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**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 19<sup>th</sup> and very early 20<sup>th</sup> 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.

**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.**

**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.

**Traffic and TRANSPORTATION:** The EIR traffic findings confirm the existence 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:

- 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.

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.

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!).

**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.

**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.

**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 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.

**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.

**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.

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.

### **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**

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?
  - 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?
  - b. AESTHETICS-1f: Will native drought resistant plants be used?
  - c. AESTHETICS-1f: Will neighbors be invited to participate in the landscape planning meetings, in addition to the one public hearing?
  - d. AESTHETICS-1f: Can you clarify what area of Mission will receive the new evergreen tree plantings?
  - 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.
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?
  - 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?

- 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?

### **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?
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?

### **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.

### **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?

### **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?

- c. Does this measure and take into consideration the bowl shape around the stadium and the sound traveling up hillside?
- 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?
- 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 3<sup>rd</sup> 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?
- 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?

## **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?

- 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.
  - 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.
2. **TRANS-2 (Addition of project generated traffic on Mission, will deteriorate traffic flow, presenting a safety hazard)**
- 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?
  - 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?

- 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?
- 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?
  - 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)?
  - c. TRANS-3c: What are the implications of removing the passenger loading zone on the south side 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?
- 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.

- 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?
- 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?
- 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?
- 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?

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  
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