



April 6, 2009

William Savidge  
District Engineering Officer  
West Contra Costa Unified School District  
Facilities Planning and Construction  
1300 Potrero Avenue  
Richmond, CA 94804

Dear Mr. Savidge:

We appreciated the opportunity to meet with you recently, as well as your invitation to comment on the School District's plans for their environmental review to temporarily relocate 600 students from Portola Middle School to El Cerrito High School, resulting in a total enrollment of 1800 students. We understand the need to vacate the seismically hazardous Portola Middle School main building, and appreciate the School District's efforts to evaluate and mitigate the environmental impacts that might be caused by the relocation. Based on the 50% increase in enrollment that will result from this relocation to the High School site, the potential for significant negative environmental impacts, and strong community concern is a distinct possibility. As you know, either of those factors can trigger the need for an Environmental Impact Report (EIR). Therefore, we believe that an EIR should be seriously considered to analyze and mitigate any potentially significant unavoidable environmental impacts for this project.

We believe that transportation/traffic, air quality, public services, noise, utility service systems, and aesthetic impacts may raise the project to a level of an EIR. We also believe that the benefit of preparing an EIR is that alternatives to the project could be examined, specifically using the lower playfield at Portola Middle School as the temporary relocation facility while Castro School is being remodeled. As mentioned in our meeting, if you do a Mitigated Negative Declaration (MND), and then the need for an EIR arises, that could add time and cost, compared to doing an EIR upfront.

We believe that the increase in students could overburden the infrastructure for both El Cerrito High School and surrounding residential neighborhoods. While the portables on the site previously housed the high school students during construction of the new permanent high school building, the attendance was limited to 1200. This site has never accommodated as many as 1800 students, and environmental review has never been done to contemplate that number of students. This 50% increase in attendance has the potential to cause significant unavoidable negative impacts on the surrounding community, for the issue areas outlined above. Due to the large increase in students and intensity of use, there is also the potential for significant neighborhood controversy. Therefore, a new EIR should be done to assess the potential impacts, and mitigate them to levels of insignificance.

Based on our joint meeting on Tuesday, March 24, 2009, and staff's understanding of the proposed project, we offer the following comments for your consideration:

**Transportation/Traffic:**

1. The City raised a number of issues on the Draft and Final EIRs (DEIR and FEIR) for the Castro/Portola School in our letters of October 27, 2008, and December 10, 2008. Our concerns for this project include many of those same issues. Therefore, please reference those letters as the scope of the new EIR is prepared to ensure that all of the prior concerns that were raised in our previous letters, that remain relevant for the new project, are addressed in the new EIR. A number of those still relevant prior comments are summarized below. Please include these items, among the other still relevant ones raised in our letters, in your new EIR:
  - a) The descriptions of project locations, current uses, and characteristics should describe the drop-off and pick-up areas and operations at the existing Portola Middle School, for the existing High School use, and for the combined High School and the Middle School use to be relocated to the High School site. This will lay the groundwork for an adequate analysis of the impacts of the proposed project. It is important to note that the existing Portola Middle School has two on-site drop-off and pick-up areas: one on Navellier Street and one on Moeser Lane. To at least meet the existing site design of the Portola Middle School, and to diminish congestion and emergency vehicle access concerns on the local residential streets surrounding the temporary Portola Middle School site, the relocated school should provide an off-street, on-site drop-off and pick-up queuing area to minimize the negative impacts of cars and buses on the local residential streets surrounding the High School. This is further supported by the project objective in the DEIR of developing “a project that respects community patterns of use and mitigates potential impacts.”
  - b) The new EIR needs to quantify the expected parking demand generated by the combined schools, and describe how that demand will be accommodated.
  - c) The proposed Collaborative for High Performing Schools (CHPS) standard to “meet maximum parking capacity guidelines and provide preferred parking for carpools and vanpools to limit automobile use” should be demonstrated in the Traffic and Circulation section of the new EIR.
  - d) To fully evaluate previously expressed concerns, each of the City of El Cerrito General Plan Policies should be individually evaluated. Important elements to be addressed include the following:
    - How will the project impact the public transit system that serves the schools?
    - How will the project impact bicycle routes and access to the schools?
    - How will the project impact safe pedestrian access to the schools?
    - How will the project impact maintaining adequate emergency vehicle access?
    - How will the project design impact walking, bicycling and transit use?
    - How will the project impact the role of streets not only as vehicle routes, but also as part of an extensive system of public spaces where people live and city residents meet?
    - How will the project impact the existing system of arterial and collector streets and if necessary employ traffic management techniques to control the speed of vehicles traveling on residential streets?

- e) Because the project generates more than 100 trips, it should evaluate the Traffic Service Objectives (TSOs) for Routes of Regional Significance, including San Pablo Avenue, Carlson Boulevard, Central Avenue, and Cutting Boulevard. The West Contra Costa Technical Advisory Committee (WCCTAC) and Contra Costa County Transportation Authority (CCTA) should be consulted.
- f) As indicated in the El Cerrito Circulation Plan for Bicyclists and Pedestrians for schools: "Students, parents, staff, teachers, and administrators all arrive and depart the school grounds within a brief period of time. As a result, there are often conflicts between motorists, bicyclists, and pedestrians. This is especially a concern because young children and youth are present. A more detailed investigation of transportation issues for each school is required. However, there are some improvements that should be prioritized, such as providing a complete and well-connected sidewalk or path for major routes leading to the school, updating the signage and striping to alert motorists of the presence of school children, and enforcing traffic patterns in pick up and drop off areas." As such, the new EIR should evaluate and identify any needed improvements to existing sidewalks, crosswalks, and bicycle facilities in this area based on the design guidelines in the Circulation Plan. The new EIR should include development of a school route plan as indicated in the California Manual on Uniform Traffic Control Devices.
- g) The school route plan needs to be developed in a systematic manner by the school and the City's Police and Public Works Departments. The plan must show streets, the school, existing traffic controls, established school walk routes, and established school crossings. Furthermore, the type(s) of school area traffic control devices used should be related to the volume and speed of vehicular traffic, street width, and the number of the students using the crossing. More specifically, the need to enhance and/or relocate existing crosswalks must be evaluated in light of the additional traffic and buses, changes to loading and bus zones, and changes to the school entrances. This evaluation goes hand-in-hand with DEIR Mitigation Measure 4.11.2.4e that calls for the provision of crossing guards at appropriate neighborhood intersections. The project also needs to include development of a comprehensive Safe Routes to School Program using federal guidelines. It should be noted that West Contra Costa Technical Advisory Committee and Contra Costa County recently received a Federal Safe Routes to School Program grant to conduct walkability audits/walkability workshops, on-site technical assistance, and classroom pedestrian educational presentations for several elementary and middle schools in the West Contra Costa Unified School District including Portola Middle School. This grant project should serve as a launching point for a comprehensive Safe Routes to School Program completed as part of this project.
- h) To fully address concerns regarding congestion, transit access and emergency vehicle access, the new EIR should analyze the following items for the local residential streets in the area:
- existing street curb-to-curb widths, parking and travel lanes widths;
  - existing and proposed sidewalks surrounding the school;
  - existing and proposed length (considering new curb cuts) of loading zones (white and green curb), extended bus zones, and disabled on-street parking;

- existing and anticipated drop-off and pick-up operations including queuing, bus dwell times, and double parking;
  - exhibit illustrating proposed bus turnout;
  - required lane widths and turning radii for roads carrying AC Transit buses;
  - required clearances for emergency vehicle access and response routes;
  - increases in daily traffic volumes in relation to the existing average daily traffic volumes.
2. The impacts of the temporary increased High School site population would easily spill to Stockton where the Fairmont School increase will also take place. These cumulative impacts must be evaluated.
  3. During the Upper Fairmount Streetscape planning process, the City became aware of some existing traffic problems in the area (Rockway, Colusa, Sea View), and any additional trips on those streets may result in significant impacts that could require mitigation.
  4. A Request for Proposal has been sent out for design services on the Fairmount-Ashbury intersection. This is one of several on-going or planned projects that may have to be included in the new EIR cumulative analysis. Other projects may include the Central-I-80 Interchange, I-80 Corridor Management Program that will include major intersections along San Pablo Avenue, and the approved Creekside residential project.
  5. The EIR should evaluate access, circulation and safety of pedestrians, bicyclists, vehicles, transit and emergency vehicles on all the arterial, collector and local roadways within the area bounded by Moeser Lane on the north, San Pablo Avenue on the west, city limits on the south and Seaview Drive on the east. The City of Albany should also be contacted. This is an area of high transit, pedestrian, and bicycle activity due to the presence of the El Cerrito Plaza, BART Station, Fairmount Elementary School, Senior Center, Library, El Cerrito High School, Harding Elementary School, St. Jerome School, and Upper Fairmount Avenue businesses, as well as Albany Middle and High Schools. Traffic calming and pedestrian safety devices, including speed humps, traffic circles, in-street pedestrian signs and raised crosswalks, have been installed on various streets in the area to address residents' concerns about traffic. The recent Upper Fairmount Streetscape Master Plan has brought to the City's attention concerns about traffic volumes and speeds on other residential streets in the area.

This area includes the following key roadways that should be included in the traffic analysis:

**North-South**

- San Pablo Avenue
- Ohlone Greenway (Multi-Use Trail)
- Richmond Street
- Behrens Street
- Albemarle Street
- Clayton Avenue
- Ashbury Avenue

- Pomona Avenue
- Avis Drive/Terrace Drive/Colusa Avenue
- Seaview Drive

**East-West**

- Moeser Lane
  - Waldo Avenue
  - Stockton Avenue/Terrace Drive
  - Eureka Avenue
  - Lincoln Avenue
  - Central Avenue
  - Rockway Avenue
  - Fairmount Avenue
  - Lynn Avenue
6. The new EIR should evaluate and identify any mitigation measures consistent with the California Manual on Uniform Traffic Control Devices. This includes any needed improvements to existing sidewalks, crosswalks, and bicycle facilities in this area. More specifically, the need to enhance, relocate, and/or enhance existing crosswalks and revise traffic control devices must be evaluated in light of the additional traffic and buses, changes to loading and bus zones, and changes to the school entrances that will occur as a result of the relocation project.
7. The traffic analysis should include intersection operations during the AM Peak, School Afternoon Peak, and PM Peak periods at the following intersections, at a minimum:
- San Pablo Avenue/Stockton Avenue (signal)
  - Richmond Street/Stockton Avenue (signal)
  - Ashbury Avenue/Stockton Avenue (two-way stop)
  - Avis Drive/Terrace Drive/Stockton Avenue (two-way stop)
  - Richmond Street/Eureka Avenue (two-way stop)
  - Ashbury Avenue/Eureka Avenue-West (one-way stop)
  - Ashbury Avenue/Eureka Avenue-East (all-way stop)
  - Colusa Avenue/Eureka Avenue-West (one-way stop)
  - San Pablo Avenue/Lincoln Avenue (two-way stop)
  - Richmond Street/Lincoln Avenue (two-way stop)
  - Ashbury Avenue/Lincoln Avenue (one-way stop)
  - San Pablo Avenue/Central Avenue (signal)
  - Richmond Street/Central Avenue (all-way stop)
  - Ashbury Avenue/Central Avenue (one-way stop)
  - San Pablo Avenue/Fairmount Avenue (signal)
  - Liberty Street/Fairmount Avenue (signal)
  - Richmond Street/Fairmount Avenue (all-way stop)
  - Ashbury Avenue/Fairmount Avenue (signal)
  - Ashbury Avenue/Rockway Avenue (one-way stop)
  - Colusa Avenue/Rockway Avenue (one-way stop)
  - Colusa Avenue/Seaview Drive (one-way stop)
  - Colusa Avenue/Fairmount Avenue (signal)

8. Intersection counts should include vehicles, buses, pedestrians and bicyclists. Peak period intersection and 48-hour roadway counts should be provided to the City. The level of service methodology for signalized intersections should be based on the Highway Capacity Manual.
9. The project trip generation should account for worst-case in terms of the highest number of both high school and middle school students in comparison to the existing enrollment at the high school.
10. The new EIR should evaluate existing on-street parking occupancy and supply in the area around the school as indicated above. Any changes to the demand and supply of on-street parking should also be identified and evaluated. This should include proposed revisions to on-street parking restrictions. The parking evaluation should account for removal/changes in on-street parking restrictions and supply due to the new curb cuts, loading zones and bus zones.
11. The impacts of additional traffic and parking on emergency vehicle access, in consideration of existing street widths, should be evaluated.
12. The provision of adequate Americans with Disabilities Act access to the temporary campus is a concern.
13. The closure of the existing Portola Middle School Campus will require that all unnecessary school signs and markings be removed.
14. Planned capital improvement projects in the area to be considered in the new EIR include:
  - Upper Fairmount Streetscape – Landscaping and Street Furniture (Spring/Summer 2009)
  - San Pablo Avenue Streetscape Improvements (Construction Summer 2009)
  - Citywide Street Resurfacing Program (Construction Summer 2009 and Summer 2010)
  - Fairmount Avenue/Ashbury Avenue Intersection Safety Improvements (Construction in Winter 2009/10)
  - BART Seismic Retrofit of Stations and Aerial Guideway (Construction 2009-2013)
    - i. Portions of Ohlone Greenway will be closed, and pedestrians and bicycle detours implemented during this time.
    - ii. Eastbound Fairmount Avenue will be closed and detoured to eastbound Central Avenue between Liberty Street and Richmond Street for a period of three months in 2010.
15. The traffic consultants also need to analyze the potential traffic impacts of the project on Harding School.
16. Weekend traffic counts should also be taken into account for special events held at the school.

17. Extensive traffic counts are needed – particularly with added buses, impacts on Fairmount and Ashbury and Central and Richmond. How will the additional student population affect traffic circulation at the BART station? Looking at alternatives in an EIR would clearly show which site has a lesser effect traffic-wise on the surrounding neighborhood.
18. The FEIR contains numerous Mitigation Measures (MMs) that will also be relevant to the new EIR. Therefore, those MMs should be included in the new EIR. As an example of a MM that should be included in the new EIR, MM 4.11.2.4.a provides for the WCCUSD to provide the resources for a dedicated School Resource Officer (SRO) for the new Portola School campus. The District shall fund this SRO. If one SRO is deemed insufficient by the City and the District, then a second SRO shall be considered necessary. Also please see comments B-1 through B-62 in our December 10, 2008 letter that still appear relevant to the new project and therefore should be addressed in the new EIR.

#### **Public Services/Safety/Parks and Recreation**

19. The EIR should analyze the effects on emergency response. Increased traffic congestion from the increase in the student population could have a significant impact on emergency response. If any traffic modifications are implemented, care must be exercised for emergency response in the impacted area. In addition, existing intersections with traffic signals or any newly proposed traffic signals should be required to have Emergency Vehicle Traffic Preemption Devices known as “Opticom” installed to reduce the impacts on emergency response.
20. Alternatives for public safety access to the site should be examined. The access to a temporary school on the lower Portola School playfield would be substantially easier due to the distribution of traffic across the City instead of concentrating it at one location.
21. The Police Chief expressed concerns at our meeting that the age difference between Middle School and High School students could present security challenges for the school administration. The proposed project would result in the different age student populations being mixed in a compact area. We are aware that the Hercules Middle School/High School are blended. However, that is on a 75 acre campus, compared to the much smaller 15 acre El Cerrito High School campus, that was not built with a mixed population in mind. Therefore, the new EIR should analyze the District’s program to avoid such potential problems.
22. There appears to be the potential for inadequate capacity with both schools on the same campus. What is the percentage of Adams Middle School population being transferred/reassigned to Portola this coming school year? Kennedy School may also become a concern. Kennedy is not planned to close for at least two years due to the subsidy from the City of Richmond. However, the temporary Portola campus has no timeline that we are aware of, and could last longer than two years. If Richmond does not continue their subsidy, and the District does not find additional funding, it is conceivable that Kennedy could close in two years, and some of that population could be redistricted to El Cerrito High School. That could result in a population on the El Cerrito High School site of over 2000 students two years from now.

23. Currently the City of El Cerrito provides afterschool services to approximately 130 middle school students. To continue to provide a quality afterschool program, the City would need designated afterschool program rooms to facilitate enrichment activities for this age group. The City would also need access to the gymnasium for afterschool programming and league basketball play.
24. Both the City and the High School provide afterschool programs to both high school and middle school students. City staff is concerned that altercations may occur on the way home between both age groups at the conclusion of the school day and afterschool program day. Please analyze this potential and provide mitigation, if necessary in the new EIR.
25. There is the potential for standing traffic in the student drop off areas completely choking arterials in the area. That will significantly reduce emergency response capabilities and time into that area and surrounding neighborhoods. To reduce this concern, the El Cerrito Fire Department would require adequate traffic circulation plans with designated student drop off zones that are off the roadway and increased road width for queuing vehicles before they are able to get into the designated student drop off areas.
26. The original installation of the portable classrooms required Emergency Vehicle Access (EVA) into and around the high school campus to accommodate emergency operations. The fire code specifically requires certain EVA standards. Those standards must be reevaluated and all required EVA standards must be brought back into compliance with the original conditions of approval and any changes that may have been implemented in the 2007 Fire Code must be implemented. The Fire Department will require the submittal of plans to prove that all required EVA's meet the original conditions of approval, and any revised code changes are reflected and met.
27. Fire hydrant location and spacing may need to be upgraded. The resubmittal of plans will be required to show that required fire flow and fire hydrant spacing meets the original conditions of approval, and meets any code changes that may have been enacted in the 2007 Fire Code.
28. The temporary portable classrooms already on the high school site have automatic and manual fire alarm systems installed. All life safety systems installed in the portable classrooms must be brought back up to code and must pass a new acceptance test before students are allowed to occupy any portable classrooms.

### **Noise**

29. The new EIR should include a noise contour map showing existing noise and proposed noise levels beyond the high school property line. Such a map would help determine potential impacts to surrounding neighbors. The data must include existing noise levels, increases in the noise level due to the addition of students, and identify how the noise will comply with the noise standards in the City General Plan.
30. The noise impacts generated by the proposed enlarged student population utilizing outdoor school areas should be analyzed, and mitigated if necessary in the new EIR. In addition, any impacts caused by a change in activities in outdoor school spaces should

also be analyzed (e.g. increased use of outdoor areas for middle school physical education.)

### **Aesthetics/Visual Resources**

31. No environmental review appears to have been done for initial placement of the portables for the El Cerrito High School students. Nothing appears on the California Environmental Quality Act net Database at the State Clearinghouse. The visual impact of the temporary campus should be examined in the new EIR.

### **Other Concerns**

32. Stege Sanitary District capacity in this location needs to be analyzed for the additional 600 students.
33. The temporary impacts of construction on existing recreational facilities that are to remain on the project site should be fully evaluated in terms of noise, access and safety.
34. The FEIR requires preparation of a maintenance plan for upkeep of the existing Portola campus after its vacation. Rather than deferral of the plan, it should be presented in the new EIR to ensure that it is comprehensive and coordinated with other services.

This project will predominately impact the single family neighborhoods surrounding the High School. Given our comments that are outlined above, we would strongly encourage that the need for a new EIR be considered.

Thank you again for meeting with the City staff to hear our concerns, and for inviting us to submit our suggestions for environmental review to you in writing. If you have any questions regarding our comments, please feel free to contact me at 510/215-4308.

Sincerely,

Mitch Oshinsky, AICP  
Community Development Director

cc: Scott Hanin, City Manager  
Scott Davidson, PMC Consultants