established around the nest location and construction activities restricted within this no-disturbance zone until the qualified biologist has confirmed that any young birds have fledged and are able to function outside the nest location. Required setback distances for the no-disturbance zone shall be based on input received from the California Department of Fish and Wildlife (CDFW), and may vary depending on species and sensitivity to disturbance. As necessary, the no-disturbance zone shall be fenced with temporary orange construction fencing if construction is to be initiated on the remainder of the development site. A report of findings shall be prepared by the qualified biologist and submitted to the District for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season (February through August). The report either shall confirm absence of any active nests or shall confirm that any young within a designated no-disturbance zone have fledged and construction can proceed.	SRCS	SRCS	Before and during construction			
BIO-2: Implement Mitigation Measure BIO-1.	SRCS	SRCS	Before and during construction			
CULTURAL RESOURCES						
CULT-1: Should an archaeological deposit be encountered during project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology contacted to assess the situation, determine if the deposit qualifies as a historical resource, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. If the deposit is found to be significant (i.e., eligible for listing in	SRCS	SRCS	Verify this condition included as a Condition of Approval for the project; verify contract specifications include language from			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
the California Register of Historical Resources), the District shall be responsible for funding and implementing appropriate mitigation measures. Mitigation measures may include recordation of the archaeological deposit, data recovery and analysis, and public outreach regarding the scientific and cultural importance of the discovery. Upon completion of the selected mitigations, a report documenting methods, findings, and recommendations shall be prepared and submitted to the District for review, and the final report shall be submitted to the Northwest Information Center at Sonoma State University. Significant archaeological materials shall be submitted to an appropriate curation facility and used for public interpretive displays, as appropriate and in coordination with a local Native American tribal representative. The District shall inform its contractor(s) of the sensitivity of the project area for archaeological deposits and shall verify that the following directive has been included in the appropriate contract documents: "The subsurface of the construction site may be sensitive for Native American archaeological deposits and associated human remains. If archaeological deposits are encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be redirected and a qualified archaeologist contacted to assess the situation, determine if the deposit qualifies as a historical resource, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any archaeological materials. Archaeological deposits can include shellfish remains; bones; flakes of, and tools made from, obsidian, chert, and basalt; and mortars and pestles. Contractor acknowledges and understands that excavation or removal of archaeological material is prohibited by law and constitutes a misdemeanor under California Public Resources Code, Section 5097.5."			mitigation measure			
CULT-2: Implement Mitigation Measure CULT-1.	SRCS	SRCS	Verify this condition included as a Condition of Approval for the project; verify contract specifications include language from mitigation measure			
CULT-3: Should paleontological resources be encountered during project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. For purposes of this mitigation, a "qualified paleontologist" shall be an individual with the following qualifications: 1) a graduate degree in paleontology or geology and/or a person with a	SRCS	SRCS	Verify this condition included as a Condition of Approval for the project; verify contract specifications include language from			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
demonstrated publication record in peer-reviewed paleontological journals; 2) at least two years of professional experience related to paleontology; 3) proficiency in recognizing fossils in the field and determining their significance; 4) expertise in local geology, stratigraphy, and biostratigraphy; and 5) experience collecting vertebrate fossils in the field. If the paleontological resources are found to be significant and project activities cannot avoid them, measures shall be implemented to ensure that the project does not cause a substantial adverse change in the significance of the paleontological resource. Measures may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the District for review. If paleontological materials are recovered, this report also shall be submitted to a paleontological repository such as the University of California Museum of Paleontology, along with significant paleontological materials. Public educational outreach may also be appropriate. The District shall inform its contractor(s) of the sensitivity of the project site for paleontological resources and shall verify that the following directive has been included in the appropriate contract documents: "The subsurface of the construction site may be sensitive for fossils. If fossils are encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any paleontological materials. Fossils can include plants and animals, and such trace fossil evidence of past life as tracks or plant imprints. Ancient marine sediments may contain invertebrate fossils such as snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Vertebrate land mammals may include bones of mammoth, camel, saber tooth cat, horse, and bison. Contractor acknowledges and understands that excavation or removal of paleontological material is prohibited by law and constitutes a misdemeanor under California Public Resources Code, Section 5097.5."			mitigation measure			
CULT-4: Any human remains encountered during project ground-disturbing activities shall be treated in accordance with California Health and Safety Code Section 7050.5 and Mitigation Measure CULT-1. In addition, if human remains are identified during construction and cannot be preserved in place, the District shall fund 1) the removal of human remains from the project site by a	SRCS	SRCS	Verify this condition included as a Condition of Approval for the project			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology, 2) the scientific analysis and documentation of the remains by a qualified archaeologist, and 3) the reburial of the remains, as appropriate. Excavation, analysis, and reburial of Native American human remains shall be done in consultation with the Native American Most Likely Descendent, as identified by the California Native American Heritage Commission.						
CULT-5: Proposed Buildings 1, 2, 3, and 4, which are in the immediate vicinity of the historical resource (Building A), shall require review by an architectural historian or historic architect who meets the Secretary of the Interior's Qualification Standards and is retained by the District for the purpose of verifying compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards). Typically, if a project follows the Standards, impacts on a historical resource shall be considered mitigated to a less-than-significant level. Therefore, designs for proposed Buildings 1, 2, 3, and 4 shall comply with the Standards, in order to ensure that the construction would not indirectly alter the historical resource's (Building A's) physical characteristics, such as setting, that convey its historical significance such that it is no longer eligible for listing in the California Register of Historical Resources. In compliance with the applicable Standard (Standard 9), the new work shall be differentiated from the old and shall be compatible with massing, size, scale, and architectural features of the historical resource.	SRCS	SRCS	Before and during building design			
CULT-6: The proposed modernization of the historical resource (Building A), shall require review by an architectural historian or historic architect who meets the Secretary of the Interior's Qualification Standards and is retained by the District for the purpose of verifying compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards). Typically, if a project follows the Standards, impacts on a historical resource shall be considered mitigated to a less-than-significant level. Therefore, designs for the modernization of Building A shall comply with the Standards, in order to ensure that the construction would not directly alter the historical resource's (Building A's) physical characteristics, such as setting, that convey its historical significance such that it is no longer eligible for listing in the California Register of Historical Resources.	SRCS	SRCS	Before and during building design			
CULT-7: Implement Mitigation Measure CULT-1.	SRCS	SRCS	Verify this condition included as a Condition of Approval for the project; verify contract specifications include language from mitigation measure			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
CULT-8: Implement Mitigation Measure CULT-1.	SRCS	SRCS	Verify this condition included as a Condition of Approval for the project; verify contract specifications include language from mitigation measure			
CULT-9: Implement Mitigation Measure CULT-3.	SRCS	SRCS	Verify this condition included as a Condition of Approval for the project; verify contract specifications include language from mitigation measure			
CULT-10: Implement Mitigation Measure CULT-4.	SRCS	SRCS	Verify this condition included as a Condition of Approval for the project			
GEOLOGY AND SOILS						
GEO-1: The San Rafael City Schools Board of Trustees shall demonstrate that school building design and construction comply with applicable requirements of the Field Act, including design, oversight, and inspection provisions. This shall include incorporation of public school seismic design standards established by the Division of the State Architect (DSA), review of plans by DSA, and inspections throughout construction by independent qualified inspectors. Prior to occupancy of new development under the Master Facilities Long-Range Plan, San Rafael City Schools must receive a certification of compliance from DSA that oversight and inspection of construction was completed in accordance with Field Act and other DSA requirements in accordance with DSA Procedure 13-02.	SRCS	SRCS	Before and during building design and construction			
GEO-2: For each project under the Master Facilities Long-Range Plan, the District shall ensure compliance with Mitigation Measure GEO-1.	SRCS	SRCS	Before and during building design and construction			
GEO-3: For each project under the Master Facilities Long-Range Plan, the District shall ensure compliance with Mitigation Measure GEO-1.	SRCS	SRCS	Before and during building design and construction			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
GEO-4: For the Stadium Project, the District shall ensure compliance with Mitigation Measure GEO-1.	SRCS	SRCS	Before and during building design and construction			
GEO-5: For the Stadium Project, the District shall ensure compliance with Mitigation Measure GEO-1.	SRCS	SRCS	Before and during building design and construction			
GEO-6: For the Stadium Project, the District shall ensure compliance with Mitigation Measure GEO-1.	SRCS	SRCS	Before and during building design and construction			
GREENHOUSE GAS EMISSIONS						
The project would not result in any potentially significant greenhouse gas impacts.						
HAZARDS AND HAZARDOUS MATERIALS						
HAZARDS-1: The San Rafael City Schools shall comply with provisions of the Department of Toxic Substances Control (DTSC) School Property Evaluation and Cleanup Program for development under the Master Facilities Long-Range Plan. This compliance shall include evaluation of potential hazards related to building materials in accordance with DTSC's Preliminary Endangerment Assessment Guidance Manual (Guidance Manual) and DTSC's Interim Guidance for Evaluation of School Sites With Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers (Interim Guidance). This compliance shall include an assessment of the potential for lighting fixtures and caulking in buildings constructed prior to 1977 to contain polychlorinated biphenyls (PCBs), and the abatement of any materials containing PCBs above risk-based thresholds in the Guidance Manual. This compliance shall also include soil sampling in accordance with methodology in the Interim Guidance. Any contaminants identified above concentrations in the Data Interpretation and Assessment section of the Interim Guidance shall require remedial action under DTSC oversight.	SRCS	SRCS	Before demolition and construction			
HAZARDS-2: Implement Mitigation Measure HAZARDS-1.	SRCS	SRCS	Before demolition and construction			
Hydrology and Water Quality						
The project would not result in any potentially significant hydrology or water quality impacts.						

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
Land Use and Planning						
The project would not result in any potentially significant land use impacts.						
Noise						
NOISE-1: San Rafael City Schools shall use mechanical equipment selection and acoustical shielding to ensure that noise levels from the installation/modification of heating, ventilation, and air conditioning (HVAC) systems do not exceed 45 dBA L_{eq} inside of the nearest on-campus buildings, and do not exceed 60 dBA L_{max}/50 dBA L_{eq} during the daytime and 50 dBA L_{max}/45 dBA L_{eq} during the nighttime at the nearest residential receptors. Controls that would typically be incorporated to attain this outcome include locating equipment indoors or in less noise-sensitive areas, when feasible; selecting quiet equipment; and providing sound attenuators on fans, sound attenuator packages for cooling towers and emergency generators, acoustical screen walls, and equipment enclosures.	SRCS	SRCS	During building design			
NOISE-2: San Rafael City Schools shall consult a qualified acoustical engineer in the design and selection of the new public address (PA) system for the Stadium Project. The qualified acoustical engineer shall confirm that sound is directed toward the field in a manner that reduces noise levels generated by the use of the PA system at approximately 50 feet outside the fence line of the school to below 80 dBA L_{max} to the maximum extent practicable (but in no case shall the new PA system increase noise levels relative to the existing system).	SRCS	SRCS	During Stadium Project design			
NOISE-3a: To the maximum extent practicable, San Rafael City Schools shall schedule construction activities during periods when classes are not in session, such as summer, school breaks, and after class dismissal. San Rafael City Schools shall not allow the use of heavy construction equipment during established testing periods (e.g., finals week).	SRCS	SRCS	During construction			
NOISE-3b: For each project under the Master Facilities Long-Range Plan, a Construction Noise Management Plan shall be prepared by a qualified acoustical consultant and included in all contractor specifications. The Construction Noise Management Plan shall contain a set of site-specific noise attenuation measures to further reduce construction noise impacts at the nearby on-campus buildings and off-site residential receptors. If appropriate based on the circumstances, multiple projects can be addressed under one Construction Noise Management Plan. The site-specific noise attenuation measures shall be designed to reduce noise levels at the nearest on-campus and off-site receptors to below 70 dBA L_{eq}, as practical. The nearest on-campus receptors may be located adjacent to construction and demolition locations. If it is not feasible to reduce noise at the nearest on-campus receptors to below 70 dBA L_{eq} due to their proximity to the nearest construction and demolition locations, the school	SRCS	SRCS	Before construction			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
shall relocate students to classrooms with interior noise levels below 45 dBA L_{eq}. At a minimum, the following measures shall be included in the Construction Noise Management Plan: ▪ Construct or use temporary noise barriers, as needed, to shield on-campus construction and demolition noise from noise-sensitive areas to the extent feasible. To be most effective, the barrier should be placed as close as possible to the noise source or the sensitive receptor. Examples of barriers include portable acoustically lined enclosure/housing for specific equipment (e.g., jackhammer and pneumatic-air tools, which generate the loudest noise), temporary noise barriers (e.g., solid plywood fences or portable panel systems, minimum 8 feet in height), and/or acoustical blankets, as feasible. ▪ To the extent feasible, establish construction staging areas at locations that would create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction. ▪ Ensure that construction equipment and trucks use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds) wherever feasible. ▪ Use "quiet" models of air compressors and other stationary noise sources where technology exists. ▪ Prohibit all unnecessary idling of internal combustion engines and equip all internal combustion engine-driven equipment with an operating muffler or baffling system that are in good condition and appropriate for the equipment. ▪ Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from noise-sensitive land uses. Muffle the stationary equipment, and enclose within temporary sheds or surround by insulation barriers, if feasible.						
NOISE-3c: San Rafael City Schools shall develop a set of procedures for responding to and tracking complaints received pertaining to construction noise, and shall implement the procedures during construction of projects implemented under the Master Facilities Long-Range Plan. Contractor specifications shall include these procedures. At a minimum, the procedures shall include: a) Designation of a construction complaint and enforcement manager for the project; b) Protocols specific to receiving, responding to, and tracking received complaints; and c) Maintenance of a complaint log that records received complaints and how complaints were addressed. The contact information of the construction complaint and enforcement manager shall be posted in conspicuous locations at the construction site.	SRCS	SRCS	Before and during construction			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
NOISE-3d: Residences located within 250 feet of a project implemented under the Master Facilities Long-Range Plan shall be provided with written notice of construction activity within at least 10 days before work begins, except in the case of an emergency. The notice shall state the date of planned construction activity in proximity to that residence and the range of hours during which maximum noise levels are anticipated. The notice shall also include the contact information of the construction complaint and enforcement manager identified in Mitigation Measure NOISE-3c. The combination of the above measures would reduce this impact to a less-than-significant level.	SRCS	SRCS	Before and during construction			
NOISE-4: Mitigation Measures NOISE-3a through NOISE-3d shall be implemented.	SRCS	SRCS	Before and during construction			
NOISE-5: Mitigation Measure NOISE-2 shall be implemented.	SRCS	SRCS	During Stadium Project design			
NOISE-6: Mitigation Measures NOISE-3a through NOISE-3d shall be implemented.	SRCS	SRCS	Before and during construction			
NOISE-7: Mitigation Measures NOISE-3a through NOISE-3d shall be implemented.	SRCS	SRCS	Before and during construction			
PUBLIC SERVICES						
The project would not result in any potentially significant public services impacts.						
TRANSPORTATION/TRAFFIC						
TRANS-1a: San Rafael City Schools shall develop a Transportation Demand Management (TDM) program for San Rafael High School that focuses on reducing vehicle trips and improving traffic flow by implementing a series of measures including, but not limited to, the following: ▪ Updating and enforcing elements of the school's transportation measures in the School Handbook, such as requiring on-site parking permits; instructing parents and students on expected travel routes to use, drop-off/pick-up locations, and appropriate driver behaviors; and providing bus stop and bus route information. ▪ Working with the San Rafael High School Athletic Department to ensure that sports-related drop-offs and pick-ups are directed to use the school parking lots accessible via 3rd Street. ▪ Providing wayfinding signage and informational material (e.g., flyers, emails, etc.) to visitors prior to major sports and/or special events that would direct traffic to the 3rd Street	SRCS	SRCS	Every 2 years			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
driveways. ▪ Considering promotion of carpool trips, and designating specific on-site parking spaces for carpool use only. ▪ Enrolling and actively participating in Marin County's Safe Routes to School program to take advantage of resources focused on reducing single-student occupant vehicle trips and to promote walking, bicycling, use of public transit, and carpooling. ▪ Providing personnel (trained using the American Automobile Associate School Safety Patrol curriculum) to monitor and facilitate drop-off and pick-up activities along Mission Avenue. ▪ Conducting periodic monitoring of traffic, including single-student occupant vehicles and carpools, pedestrian and bicycle trips, and school trips made by public transit to gauge success and promote appropriate measures to reduce vehicle trips.						
TRANS-1b: To the extent feasible, San Rafael City Schools shall work with the City of San Rafael to update the listed address of San Rafael High School such that the school's main access point is identified with a 3rd Street address rather than its current designated 185 Mission Avenue address. The implementation of this mitigation measure would encourage some traffic, including sports events traffic and freight traffic, away from neighborhood streets north of the SRHS campus and onto 3rd Street. Successful implementation of a TDM program that retains current traffic levels, or reduces traffic levels, with the addition of up to 200 additional students would reduce Impact TRANS-1 to a less-than-significant level.	SRCS working with City	SRCS working with City	This measure related to the address had been completed as of March 2017.			
TRANS-2a: San Rafael City Schools shall, as feasible, work with the City of San Rafael to extend westward the existing passenger loading zone by up to 300 feet, for a new passenger loading zone spanning the length of the south side of Mission Avenue between Alice Street and Park Street. The extension of the loading zone would be accomplished either by painting the adjacent roadway curb white or moving the roadway's curb and sidewalk south, if feasible. Accompanying signage would also be installed that would designate the area as a passenger loading zone. The loading zone extension would result in the loss of about 12 vehicular parking spaces. However, the zone would enhance roadway safety by increasing the designated area of drop-off, allowing vehicles to pull over for drop-off and pick-up activities and avoid hindering traffic flow along Mission Avenue.	SRCS	SRCS	As soon as possible after certification of the EIR			
TRANS-2b: The District shall consider the implementation of a remote drop-off and pick-up program. The program would designate off-site passenger loading location to divert school-related vehicle trips to locations within a one-quarter-mile radius of the site. This would reduce traffic congestion along neighborhood streets adjacent to the school site, and promote student	SRCS	SRCS	After certification of the EIR and before completion of the			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
health by allowing students to walk the distance between the off-site location and the school campus. The mitigation measure would support San Rafael General Plan Program C-4a (Street Pattern and Traffic Flow) and Program C-13a (School Transportation). The roadway curb and potential remote drop-off and pick-up locations fall under the jurisdiction of the City of San Rafael, and therefore the changes recommended in this mitigation measure would be subject to approval by the City's Public Works Department. Implementation of this measure would reduce Impact TRANS-2 to a less-than-significant level, but because the mitigation measure requires coordination with the City of San Rafael, its implementation cannot be assured. The impact is therefore considered significant and unavoidable.			projects under the Master Facilities Long-Range Plan			
TRANS-3a: As feasible, San Rafael City Schools shall work with the City of San Rafael to implement the reconfiguration of the Union Street/Mission Avenue intersection to provide two lanes in the westbound direction (a left-turn lane, and a shared through and right-turn lane) and two lanes in the northbound direction (a shared through and left-turn lane, and a right-turn lane). The additional lanes could be introduced by restriping the existing roadway to provide the additional lane markings within the existing right-of-way. The intersection reconfiguration would require use of the roadway's existing width to accommodate the additional lanes. This would be achieved by removing up to 160 feet of parking along both sides of westbound Mission Avenue, causing the loss of approximately eight parking spaces on both sides of the street, including the passenger loading zone on the south side of Mission Avenue. However, as detailed in the parking study (provided in Appendix F-7 of this EIR), the adjacent streets are operating at under 70 percent occupancy levels and could accommodate the parking demand from the displaced parking spaces. If feasible, and to the extent that California Department of Education (CDE)-mandated school site size requirements (CDE Guide to School Site Analysis and Development 2000 Report) would not be violated, an alternative roadway reconfiguration could include potentially moving the roadway curb and sidewalk southerly (onto District property) to provide the extra lane width and minimize the loss of parking along Mission Avenue. The new lane reconfiguration would potentially reduce vehicular queue lengths along the westbound direction of Mission Avenue to under 100 feet in near-term (year 2020) plus Master Facilities Long-Range Plan conditions and under 120 feet in cumulative (year 2040) plus Master Facilities Long-Range Plan conditions.	SRCS	SRCS	As soon as feasible after certification of the EIR			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
TRANS-3b: There is no feasible measure to mitigate the intersection impacts at the two San Rafael High School driveway intersections along 3rd Street. Vehicles turning left from the driveway south of the San Rafael High School driveway (west)/3rd Street intersection would experience an increase of up to about 46 seconds of delay under the Cumulative (year 2040) plus Master Facilities Long-Range Plan conditions. Under this scenario, this movement is projected to be about 11 vehicles during the morning peak hour. These vehicles would have to wait for sufficient gaps in traffic to make the left turn. While the additional delay would inconvenience these vehicles, it would only occur during the very short peak hours of school-related vehicular trip generation and would dissipate thereafter. Implementation of Mitigation Measure TRANS-3a would reduce the impact at the Union Street/Mission Avenue intersection to a less-than-significant level. However, the improvement's design and construction would be subject to approval and implementation by the City of San Rafael Public Works Department, and therefore its implementation cannot be assured. There is no feasible mitigation for impacts at the two San Rafael High School driveway impacts on 3rd Street. Impact TRANS-3 would therefore remain significant and unavoidable.	SRCS	SRCS	See TRANS-3a			
TRANS-4a: As feasible, San Rafael City Schools shall work with the City of San Rafael to implement the design and construction of the following school-area improvements: ▪ Upgrading all school area traffic controls in accordance with Chapter 7 (Controls for School Areas) of the California Manual of Uniformed Traffic Control Devices (MUTCD). For the District, upgrades would include increasing school-related signage (e.g., School Ahead, School Crosswalk, etc.) and pavement markings (e.g., Slow School Xing), and refreshing crosswalks and pavement stencils along roadways serving the campus (i.e., Mission Avenue between Mary Street and Belle Avenue, Union Street between 3rd Street and Mission Avenue, and Mary Street Between 3rd Street and Mission Avenue). ▪ Constructing about 100 feet of sidewalk along the north side of Mission Avenue just east of Belle Avenue, to fill a sidewalk gap at a well-trafficked intersection. ▪ Reconstructing non-compliant curb ramps, as appropriate, to meet Americans with Disabilities Act (ADA) standards at intersection locations peripheral to the school i.e., San Rafael High School Driveway (East)/3rd Street, Mission Avenue/Belle Avenue, Mission Avenue/Alice Street, and Mission Avenue/Union Street. ▪ Providing enhanced crosswalks (e.g., rectangular rapid flashing beacons, pedestrian hybrid beacon, and/or lighting), if considered warranted by the City of San Rafael Public Works Department, at the 3rd Street's crosswalk at Embarcadero Way and at Union Street's crosswalk at 4th Street.	SRCS	SRCS	Prior to completion of the Master Facilities Long-Range Plan			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
▪ Endorsing the City of San Rafael's efforts to improve pedestrian conditions along the south side of Mission Avenue between Belle Avenue and Embarcadero Way. Future improvements could include, but would not be limited to, providing earthwork and/or structural fill along the hillside, a continuous pedestrian walkway, and additional supply of on-street parking.						
TRANS-4b: As feasible, San Rafael City Schools shall work with the City of San Rafael to implement the design and construction of an enhanced crosswalk across 3rd Street at the San Rafael High School Driveway (West)/3rd Street intersection. As feasible and necessary, the crosswalk would include a pedestrian refuge island and rectangular rapid flashing beacons to facilitate pedestrian crossing at this intersection.	SRCS	SRCS	Prior to completion of the Master Facilities Long-Range Plan			
TRANS-4c: San Rafael City Schools shall enroll and actively participate in Marin County's Safe Routes to School program and host educational programs that inform students of pedestrian behavior that would enhance safety when walking to and from school. These mitigation measures would improve pedestrian and bicyclist facilities serving the San Rafael High School campus. The measures would enhance pedestrian and bicyclist safety within the vicinity of the campus by increasing visibility and reducing potential points of conflict with vehicular traffic. The measures would comply with the City of San Rafael's Bicycle/Pedestrian Master Plan Policy C-1 (Complete missing connections to establish direct routes for walking), Policy C-2 (Identify and mitigate impediments and obstacles to walking to school, such as through a Safe Routes to School program), and Policy C-4 (Support the installation of appropriate pedestrian facilities as part of all new transportation improvements, development projects and transit facilities). Implementation of the above measures would reduce Impact TRANS-4 to a less-than-significant level. However, since the design and implementation of the above measures shall be subject to approval and implementation by the City of San Rafael Public Works Department, their implementation cannot be assured. Impact TRANS-4 would therefore remain significant and unavoidable.	SRCS	SRCS	Prior to completion of the Master Facilities Long-Range Plan and as soon as feasible after certification of the EIR			
TRANS-5a: San Rafael City Schools shall increase the capacity of the on-campus bicycle parking facility to safely and securely accommodate up to 100 bicycles.	SRCS	SRCS				
TRANS-5b: San Rafael City Schools shall work with the City of San Rafael and Marin County's Safe Routes to Schools program in efforts to obtain a grant to conduct a study on the feasibility of implementing a new bicycle and pedestrian pathway to serve the San Rafael High School campus. The pathway could provide access to the school from either the intersection of Union Street/4th Street, along the south of Mission Avenue just east of Park	SRCS	SRCS	Prior to completion of the Master Facilities Long-Range Plan			

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
Street, along the north side of 3rd Street, or at other locations to be identified upon further study. The intent of the path would be to directly link to campus walking paths and bicycle parking. The study shall identify potential pathway alignments, impacts, and connection details, as well as circulation along 4th Street to the west and Mission Avenue to the north. The feasibility study, funded by grant funds as available, shall be conducted in coordination with the City of San Rafael Public Works Department. If feasible, the pathway shall be constructed and shall be coordinated with implementation of the Master Facilities Long-Range Plan.						
TRANS-5c: San Rafael City Schools shall enroll and actively participate in Marin County's Safe Routes to School program and (among other activities) host educational and encouragement programs that inform students of the benefits of bicycling to and from school. The implementation of these measures (except the provision of additional bicycle parking recommended in Mitigation Measure TRANS-5a) requires the involvement of the City of San Rafael and Marin County's Safe Routes to Schools program. Furthermore, it is not known if this pathway can be constructed, or if grant money would be available. Therefore, implementation of Mitigation Measures TRANS-5b and TRANS-5c is not assured, and Impact TRANS-5 would be significant and unavoidable.	SRCS	SRCS	Prior to completion of the Master Facilities Long-Range Plan and as soon as feasible after certification of the EIR			
TRANS-6: Development under the Master Facilities Long-Range Plan shall abide by the City of San Rafael's provisions regarding transportation and parking management during demolition and construction activities. In addition, San Rafael City Schools shall develop a demolition/construction traffic management plan defining hours of operation, specified truck routes, and construction parking provisions. The District shall ensure that any parking losses associated with construction vehicles does not affect parking availability on campus. To the greatest extent possible, the District shall direct all construction truck traffic to travel to and from the campus via 3rd Street. Implementation of this measure would reduce Impact TRANS-6 to a less-than-significant level.	SRCS	SRCS	Prior to start of construction			
TRANS-7: The Stadium Project shall abide by the City of San Rafael's provisions regarding transportation and parking management during demolition and construction activities. In addition, San Rafael City Schools shall develop a demolition/ construction traffic management plan defining hours of operation, specified truck routes, and construction parking provisions. Implementation of this measure would reduce Impact TRANS-7 to a less-than-significant level.	SRCS	SRCS	Prior to start of construction			
UTILITIES AND SERVICE SYSTEMS						
The project would not result in any potentially significant utilities and service systems impacts.						

Notes: SRCS: San Rafael City Schools

TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
Energy						
The project would not result in any potentially significant energy impacts.						
Recreation						
REC-1: San Rafael City Schools shall comply with all mitigation measures identified in this EIR. Compliance with these measures would ensure that the impact of recreational facilities included in the Master Facilities Long-Range Plan would be reduced to a less-than-significant level.	SRCS	SRCS	As noted in other mitigation measures			
REC-2: San Rafael City Schools shall comply with all mitigation measures for the Stadium Project that are identified in this EIR. Compliance with these measures would ensure that the impact of Stadium Project would be reduced to a less-than-significant level.	SRCS	SRCS	As noted in other mitigation measures			

Notes: SRCS: San Rafael City Schools

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APPENDIX A

CITY OF SAN RAFAEL HISTORICAL/ARCHITECTURAL SURVEY (1977/1986) 185 MISSION PROPERTY DATA FILE

CHARLES HALL PAGE & ASSOCIATES, INC.
Urban & Environmental Planning & Design/Architecture
364 Bush Street · San Francisco, California 94104 · (415) 362-5154

HISTORICAL/ARCHITECTURAL SURVEY FORM

Street Address: 185 Mission Av. (High St. facade)

Name of Structure: San Rafael High School

Occupant(s):

Present Use: High School

Original Use: High School

Additions & Alterations: Multiple additions

Ancillary Structures: School additions

Adjacent Land Uses: Parking lots

Landscaping and Grounds: Planted mall, paved

Date of Construction: 1924-25 w/ many later additions

Building Type: 2 story, reinforced concrete ?

Building Material: Masonry

Architect/Builder: Frank Shea; later additions by Aronmas & Brierley

Style: Neo-classical

Significant Architectural/Environmental Features

Paired columns, pedestal frieze, pedestal pilasters, stepped parapet

Photo Number: 11876-20

Date: 10/1/76 By: EL

Evaluation

Architectural Significance		
Exceptional	—	
Excellent	—	—
Good	—	
Fair	✓	
Poor	—	
Environmental Significance		
Exceptional	—	
Major	✓	
Contributing	—	—
Non-Contributing	—	
Desecration of Original Design		
None or Little	✓	
Moderate	—	—
Considerable	—	
Historical/Cultural Significance		
Exceptional	—	
Major	✓	—
Moderate	—	
Minor	—	

good

Physical Condition	Building	Grounds
Excellent		
Good	✓	—
Fair	—	✓
Poor	—	—

Historical Information:

Original Owner:

Significant Occupants:

Summary and Analysis:

Additional Comments:

Present Owner:

Present Zoning:

Lot Size:

Block & Lot Number:

Assessed Value - Land:
Improvements:
Total:

UTM:

SAN RA FAEL HIGH SCHOOL

Property purchased by San Rafael High School District from San Rafael Development Co. (George U. Hind, president; R. E. Shreck, secretary), Aug. 24, 1923. Subdivision map covering this property was filed Apr. 25, 1908.

Thomas P. Boyd Jr. Chairman School Board.

~~Grant.~~

San Rafael High School -
Construction started 1924
Opened 1925 - 27 classrooms
8 special rooms -
Gym, science building & fixtures added later.

San Rafael Northern
103

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

HISTORIC RESOURCES INVENTORY

(State use only)
Ser _____ Site _____ Mo. ____ Yr. ____
UTM _____ Q _____ NR ____ SHL ____
Lat _____ Lon _____ Era _____ Sig _____
Adm ____ T2 ____ T3 ____ Cat ____ HABS ____ HAER ____ Fed ____
UTM 10/542800/4202580

IDENTIFICATION

1. Common name: San Rafael High School
2. Historic name, if known: " "
3. Street or rural address 185 Mission
   City: San Rafael ZIP: 94901 County: Marin
4. Present owner, if known: San Rafael High Sch. District Address: _____
   City: _____ ZIP: _____ Ownership is: Public [x] Private [ ]
5. Present Use: High School Original Use: High School
   Other past uses: _____

DESCRIPTION

6. Briefly describe the present physical appearance of the site or structure and describe any major alterations from its original condition:

Two story, reinforced convrete building in the Neo-classical Style. Ionic columns, paneled frieze, paneled pilasters, stepped parapet. There have been multiple additions for the school use. Landscaping includes planted wall, paving and parking lots.

7. Locational sketch map (draw and label site and surrounding streets, roads, and prominent landmarks):

NORTH ↑

8. Approximate property size:
   Lot size (in feet) Frontage _____';
   Depth _____';
   or approx. acreage _____.

9. Condition: (check one)
   a. Excellent [ ] b. Good [x] c. Fair [ ]
   d. Deteriorated [ ] e. No longer in existence [ ]

10. Is the feature a. Altered? [x] b. Unaltered? [ ]

11. Surroundings: (Check more than one if necessary)
   a. Open land [ ] b. Scattered buildings [ ]
   c. Densely built-up [ ] d. Residential [x]
   e. Commercial [ ] f. Industrial [ ]
   g. Other [x] Parking lots.

12. Threats to site:
   a. None known [x] b. Private development [ ]
   c. Zoning [ ] d. Public Works project [ ]
   e. Vandalism [ ] f. Other [ ] _____

13. Date(s) of enclosed photograph(s): 1978

NOTE: The following (Items 14-19) are for structures only.

14. Primary exterior building material: a. Stone ☐ b. Brick ☐ c. Stucco ☐ d. Adobe ☐ e. Wood ☐
f. Other ☒ Masonry

15. Is the structure: a. On its original site? ☒ b. Moved? ☐ c. Unknown? ☐

16. Year of initial construction 1924-25 This date is: a. Factual ☒ b. Estimated ☐

17. Architect (if known): Frank Shea. Additions by Gromme & Priestley

18. Builder (if known): _____

19. Related features: a. Barn ☐ b. Carriage house ☐ c. Outhouse ☐ d. Shed(s) ☐ e. Formal garden(s) ☐
f. Windmill ☐ g. Watertower/tankhouse ☐ h. Other ☒ Multiple for school use. i. None ☐

SIGNIFICANCE

20. Briefly state historical and/or architectural importance (include dates, events, and persons associated with the site when known):

Property purchased by San Rafael High School District from San Rafael Development Co. (George U. Hind, president; R.E. Shreck, secretary), Aug. 24, 1923. Subdivision map covering this property was filed Apr. 25, 1908. The property, a 29-acre site known as the Eagle Rock site, was purchased in 1923 at $700 to $900 per acre. Bounded by Mary, Third and Laguna streets and Mission Avenue. Twenty-five acres purchased from a Mrs. Mason, additional four acres from another owner, possibly Douglass. Local residents called it "Happy Valley Lake" because the lower part was under water. Ground borken for building Dec. 17, 1923, school opened in 1925. There have been numerous additions and remodelings since, but fromt portion of main building is essentially as constructed in 1924-25. Later additions were by architects Gromme & Priestly.

21. Main theme of the historic resource: (Check only one): a. Architecture ☒ b. Arts & Leisure ☐
c. Economic/Industrial ☐ d. Exploration/Settlement ☐ e. Government ☐ f. Military ☐
g. Religion ☐ h. Social/Education ☐

22. Sources: List books, documents, surveys, personal interviews, and their dates:

Flack: History of Marin County
San Rafael High School Board of Education Minutes Nov. 11, 1924.
Water connection

23. Date form prepared: 1/9/78 By (name): Niki Simons
Address: 23 Scenic City San Rafael ZIP: 94901
Phone: 454-2168 Organization: City of San Rafael

(State Use Only)

S.R.H.S. Information

(validated by Carol Gamper from
meritapes of Board of Ed. Minutes Nov. 11, 1924

Architect - Frank Shea

Board of Ed. = Pres. Thos. P. Boyd, Sr.
Dr. R.D. Duffley, Sr.
Pratt C. Inman
Elmer N. Newhall
Geo. M. Dodge
Oliver P. Hartzell, Supt. and Clerk of Board

Signed

~~Urgent Breaking - Dec. 17, 1923~~ notes from S.R.H.S. Files

School Dedicated -

School Opened - Monday, Aug. 17, 1925

"Eagle Rock Site" - bounded by Marx, Sherbad
Laguna Sts. and Mission Avenue.
29 acres purchased @ $700 an acre. Known
as Happy Valley. (Grounds were dubbed Happy
valley Lake because water covered much of the lowlands)

Cornerstone of School - {Aug. 1924 / Dec. 13, 1924} 2 conflicting dates

$400,000 from bond issue of $500,000 used in equipping
new high school.

Building consisted of main large building of
27 classrooms (with 23 teachers and principal's) & gymnasium used as an all
purpose room for performances, assemblies, physical
education activities and dances. Woodwork and
Mechanical Shops held in a separate temporary
building near present site of boys' new building
1929 - Bond election held and carried for
remodeling of old gym and assembly hall into
a new, modern auditorium

1930 Buildings dedicated
1930 Auditorium and Gym dedicated
1938 Bond election held and carried for

1939 1. New Study Hall
Wing to house a new art department, Bookkeping department of three classrooms and Visual Education room with a classroom adjoining.

1939 2. Complete new building to house music department and another wing for domestic science department.

1949 Swimming Pool

1958 Cafeteria and Science Wings

Jean Pitcher
3/3/77

SAN RAFAEL HISTORICAL BUILDING SURVEY
WORK SHEET

DATE	BY	
10.27.76	SHH	185 MISSION STREET ADDRESS — NEIGHBORHOOD
		High School - main (orig) bldg NAME OF BUILDING (IF ANY) — PRESENT USE
		PARCEL NUMBER — ZONING
		OWNER OF RECORD, ADDRESS (IF DIFFERENT)
		1924 — 1924 - PORTION EST. DATE OF CONSTRUCTION — CONFIRMED (STATE SOURCE)
		1925 WATER CONNECTION DATE
		ORIGINAL OWNER
		HISTORICALLY SIGNIFICANT OWNERS OR OCCUPANTS SEE ALSO CHAIN OF TITLE ON SEPARATE SHEET
		ARCHITECT AND/OR BUILDER Architect - Frank Shea
		ORIGINAL USE Educational
		INTERIM USES
		TAX CODE AREA — ASSESSED VALUATION — LAND — IMPROVEMENTS — TOTAL
		HISTORICAL SIGNIFICANCE (STATE SOURCES)

SAN RAFAEL HIGH SCHOOL

Property, a 29-acre site known as the Eagle Rock site, was purchased by San Rafael Board of Education in 1923 at $700 to $900 per acre. Bounded by Mary, Third and Laguna streets and Mission Avenue. Twenty-five acres purchased from a Mrs. Mason, additional four acres from another owner, possibly Douglass . Local residents called it "Happy Valley Lake" because the lower part was under water. Ground broken for building Dec. 17, 1923, school opened 1925. There have been numerous additions and remodelings since, but front portion of main building is essentially as constructed in 192 4-25. Later additions were by architects Stromme & Priestley

185 MISSION SAN RAFAEL HIGH SCHOOL

FLACK 454 03- -21 THE SAN RAFEAL PARENT-TEACHER ASSOCIATION PASSED A RESOLUTION ENDORSING THE SITE AT HIGHLAND FOR THE PROPOSED SAN RAFAEL UNION HIGH SCHOOL.

SHH

FLACK 456 09- -21 THE BOARD OF EDUCATION PASSED A RESOLUTION FAVORING A SITE AT HIGHLANDS FOR THE PROPOSED NEW SAN RAFAEL HIGH SCHOOL.

FLACK 465 03- -23 THE $500,000 HIGH SCHOOL AND ELEMENTARY SCHOOL BOND ISSUE WAS CARRIED. AN ELECTION WAS ALSO HELD AS TO PREFERENCE OF VOTERS FOR THE SITE. NORTH HIGHLANDS WON, OTHER SITES: B ST, EAGLE ROCK, DOUGLASS GROUNDS, SOUTH HIGHLANDS, MARY ST. AND WILSON TRACT.

FLACK 467 07- -23 THE S.R. BOARD OF EDUCATION DECIDED ON THE EAGLE ROCK SITE FOR THE NEW SCHOOL HOUSE. THE PROPERTY COMPRISES 29 ACRES AND THE PRICE WAS $700 PER ACRE. THE TERRITORY PURCHASED IS BOUNDED BY MARY, THIRD, LAGUNA, AND MISSION.

SAN RAFAEL HISTORICAL BUILDING SURVEY
WORK SHEET

DATE	BY	
		185 Mission Ave STREET ADDRESS — NEIGHBORHOOD
		San Rafael High School — SR Hi School NAME OF BUILDING (IF ANY) — PRESENT USE
		14-101-09 — Uncl. PARCEL NUMBER — ZONING
		SRHS District OWNER OF RECORD, ADDRESS (IF DIFFERENT)
		EST. DATE OF CONSTRUCTION — CONFIRMED (STATE SOURCE)
		#6640 — Jan. 1924 - SRHSD WATER CONNECTION DATE
		SRHSD - cornerstone laid Dec. 1924 ORIGINAL OWNER
		HISTORICALLY SIGNIFICANT OWNERS OR OCCUPANTS SEE ALSO CHAIN OF TITLE ON SEPARATE SHEET
		ARCHITECT AND/OR BUILDER
		ORIGINAL USE
		INTERIM USES
		Non-Taxable TAX CODE AREA — ASSESSED VALUATION LAND — IMPROVEMENTS — TOTAL
		HISTORICAL SIGNIFICANCE (STATE SOURCES)