



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 respectfully 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

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

2. Section 4.4- Cultural Resources.

DEIR Section 4.4 addresses both archaeological and historic resources. Regarding archaeological resources, the DEIR acknowledges 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 of 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.

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 as 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).

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 device 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.

**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.

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 5<sup>th</sup> Avenue and San Rafael Commons at 4<sup>th</sup>/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.

- 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.

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.

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.

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.

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

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 signaling 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.

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.

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.

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.

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.

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.

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.

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.

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](mailto:paul.jensen@cityofsanrafael.org) or Bill Guerin, Public Works Director at 415-485-3110 or [bill.guerin@cityofsanrafael.org](mailto: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.

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.

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.

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.

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.

## Page 4.12.25 (Figure 4-12-3A)

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

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.

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.

## 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.

## 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:

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