CITY OF SUNNYVALE

STRATFORD SCHOOL AT PARTRIDGE AVENUE

ENVIRONMENTAL IMPACT REPORT

SCH #2015042054

Prepared for:

CITY OF SUNNYVALE
456 W. OLIVE STREET
SUNNYVALE, CA 94086

Prepared by:

PMC®

JANUARY 2016

CITY OF SUNNYVALE

STRATFORD SCHOOL AT PARTRIDGE AVENUE

FINAL ENVIRONMENTAL IMPACT REPORT

SCH #2015042054

Prepared for:

CITY OF SUNNYVALE
456 W. OLIVE STREET
SUNNYVALE, CA 94086

Prepared by:

PMC
500 12TH STREET, SUITE 250
OAKLAND, CA 94607

JANUARY 2016

1.0 INTRODUCTION

1.1 Purpose of the EIR 1-1
1.2 Response to Comments and FEIR Revisions 1-1
1.3 EIR Certification Process and Project Approval 1-1

2.0 RESPONSE TO COMMENTS

2.1 Introduction 2-1
2.2 Commenter List 2-1
2.3 Comments and Responses 2-3
2.4 Master Responses 2-3
Master Response 1 2-3
Master Response 2 2-6
Master Response 3 2-8
Master Response 4 2-9
2.5 Responses to Comment Letters 2-10
CAL: California Department of Transportation, November 10, 2015
Response 2-14
CSC: County of Santa Clara, November 9, 2015
Response 2-17
SCUSD: Santa Clara Unified School District, November 9, 2015
Response 2-23
VTA: Valley Transportation Authority, November 4, 2015
Response 2-26
PC: Planning Commission, November 9, 2015
Response 2-29
A: Andrew and Gilda Fracchia, September 27, 2015
Response 2-31
B: Susan Werlich, October 1, 2015
Response 2-33
C: Aida Rita Sued-Dominguez, October14, 2015
Response 2-35
D: Alice Hansen, October 27, 2015
Response 2-37
E: William and Barbara Patton, November 3, 2015
Response 2-39
F: Wee-Lee Lim, November 3, 2015
Response 2-42
G Lik Roper, November 4, 2015
Response 2-47
H Katie Hadfield, November 4, 2015
Response 2-50
I: Adiba Mudarris, November 5, 2015
Response 2-52
J: Deepak Kollipara, November 6, 2015
Response 2-54
K: Tappan Merrick, November 7, 2015
Response 2-59

L: Nabeel Ibrahim November 7, 2015
Response 2-68
M: Preeti Sharma, November 7, 2015
Response 2-71
M 2: Preeti Sharma, November 9, 2015
Response 2-73
M 3: Preeti Sharma, November 9, 2015
Response 2-75
M 4: Preeti Sharma, November 11, 2015
Response 2-79
M 5: Preeti Sharma, November 11, 2015
Response 2-81
N: Tina Franceschi, November 7, 2015
Response 2-83
O: Elaine Manley, November 8, 2015
Response 2-85
P: Denise DeLange, November 9, 2015
Response 2-88
P1: Denise DeLange, November 9, 2015
Response 2-92
Q: Joan Clothier, November 9, 2015
Response 2-96
R: Deborah Marks, November 9, 2015
Response 2-98
S: Harry Whitesell, November 9, 2015
Response 2-101
T: Henry Alexander, November 10, 2015
Response 2-104
U: Eleanor Hansen, November 10, 2015
Response 2-107
V: Shannon Milne, November 10, 2015
Response 2-109
W: Mary Walz, November 10, 2015
Response 2-111
X: Nitin Bahadur, November 10, 2015
Response 2-114
Y: Carol Colao, November 10, 2015
Response 2-116
Z: Lyja Levas, November 10, 2015
Response 2-119
A1: Shomir Dighe, November 10, 2015
Response 2-123
A 2: Debbie Wetmore, November 11, 2015
Response 2-125
A 3: Karen Shemwell, November 11, 2015
Response 2-127
A 4: Kristin Brennan, November 11, 2015
Response 2-129
A 5: Mark Beyer, November 11, 2015
Response 2-131
A 6: Dena Donahue, November 11, 2015
Response 2-133

A 7: Raghu Prasad, November 11, 2015
Response 2-137
A 8: Lisa Schreiber, November 11, 2015
Response 2-139
A 9: Sirma Tzoutzova, November 11, 2015
Response 2-141
A10: Mary Rinki, November 11, 2015
Response 2-143
A11: Yunhong Li, November 11, 2015
Response 2-145
A12: Vivian Lam, November 11, 2015
Response 2-147
A13: Martin Landzaat, November 11, 2015
Response 2-149
A14: Anindya and Preeti Ray, November 11, 2015
Response 2-153
A15: Lillian Kwiatkowski, November 11, 2015
Response 2-155
A16: James Longmire, November 11, 2015
Response 2-157
A17: Mary Sullivan, November 11, 2015
Response 2-159
A18: Cynthia Kurtz, November 11, 2015
Response 2-161
A19: Heather Chen, November 11, 2015
Response 2-163
A 20: Sesha Narahari, November 11, 2015
Response 2-166
A 21: Bruce Tichinin, INC., November 11, 2015
Response 2-170
A 22: Denise DeLange and Henry Alexander, November 9, 2015
Response 2-172

3.0 AMENDMENTS TO THE DRAFT EIR

3.1 Amendments to the Draft EIR 3-1

APPENDICES

Appendix A: Mitigation and Monitoring Reporting Plan

This page is intentionally left blank.

1.0 Introduction

1.0 INTRODUCTION

1.1 PURPOSE OF THE EIR PROCESS

This Final Environmental Impact Report (FEIR) is an informational document prepared by the City of Sunnyvale (City) to evaluate the potential environmental impacts of the proposed Stratford School at Partridge Avenue Project (project). The primary objectives of the EIR process under the California Environmental Quality Act (CEQA) are to inform decision-makers and the public about a project's potential significant environmental effects, identify possible ways to minimize significant effects, and consider reasonable alternatives to the project. This EIR has been prepared with assistance from the City's environmental consultants, Michael Baker International and Fehr & Peers Transportation Consultants, and reviewed by City staff for completeness and adequacy in accordance with Public Resources Code (PRC) Sections 21000–21177 and the CEQA Guidelines.

As prescribed by CEQA Guidelines Sections 15088 and 15132, the lead agency, the City of Sunnyvale, is required to evaluate comments on environmental issues received from persons who have reviewed the Draft EIR (DEIR) and prepare written responses to those comments. This document, together with the DEIR (incorporated by reference in accordance with CEQA Guidelines Section 15150), will comprise the FEIR for this project. Pursuant to CEQA requirements, the City must certify the FEIR as complete and adequate prior to approval of the project.

This FEIR contains individual responses to each written and verbal comment received during the public review period for the DEIR, as well as master responses that address recurring comments submitted by more than one person. In accordance with CEQA Guidelines Section 15088(b), the written responses describe the disposition of significant environmental issues raised. The City and its consultants have provided a good faith effort to respond in detail to all significant environmental issues raised by the comments.

1.2 RESPONSE TO COMMENTS AND FEIR REVISIONS

A Notice of Availability was posted on the City's website and distributed to interested parties on April 20, 2015. A public scoping meeting was held on May 6, 2015. The DEIR was available for public review and comment between September 28 and November 11, 2015. The Planning Commission held a hearing to receive comments on the DEIR on November 9, 2015. Comments received during the public review period and during the Planning Commission hearing are addressed in this FEIR.

1.3 EIR CERTIFICATION PROCESS AND PROJECT APPROVAL

In accordance with the requirements of CEQA and the procedures of the City, the Planning Commission must certify the EIR as complete and adequate prior to taking action on the proposed Stratford School at Partridge Avenue project.

Once the EIR is certified and all information considered, using its independent judgment, the City can take action on the conditional use permit, map finalization, and the issuance of building, fire, and other required permits. While the information in the EIR does not control the City's decision, the City must respond to each significant effect and mitigation measure identified in the EIR by making findings supporting its decision.

This page is intentionally left blank.

2.0 Response to Comments

2.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Code Regulations Section 15000 et seq.). The City is the lead agency for the environmental review of the proposed project and has the principal responsibility for approving the project. This FEIR assesses the expected environmental impacts resulting from the approval and implementation of the proposed project and responds to comments received on the Draft EIR (referred to as Draft EIR or DEIR).

2.2 COMMENTER LIST

The following commenters submitted written comments on the Draft EIR. The comment period for the Draft EIR began September 28, 2015, and ended November 11, 2015. Confirmation of lead agency compliance with CEQA for public review of the Draft EIR was received by the Governor's Office of Planning and Research on September 28, 2015.

Letter	Commenter	Date
Agency		
CAL	California Department of Transportation	Nov. 10, 2015
CSC	County of Santa Clara	Nov. 9, 2015
SCUSD	Santa Clara Unified School District	Nov. 9, 2015
VTA	Valley Transportation Authority	Nov. 4, 2015
PC	Planning Commission Meeting	Nov. 9, 2015
Individual		
A	Andrew and Gilda Fracchia	Sept. 27, 2015
B	Susan Werlich	Oct. 1, 2015
C	Aida Rita Sued-Dominguez	Oct. 14, 2015
D	Alice Hansen	Oct. 27, 2015
E	William and Barbara Patton	Nov. 3, 2015
F	Wee-Lee Lim	Nov. 3, 2015
G	Lik Roper	Nov. 4, 2015
H	Katie Hadfield	Nov. 4, 2015
I	Adiba Mudarris	Nov. 5, 2015
J	Deepak Kollipara	Nov. 6, 2015
K	Tappan Merrick	Nov. 7, 2015
L	Nabeel Ibrahim	Nov. 7 2015
M	Preeti Sharma	Nov. 7, 2015
M2	Preeti Sharma	Nov. 9, 2015

Letter	Commenter	Date
M3	Preeti Sharma	Nov. 9, 2015
M4	Preeti Sharma	Nov. 11, 2015
M5	Preeti Sharma	Nov. 11, 2015
N	Tina Franceschi	Nov. 7, 2015
O	Elaine Manley	Nov. 8, 2015
P	Denise DeLange	Nov. 9, 2015
P2	Denise DeLange	Nov. 9, 2015
Q	Joan Clothier	Nov. 9, 2015
R	Deborah Marks	Nov. 9, 2015
S	Harry Whitesell	Nov. 9, 2015
T	Henry Alexander	Nov. 10, 2015
U	Eleanor Hansen	Nov. 10, 2015
V	Shannon Milne	Nov. 10, 2015
W	Mary Walz	Nov. 10, 2015
X	Nitin Bahadur	Nov. 10, 2015
Y	Carol Colao	Nov. 10, 2015
Z	Lyja Levas	Nov. 10, 2015
A1	Shomir Dighe	Nov. 10, 2015
A2	Debbie Wetmore	Nov. 11, 2015
A3	Karen Shemwell	Nov. 11, 2015
A4	Kristin Brennan	Nov. 11, 2015
A5	Mark Beyer	Nov. 11, 2015
A6	Dena Donahue	Nov. 11, 2015
A7	Raghu Prasad	Nov. 11, 2015
A8	Lisa Schreiber	Nov. 11, 2015
A9	Sirma Tzoutzova	Nov. 11, 2015
A10	Mary Rinki	Nov. 11, 2015
A11	Yunhong Li	Nov. 11, 2015
A12	Vivian Lam	Nov. 11, 2015
A13	Martin Landzaat	Nov. 11, 2015
A14	Anindya and Preeti Ray	Nov. 11, 2015
A15	Lillian Kwiatkowski	Nov. 11, 2015
A16	James Longmire	Nov. 11, 2015
A17	Mary Sullivan	Nov. 11, 2015

Letter	Commenter	Date
A18	Cynthia Kurtz	Nov. 11, 2015
A19	Heather Chen	Nov. 11, 2015
A20	Sesha Narahari	Nov. 11, 2015
A21	Bruce Tichinin, INC.	Nov. 11, 2015
Planning Commission Meeting		
A22	Denise DeLange and Henry Alexander	Nov. 9, 2015

2.3 COMMENTS AND RESPONSES

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issue raised and must be detailed, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, there must be a good faith and reasoned analysis in the written response. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section15204).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the project's significant effects might be avoided or mitigated. This section also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion.

CEQA Guidelines Section 15088 recommends that where a response to comments results in revisions to the Draft EIR, that those revisions be incorporated as a revision to the Draft EIR or as a separate section of the FEIR. Revisions to the Draft EIR are incorporated as Section 3.0 of this FEIR.

2.4 MASTER RESPONSES

Below are responses to comments received on the proposed project during the DEIR public review process. Four master responses have been prepared to respond to similar comments. Specific comment letters received have been addressed below in Subsection 2.5, Responses to Comment Letters.

MASTER RESPONSE 1: CUMULATIVE TRAFFIC IMPACTS

Commenters inquired about transportation impacts associated with nearby projects under construction or in the planning phase that were analyzed in the Draft EIR for transportation impacts. Several commenters note that projects such as the Apple Campus 2, Gateway Village,

Vallco Mall, and others will exacerbate traffic congestion in the project area, and request that the Draft EIR be revised to include consideration of these developments.

This Master Response addresses how development projects such as the Apple Campus 2, Gateway Village, and Vallco Mall were included in the Background and Cumulative analysis scenarios in the Draft EIR.

Background Conditions Scenario

The Draft EIR evaluates vehicle trips from nearby "approved but not yet built" and "not occupied" development projects in the cities of Sunnyvale, Cupertino, and Santa Clara under the Background Conditions scenario. Staff from these cities provided a list of approved but not yet built and not occupied development projects. Projects larger than 20 residential units or 10,000 square feet of office/commercial space were considered. Trip generation estimates from approved and not occupied projects that would add traffic to the study intersections were obtained from their respective traffic impact assessments (TIAs) or estimated based on trip generation rates published in the Institute of Transportation Engineers *Trip generation* (9th Edition). The trips for each of the projects were then assigned to the roadway network based on population and employment data, existing and estimated future travel patterns, and recent TIAs completed in the area.

In total, 60 projects were included in the Background Conditions scenario. Notable projects evaluated include:

- Apple Campus 2 (Cupertino)
- Homestead Square Shopping Center (Cupertino)
- NVIDIA Campus Expansion (Santa Clara)
- Yahoo Campus Expansion (Santa Clara)
- Augustine-Bowers Office Park Project (Santa Clara)

Appendix E of the TIA contains a full list of approved and not occupied projects. The trips for each of the background projects were added to the existing volumes discussed above to represent Background Conditions.

Cumulative Scenario

In addition to the vehicle trips from "approved but not yet built" and "not occupied" development projects discussed under Background Conditions, the Draft EIR evaluated vehicle trips from pending development projects in the study area in the cities of Sunnyvale, Cupertino, and Santa Clara. Similar to the approved developments, trip generation estimates from the pending development projects that would add traffic to the study intersections were obtained from their respective TIAs or estimated based on trip generation rates published in the Institute of Transportation Engineers *Trip Generation* (9th Edition). The trips for each of the projects were then assigned to the roadway network based on population and employment data, existing and estimated future travel patterns, and recent TIAs completed in the area. Projects larger than 20 residential units or 10,000 square feet of office/commercial space were considered.

In total, 39 projects were included in the Cumulative Conditions scenario. Notable projects evaluated include:

- Gateway Village (Santa Clara)
- Centennial Gateway (Santa Clara)
- City Place (Santa Clara)
- Butcher's Corner (Sunnyvale)

Appendix E of the TIA contains a full list of pending projects from the City of Sunnyvale and surrounding jurisdictions and their assumed trip generation estimates.

The trips for each of the approved, not occupied, and pending development projects were added to the existing volumes, which were multiplied by City specified annual growth rates, to represent Cumulative No Project Conditions.

The Cumulative traffic scenario for the project adequately captures projects that have the potential to impact traffic in the project area and no change is needed in the Draft EIR.

Neighborhood Analysis and Cut-Through Traffic

Several commenters state that the focused neighborhood analysis does not take into account transportation impacts associated with nearby projects under construction or in planning (such as the Apple Campus 2) and potential impacts of cut-through traffic. Commenters described their observations that cut-through traffic has grown in recent years due to traffic congestion along arterials associated with nearby construction (such as the Apple Campus 2) and the popularization of new GPS navigation apps (like Waze and Google Maps). Commenters express concern that cut-through traffic has exacerbated traffic congestion and led to decreased safety within the neighborhood. Commenters question why the neighborhood analysis included Existing Conditions but did not include Background Conditions or Cumulative Conditions.

Traffic counts captured all vehicle trips in the project area and including the neighborhood during the time it was measured. Cut-through traffic is defined as vehicles traveling through a neighborhood without a destination or origin within that neighborhood. The project would not contribute to cut-through traffic as it would generate trips to the project site.

The DEIR does not analyze neighborhood intersections in the Background or Cumulative scenarios because these intersections are largely insulated from regional traffic patterns and regional traffic growth, and projects such as the Apple Campus 2 will not cause these intersections to operate at unacceptable levels. However, the Draft EIR recognizes that cut-through traffic represents a key community concern, especially as it relates to safety. Cut-through traffic is unpredictable by definition, but it is worth noting that as part of its approval process, the Apple Campus 2 was required to set aside funds to monitor cut-through traffic (including traffic in the cities of Sunnyvale and Santa Clara) and potentially install traffic-calming measures should issues arise due to the Apple Campus 2 implementation. This issue is continuously monitored by the City of Sunnyvale and would be addressed as appropriate.

MASTER RESPONSE 2: TRAFFIC EXISTING CONDITIONS/ SAFETY – BICYCLE AND PEDESTRIAN

Comment letters refer to existing traffic conditions in the project area and express concern about potential impacts from additional project traffic. Key concerns expressed in the comment letters include neighborhood traffic safety, neighborhood traffic congestion, and the project's trip generation and its contribution to traffic congestion and safety concerns. Section 3.14 Transportation and Traffic outlines project impacts to both the circulation system and pedestrian and bicycle systems in the area. Project impacts were assessed based on existing traffic counts (volume of cars in the neighborhood), estimated additional cars in the neighborhood from project operation, and existing conditions, such as the presence or lack of sidewalks and crossings. Site visits were conducted to observe the pedestrian and bicycle systems as well as vehicular use in the project area during school drop-off and pickup times. The surrounding area schools were taken into account when assessing existing conditions and pickup/drop-off patterns were also evaluated. Project impacts would be mitigated to less than significant levels through mitigation measures included in Section 3.14 Transportation and Traffic. It is important to note that, as outlined in CEQA Section 15126.4, mitigation measures can be imposed only for impacts that would occur directly from the project. The project cannot make up for current or existing deficits in the transportation system.

Existing Conditions

Traffic counts and observations were conducted during regular school days during the months of March, April, and May, 2015. Traffic volumes were observed to increase for drop-off and pick-up activity associated with the neighborhood's schools; however, these increased volumes were observed to be temporary and all intersections were found to operate acceptably during the AM, afternoon, and PM peak hours. Observation included drop-off and pick-up activities at near-by schools, such as Lochinvar Avenue at Laurelwood Elementary, one of the main areas of concern outlined in the comment letters.

The following findings were made by City of Sunnyvale staff:

- Inverness has higher traffic volume than Lochinvar during the morning school drop-off time from 8:00 AM to 8:15 AM.
- Almost all of the morning and evening traffic going through the intersection is associated with school traffic.
- The maximum queue length observed was 15 vehicles traveling east toward school on Inverness at its intersection with Lochinvar in the morning.
- Staff observed a high number of children walking to the school, and they were helped by the crossing guard to cross the intersection.
- The crossing guard frequently stopped traffic on all approaches of the intersection to ensure safety of the school kids, which resulted in some additional queues.
- The traffic congestion only lasted for 15 minutes in the morning between 8:00 AM to 8:15 AM; after that, the queues dissipated. This is due to a school start time of 8:15 AM. Staff recorded a video, which we can make available on request, which shows no queues present after the start of school.

- The drivers and majority of pedestrians were moving in an orderly manner following traffic rules. However, on a few occasions, drivers blocked the intersection because of parents blocking the entrance to the school as they dropped off children.

- The intersection has had no collisions during the last three years. Staff did not find an operational deficiency at the intersection.

The City of Sunnyvale collected additional data in September 2015 in the project area to assess if traffic-calming measures were necessary per the community's request. In order for a street to be eligible for traffic calming, 85 percent of the vehicles driving on the roadway must be traveling at speeds above 32 miles per hour (MPH) or the average traffic volume must exceed 1,000 vehicles per day (vpd). Where there is concern for a few drivers considerably exceeding the speed limit, at least 5 percent of the vehicles driving on the roadway must be traveling at speeds above 35 MPH. Further, it was observed that on the local segment of Lochinvar Avenue, between Dunford Way and Inverness Way, cars averaged 19.9 MPH, and only 4 percent of the vehicles exceeded 35 MPH. This is considered a low percentage of cars and as such City staff found that the project area does not meet City of Sunnyvale conditions for traffic-calming measures. Lastly, spot speed surveys were conducted on Nightingale, Peacock, and Lochinvar Avenues, and the free-flow speeds were found to correlate with the threshold of the posted speed limits; no speeding issue was identified.

The City was awarded a grant to implement Safe Routes to School improvements where needed. The following improvements were identified in the project area, which the City will implement in 2016, regardless of project approval:

- Installation of high-visibility crosswalks along Dunford Way at the intersections of Lochinvar Avenue, Partridge Avenue, Oriole Avenue, and Norman Drive/Marion Way. Construction bids have been received, and the City is in the process of awarding a contract for construction.

- Installation of an In-Road Warning Light System at the eastern crossing of Dunford Way and Quail Avenue. Construction bids have been received, and the City is in the process of awarding a contract for construction.

- Installation of stop sign on Oriole Avenue at Dunford Way. Construction bids have been received, and the City is in the process of awarding a contract for construction.

- Restriction of parking along Dunford Way between Norman Drive and Oriole Avenue (implemented).

As outlined by City staff, the project area did not meet traffic-calming measures criteria.

Project Trip Generation and Neighborhood Circulation Impacts

Trip generation for the project was developed based on travel patterns observed at similar Stratford School locations in Sunnyvale and San Jose. Two-day (48-hour) driveway counts were conducted in April/May 2015 for the AM, afternoon, and PM peak hours at De Anza Elementary School in Sunnyvale (576 students, Kindergarten through 5th grade) and San Jose Middle School in San Jose (172 students, 6th through 8th grades). The total trips in and out were divided by the total students to develop a Stratford-specific trip generation rate per student. These Stratford-

specific rates were found to be higher than standard rates published by the Institute of Transportation Engineers *Trip Generation* (9th Edition). For a conservative estimate, the higher vehicle trip generation rates calculated at specific existing Stratford Schools were used in this analysis; and no reductions were developed for students walking, biking, or riding transit or school buses.

The addition of new vehicle trips associated with Stratford School was not found to cause any neighborhood intersections to operate unacceptably during the AM, afternoon, and PM peak hours under the Existing Plus Project scenario. As outlined in Section 3.14 Transportation and Traffic, the project applicant will work with the City to monitor traffic circulation around the project site and resolve circulation issues if they occur.

Mitigation Measures

The transportation studies performed for the project acknowledge the need for improved bicycle and pedestrian safety in the project area. Impact 3.14.5 discusses the existing conditions and project impacts for both pedestrian and bicycle system. The discussion is based on field observations, as well as City and community input. Project mitigation measures (**MM 3.14.5 a** and **b**) include installation of sharrows[1], and the funding of an engineering study to determine the need for new crosswalks and yield signs. The project applicant shall also fund the installation of school frontage signs. These measures were found to adequately mitigate the project's impacts on existing conditions. The measures would increase safety in the project area for both Stratford school students as well as the community at large, which would be able to take advantage of planned improvements.

As mentioned above, mitigation measures must be roughly proportional to the impacts of the project and must have an essential nexus between the mitigation measure and a legitimate governmental issue (CEQA Section 15126.4 (4A and B)). Mitigation measures cannot be imposed on a project for conditions it would not cause. In collaboration with City and transportation professionals it was determined that based on projected impacts, mitigation measures adequately reduce project impacts to a less than significant level.

MASTER RESPONSE 3: ALTERNATIVES

Comment letters suggest different potential alternatives and/or variations on the project alternatives. The City appreciates the public interest and suggestions regarding the alternatives evaluated in the EIR.

The applicant and/or the City may consider other alternatives regarding the structure's future use; however, the EIR need not analyze alternatives that do not change the significance of environmental impacts. Also under the "rule of reason" (CEQA Guidelines Section 15126.6(f)), alternatives need only be those that allow a reasoned choice. The alternatives are limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR needs to examine in detail only those that the lead agency

1 A shared lane pavement marking used to indicate a shared lane for bicyclists and vehicles.

determines could feasibly attain most of the basic project objectives. The range of feasible alternatives is selected and discussed in a manner to foster meaningful public participation and informed decision-making.

The City chose to analyze two project alternatives in addition to the CEQA-required No Project alternative to provide decision-makers a reasonable range of alternatives. A reduced capacity alternative was selected to potentially minimize air quality, greenhouse gas emissions, and transportation impacts. Further, the adult school alternative was selected to provide an alternative that would avoid transportation and recreation impacts. Alternative 3 was also selected to reflect the community's concern regarding use of Raynor Park by the project applicant.

It is important to note that the No Project Alternative describes the "environmental effects of the property remaining in its existing state against the environmental effects which would occur if the project is approved" (CEQA Guidelines Section 15126.6(e)(3)(B)). Therefore, the No Project Alternative is to leave the structure as is with no additional improvements and with no identified tenant.

Numerous comments noted the presence of other development proposals for the project area. CEQA does not require that every other potential development proposal for the site be analyzed as an alternative in the EIR. CEQA requires analysis of a reasonable range of alternatives to the project. Based on CEQA Guidelines Section 15126.6, the alternatives selected present the decision makers with enough information to aid in the decision-making process

As such, no change is required in the Draft EIR.

MASTER RESPONSE 4: JOINT USE AGREEMENT

Comment letters expressed concern with the Joint Use Agreement that would give the applicant the exclusive right to use a portion of Raynor Park during certain hours, which is adjacent to the project area. The CEQA document and process looks at impacts of the project on the environment. In the case of recreational impacts, CEQA Guidelines Appendix G significance criteria directs the lead agency to determine if the project would increase the use of neighborhood and regional parks such that substantial degradation would occur and if the project would include the construction of recreational facilities that would in turn have environmental impacts.

The use of Raynor Park is discussed in Section 3.12 Recreation of the Draft EIR. As described, most casual park use takes place after 6:00 PM on weekdays and all day during weekend days. As observed by Raynor Park maintenance staff, between 8:00 AM to 2:30 PM casual users include joggers, dog walkers, and playground users and are estimated at 20 to 40 people. Usage is heavier during summer months from mid-June to mid-September and lighter during the school year. The majority of those users recreate in the playground area, with only dog walkers occasionally using the field areas to walk their dogs. Walkers and joggers usually walk or run around the park's perimeter. Picnicking facilities and the playground and skateboard areas, which have the heaviest usage during school hours, are not part of the Joint Use Agreement and the public would continue to use those facilities without any restrictions.

Further, the Joint Use Agreement restricts Stratford School's after-hours use to accommodate evening use, when Raynor Park has higher usage, and allows public use of Areas 1 and 2 (see Figure 3.12-2 in the DEIR) during Stratford priority hours when the school is not using the space.

Based on field observations, expected project use, and City policies, the project would not substantially degrade Raynor Park so that it would create a significant environmental impact. Further, because the areas of heaviest use have unrestricted community usage, few users during school hours, and availability of Areas 1 and 2 during and after Stratford use and on weekends, the project would not displace a substantial number of casual users that would lead to substantial deterioration of regional parks or other facilities. As discussed in the Draft EIR, the project would include the construction of a basketball court; such construction and operation impacts are studied in each Draft EIR section.

Comments note the Joint Use Agreement and its impact on park usage. The Joint Use Agreement was analyzed in the Draft EIR to encompass potential environmental impacts on Raynor Park. The agreement in and of itself and its execution falls under the authority of the City's decision making body and the agreement itself is not a project under CEQA. Further, as noted in the Draft EIR the City has in place policies for field maintenance. The funding of such programs, as noted in the Draft EIR comments, is not considered a project under CEQA.

2.5 RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- Comment letters from government agencies are coded by acronyms and each issue raised in the comment letter is assigned a number (e.g., Comment Letter CAL, comment 1 is referred to as CAL-1).

- Comment letters from the public are coded by letters and each issue raised in the comment letter is assigned a number (e.g., Comment Letter A, comment 1 is referred to as A-1).

Where changes to the Draft EIR text result from responding to comments, those changes are included in the response and demarcated with revision marks: <u>underline</u> for new text, ~~strike-out~~ for deleted text.

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
FAX (510) 286-5559
TTY 711
www.dot.ca.gov

CALTRANS

Serious Drought. Help save water!

November 10, 2015

SCL082479
SCL/82/PM 14.9
SCH# 2015042054

Ms. Momoko Ishijima
Planning Division
City of Sunnyvale
456 W. Olive Street
Sunnyvale, CA 94086-3707

Dear Ms. Ishijima:

Stratford School at Partridge Avenue – Draft Environmental Impact Report

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Caltrans has reviewed the Draft Environmental Impact Report (DEIR) to ensure consistency with its mission and state planning priorities of infill, conservationism, and efficient development. Please refer to the previous comment letter, dated May 19, 2015, on this project. Caltrans provides these comments consistent with the State's smart mobility goals to support a vibrant economy and build communities, not sprawl. CAL-1

Project Understanding

The proposed project is approximately one mile from the State Route (SR) 82 (El Camino Real)/Lawrence Expressway interchange. It would modernize the existing buildings to serve a population of a maximum of 520 students. The initial use of the Stratford School at Partridge Avenue (Stratford) would be for middle school students with an expected capacity of 460 students. The proposed project would include modernization of all existing buildings, fixtures, and improvements to meet any required Americans with Disabilities Act (ADA) standards and fire codes. Minor exterior nonstructural improvements would include a new circulation driveway and fencing. The proposed project would include modifications to the building façade with contemporary colors and materials. Post construction, all surfaces would be repainted and landscaping would be upgraded. The project would include the construction of a basketball court in Raynor Park near the southeast corner of the school property. CAL-2

Lead Agency

As the lead agency, the City of Sunnyvale (City) is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution,

financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures, particularly if SR 82 (El Camino Real) segments, Interstate (I-) 280 segments, or the SR 82 (El Camino Real)/Wolfe Road intersection and left-turn pockets fall below the acceptable threshold.

Vehicle Trip Reduction

Caltrans encourages the City to locate future housing, jobs and employee-related services near major mass transit centers with connecting streets configured to facilitate walking and biking. This would promote mass transit use thereby reducing regional VMT and traffic impacts. Travel Demand Management (TDM) programs should be monitored and documented with annual reports by an onsite TDM coordinator to demonstrate effectiveness. This smart growth approach is consistent with MTC's Regional Transportation Plan/Sustainable Community Strategy goals of both increasing non-auto mode transportation, and reducing per capita VMT by 10 percent each.

To encourage alternate forms of transportation, reduce regional vehicle miles traveled and lessen future traffic impacts on the state highways, Caltrans recommends the project reduce the number of car parking spaces. For sample parking ratios and strategies that support compact growth, please refer to "Reforming Parking Policies to Support Smart Growth," a Metropolitan Transportation Commission study funded by Caltrans. Also, add additional bicycle parking for the project and coordinate with local Safe Routes to School programs to encourage students to use active transportation. CAL-3

Caltrans encourages the project to participate in the 511.org SchoolPool RideMatch service and work with the City to construct sidewalks and bicycle lanes in the neighborhood, in order to encourage biking and walking, and reduce vehicle trips generated by the project. A fully connected network of bicycle and pedestrian facilities will provide a viable alternative to driving, facilitate transit use, and help reduce air pollution and greenhouse gas emissions. The project should propose clear, actionable language for the proposed bicycle and pedestrian facilities, to ensure improvements are constructed as specified in the proposed project. Sidewalks "must" (not "should") comply with the Americans with Disabilities Act (ADA) and ensure ADA accessibility. CAL-4

Please note that, per Highway Design Manual Section 1003.3, a Class III bike route requires signing, striping, and generally improved conditions for bicyclists. If streets in the project area are to be considered Class III routes, Caltrans recommends they follow the Highway Design Manual guidance. CAL-5

Traffic Impact Fees

Given the project's contribution to area traffic and its proximity to SR 82 and Interstate 280, the project should contribute fair share traffic impact fees. These contributions would be used to lessen future traffic congestion and improve transit in the project vicinity. CAL-6

Voluntary Contribution Program
Caltrans encourages the City to participate in the Santa Clara Valley Transportation Authority's (VTA) voluntary contribution program and plan for the impact of future growth on the regional transportation system.

Should you have any questions regarding this letter, please contact Brian Ashurst at (510) 286-5505 or brian.ashurst@dot.ca.gov.

Sincerely,

Pat C

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: Scott Morgan, State Clearinghouse
Robert Swierk, Santa Clara Valley Transportation Authority (VTA) – electronic copy
Robert Cunningham, Santa Clara Valley Transportation Authority (VTA) – electronic copy

RESPONSE TO LETTER CAL – CALIFORNIA DEPARTMENT OF TRANSPORTATION (CAL)

Response to Comment CAL-1

The commenter states that the comments included in the letter are consistent with the State's smart mobility goals which were identified in a previous Caltrans letter dated May 19, 2015.

This letter was received as a part of the Notice of Preparation (NOP) comment period and is included in the Draft EIR in Appendix A. As stated in Section 1.7 of the Draft EIR, comment letters received during the NOP review period were considered during the preparation of the Draft EIR. The commenter does not discuss the adequacy of the Draft EIR with this comment. Comment noted.

Response to Comment CAL-2

The commenter describes the proposed project.

The commenter does not discuss the adequacy of the Draft EIR with this comment. Comment noted.

Response to Comment CAL-3

The comment notes that the project should encourage alternate forms of transportation, including the provision of sufficient bicycle parking and reduce parking spaces.

The commenter does not discuss the adequacy of the Draft EIR with this comment. Comment noted. We would like to note that the project proposes to provide 30 bicycle parking spaces to encourage multimodal access, which was determined to be an adequate number of bicycle parking spaces to serve the project, as discussed in the project's TIA.

Response to Comment CAL-4

The commenter encourages the project to participate in the 511.org SchoolPool RideMatch program and to work with the City to construct sidewalks and bicycle lanes in the neighborhood.

As noted in the Draft EIR, the City is in the process of implementing several safe routes to school improvements in the neighborhood to facilitate multimodal access. These improvements will increase the safety and attractiveness of walking to and from the proposed school, and thus encourage multimodal transportation. It is within the City's purview to participate in the 511.org SchoolPool RideMatch program and is not an issue under CEQA.

Response to Comment CAL-5

The commenter notes that the City should consult the Highway Design Manual when considering Class III bicycle facilities in the neighborhood.

This comment does not address the adequacy of the Draft EIR. The City designated Dunford Way/Marion Way, Quail Avenue, Inverness Way, and Lochinvar Avenue as Class III bike routes,

and used the Highway Design Manual in its decision-making process. Further, the project would install sharrows in the project area as outlined in the Draft EIR. Comment noted.

Response to Comment CAL-6

The commenter suggests the project should pay its fair share contribution to traffic impact fees.

The freeway segments analyzed in the project's traffic study is along I-280. It was determined that the project would not degrade level of service to unacceptable levels and would not add trips greater than one percent of traffic to this freeway segment. Therefore, the City determined that a fair share contribution is not required for the project. However, the City participates in the Santa Clara VTA voluntary contribution program when a project within Sunnyvale has a regional impact and when such a project is identified.

Response to Comment CAL-7

The commenter encourages the City to participate in the Santa Clara Valley Transportation Authority's voluntary contribution program.

See Response to Comment CAL-6.

County of Santa Clara
Roads and Airports Department

101 Skyport Drive
San Jose, California 95110-1302
1-408-573-2400

November 9, 2015

CSC

Momoko Isjijima
Associate Planner
P.O. Box 3707,
Sunnyvale, CA 94088-3707

SUBJECT: Notice of Availability of Draft Environmental Impact Report
Stratford School at Partridge Avenue

Dear Ms. Ishijima:

The County of Santa Clara Roads and Airports Department appreciates the opportunity to review to the draft environmental impact report (DEIR) and is submitting the following comments.

- The DEIR did not use the CMP 2014 traffic signal timing information in the PM peak for the intersection of Lawrence Expressway/Homestead Road (CMP location) resulting in inconsistent Level of Service (LOS) findings from CMP. Similarly, for expressway intersections that are not CMP, the analysis should be conducted using County signal timing. Please contact Ananth Prasad at (408) 494-1342 or Ananth.Prasad@rda.sccgov.org for this information. The correct existing signal timing must be used as it affects the results of the other scenarios and the identification of traffic impacts to expressway intersections. Please revise the Traffic Impact Analysis and EIR appropriately so that significant impacts can be properly identified and mitigated. CSC-1
- Section 5.1, page 5.0-1 of the DEIR identifies "significant and unavoidable impact" at the intersection of Lawrence Expressway/Benton Street. The preliminary *Comprehensive County Expressway Planning Study – 2040* project identified grade separation as a potential mitigation measure at this location. The project should provide a fair share contribution towards this mitigation measure. CSC-2

If you have any questions about these comments, please contact Aruna Bodduna at 408-573-2462 or at aruna.bodduna@rda.sccgov.org.

Sincerely,

Aruna

for Dawn S. Cameron
County Transportation Planner

cc: MA, AP

Board of Supervisors: Mike Wasserman, Cindy Chavez, Dave Cortese, Ken Yeager, S. Joseph Simitian
County Executive: Jeffrey V. Smith

RESPONSE TO LETTER CSC – COUNTY OF SANTA CLARA (CSC)

Response to Comment CSC-1

The commenter notes that the analysis did not use the CMP 2014 traffic signal timing information for the Lawrence Expressway/Homestead Road intersection and that other expressway intersections should include County timings.

At the time the study was compiled, the 2014 CMP information was not available through VTA; thus the 2012 CMP timing information was used for the analysis. Nonetheless, the EIR preparers updated the analysis to reflect the now-available 2014 timings, which are shown in **Tables CSC-1A, CSC-1B,** and **CSC-1C** below.

Based on the results presented in **Tables CSC-1A** and **CSC-1B**, the Lawrence Expressway intersections analyzed as part of this project continue to operate at acceptable levels (LOS E or better) under Existing and Background Conditions without and with the project. The project continues to have a cumulative impact at the Lawrence Expressway/Benton Street intersection (#11) as shown in **Table CSC-1C**. Since this impact was already identified in the Draft EIR, the updated analysis does not change the conclusions in the Draft EIR.

TABLE CSC-1A
EXISTING AND EXISTING PLUS PROJECT INTERSECTION LEVELS OF SERVICE
(BASELINE SCENARIO)

Intersection		Version	Peak Hour[2]	Existing Conditions		Existing plus Project Conditions				
				Delay[3]	LOS[4]	Delay[3]	LOS[4]	Δ in Crit. V/C[5]	Δ in Crit. Delay[6]	Signal Warrant Met?[7]
9/10	El Camino Real/ Lawrence Expressway* (CMP)	Original	AM PM	27.4 31.5	C C	27.5 31.6	C C	0.004 0.002	0.0 0.1	N/A
		Revised	AM PM	27.7 31.5	C C	27.8 31.6	C C	0.004 0.002	0.0 0.1	N/A
11	Lawrence Expressway/ Benton Street*	Original	AM PM	38.3 30.4	D+ C	42.0 32.1	D C-	0.025 0.014	4.5 2.1	N/A
		Revised	AM PM	41.3 34.7	D C-	45.3 36.1	D D+	0.012 0.010	1.0 1.1	N/A
16	Lawrence Expressway/ Homestead Road* (CMP)	Original	AM PM	51.7 52.1	D- D-	52.9 52.6	D- D-	0.008 0.005	2.6 0.7	N/A
		Revised	AM PM	46.7 50.0	D D	47.3 50.3	D D	0.008 0.005	1.1 0.4	N/A
17	Lawrence Expressway/ Lochinvar Avenue*	Original	AM PM	18.6 18.8	B- B-	18.8 19.0	B- B-	0.002 0.004	0.1 0.2	N/A
		Revised	AM PM	33.6 30.7	C- C	33.7 30.8	C- C	0.006 0.001	25.7 0.0	N/A

Notes:
1. Signal = Signalized Intersection; SSSC = Side-Street Stop Controlled Intersection.
2. AM = morning peak hour (between 7:00 and 9:00 AM), PM = evening peak hour (between 4:00 and 6:00 PM).
3. Whole intersection weighted average control delay expressed in seconds per vehicle for signalized intersections and all-way stop controlled intersections. Total control delay for the worst movement is presented for side-street stop-controlled intersections.
4. LOS = Level of Service calculations conducted using the TRAFFIX level of service analysis software package, which applies the methodology described in the *2000 HCM*.
5. Change in critical volume-to-capacity ratio (V/C) between Existing and Project Conditions.
6. Change in critical movement delay between Existing and Project Conditions.
7. Signal warrant based on CA MUTCD Warrant 3, Peak Hour Volume (Urban Area).

N/A = Not Applicable
Source: Fehr & Peers, September 2015.

TABLE CSC-1B
BACKGROUND AND BACKGROUND PLUS PROJECT INTERSECTION LEVELS OF SERVICE (BASELINE SCENARIO)

Intersection		Version	Peak Hour[2]	Background Conditions		Background plus Project Conditions				
				Delay[3]	LOS[4]	Delay[3]	LOS[4]	Δ in Crit. V/C[5]	Δ in Crit. Delay[6]	Signal Warrant Met?[7]
9/10	El Camino Real/ Lawrence Expressway* (CMP)	Original	AM PM	22.2 32.2	C+ C-	22.2 32.3	C+ C-	0.004 0.002	0.0 0.1	N/A
		Revised	AM PM	25.7 32.2	C C-	25.8 32.3	C C-	0.006 0.002	0.1 0.1	N/A
11	Lawrence Expressway/ Benton Street*	Original	AM PM	45.2 32.9	D C-	51.4 34.6	D- C-	0.025 0.014	8.8 2.2	N/A
		Revised	AM PM	45.8 37.4	D D+	52.0 38.7	D- D+	0.025 0.010	8.6 0.9	N/A
16	Lawrence Expressway/ Homestead Road* (CMP)	Original	AM PM	59.7 53.9	E+ D-	61.1 54.4	E D-	0.008 0.005	2.8 0.7	N/A
		Revised	AM PM	55.0 51.5	E+ D-	55.9 51.8	E+ D-	0.008 0.005	1.3 0.4	N/A
17	Lawrence Expressway/ Lochinvar Avenue*	Original	AM PM	19.7 19.5	B- B-	19.9 19.7	B- B-	0.002 0.004	0.1 0.2	N/A
		Revised	AM PM	23.0 31.7	C C	23.2 31.8	C C	0.002 0.001	0.2 0.0	N/A

Notes:
* Regionally significant intersection
1. Signal = Signalized Intersection; SSSC = Side-Street Stop Controlled Intersection.
2. AM = morning peak hour (between 7:00 and 9:00 AM), PM = evening peak hour (between 4:00 and 6:00 PM).
3. Whole intersection weighted average control delay expressed in seconds per vehicle for signalized intersections and all-way stop controlled intersections. Total control delay for the worst movement is presented for side-street stop-controlled intersections.
4. LOS = Level of Service calculations conducted using the TRAFFIX level of service analysis software package, which applies the methodology described in the *2000 HCM*.
5. Change in critical volume-to-capacity ratio (V/C) between Existing and Project Conditions.
6. Change in critical movement delay between Existing and Project Conditions.
7. Signal warrant based on CA MUTCD Warrant 3, Peak Hour Volume (Urban Area).

N/A = Not Applicable
Source: Fehr & Peers, September 2015.

TABLE CSC-1C
CUMULATIVE AND CUMULATIVE PLUS PROJECT INTERSECTION LEVELS OF SERVICE
(BASELINE SCENARIO)

Intersection		Version	Peak Hour[2]	Cumulative Conditions		Cumulative plus Project Conditions				
				Delay[3]	LOS[4]	Delay[3]	LOS[4]	Δ in Crit. V/C[5]	Δ in Crit. Delay[6]	Signal Warrant Met?[7]
9/10	El Camino Real/ Lawrence Expressway* (CMP)	Original	AM	28.1	C	28.2	C	0.004	0.1	N/A
			PM	47.4	D	47.8	D	0.002	0.6	
		Revised	AM	31.9	C	32.1	C-	0.006	0.2	N/A
			PM	47.4	D	47.8	D	0.002	0.6	
11	Lawrence Expressway/ Benton Street*	Original	AM	**81.4**	**F**	**89.2**	**F**	**0.025**	**12.3**	N/A
			PM	46.4	D	49.7	D	0.014	4.9	
		Revised	AM	**84.2**	**F**	**91.2**	**F**	**0.025**	**10.9**	N/A
			PM	46.6	D	49.9	D	0.014	4.5	
16	Lawrence Expressway/ Homestead Road* (CMP)	Original	AM	**84.7**	**F**	**86.4**	**F**	**0.006**	**2.6**	N/A
			PM	77.9	E-	78.7	E-	0.005	1.2	
		Revised	AM	**84.7**	**F**	**86.4**	**F**	**0.006**	**2.6**	N/A
			PM	77.9	E-	78.7	E-	0.005	1.2	
17	Lawrence Expressway/ Lochinvar Avenue*	Original	AM	28.2	C	28.5	C	0.002	0.4	N/A
			PM	22.6	C+	22.8	C+	0.004	0.3	
		Revised	AM	37.4	D+	37.9	D+	0.006	2.6	N/A
			PM	26.8	C	27.1	C	0.004	0.4	

Notes:

* Regionally significant intersection

1. Signal = Signalized Intersection; SSSC = Side-Street Stop Controlled Intersection.
2. AM = morning peak hour (between 7:00 and 9:00 AM), PM = evening peak hour (between 4:00 and 6:00 PM).
3. Whole intersection weighted average control delay expressed in seconds per vehicle for signalized intersections and all-way stop controlled intersections. Total control delay for the worst movement is presented for side-street stop-controlled intersections.
4. LOS = Level of Service calculations conducted using the TRAFFIX level of service analysis software package, which applies the methodology described in the *2000 HCM*.
5. Change in critical volume-to-capacity ratio (V/C) between Existing and Project Conditions.
6. Change in critical movement delay between Existing and Project Conditions.
7. Signal warrant based on CA MUTCD Warrant 3, Peak Hour Volume (Urban Area).

N/A = Not Applicable

Source: Fehr & Peers, September 2015.

Response to Comment CSC-2

The commenter notes that as part of the project's cumulative impact to the Lawrence Expressway/Benton Street intersection, the project applicant should consider a fair share contribution to the planned grade separation at this location.

The project contributes approximately 1.7 percent of the total trips at the intersection under the Baseline Cumulative Plus Project Scenario during the AM peak hour. The City will consider a fair share contribution. The intersection was identified as a Tier 3 improvement, but there is no implementation timeline and no fees are collected for such improvements at the time. Comment noted and no changes made.

SANTA CLARA UNIFIED SCHOOL DISTRICT

1889 Lawrence Road
Santa Clara, CA
95051
408-423-2000

Stanley Rose III, Ed.D.
Superintendent

SCUSD

VIA EMAIL

November 9, 2015

Momoko Ishijima
Associate Planner
City of Sunnyvale
Department of Community Development
P.O. Box 3707
Sunnyvale, CA 94088-3707
mishijima@sunnyvale.ca.gov

RE: EIR for Stratford School at Partridge Avenue

Dear Ms. Ishijima,

The Santa Clara Unified School District (SCUSD) appreciates the opportunity to provide comments on the California Environmental Quality Act (CEQA) Draft Environmental Impact Report (EIR) for the Stratford School at Partridge Avenue. The proposed project includes converting the Raynor Activity Center, originally an elementary school, to a middle school with no more than 520 students. The site has not been used for a school in approximately 30 years.

The Santa Clara Unified School District's Peterson Middle School is located across Dunford Way from the Stratford site. Patrick Henry, an SCUSD site, which is currently leased to other schools, is also across the street and Laurelwood Elementary School is a few blocks away. Students attending the SCUSD's schools often walk and ride bikes to school. The Stratford School is a private school, not a neighborhood school, and the students will be driven to the campus daily. The SCUSD is concerned about the increase in traffic around the three SCUSD school sites. The safety of our students, who walk and bike to school, is a major concern. The 1,458 daily trips estimated in the EIR has a large impact on the residential neighborhood. SCUSD-1

Safe Routes to Schools is vital for every student's safety and Stratford must assist the City of Sunnyvale with all of the recommendations from Safe Routes to Schools as needed, as well as implement the recommendations from the traffic engineering study as soon as it is complete. SCUSD-2

Sincerely,

Michal Healy

Michal Healy
SCUSD Bond Program Consultant

Board
of Education
...
Jim Canova
Albert Gonzalez
Jodi Muirhead
Andrew Ratermann
Michele Ryan Ph.D.
Noelani Sallings
Christopher Stampolis

RESPONSE TO LETTER SCUSD – SANTA CLARA UNIFIED SCHOOL DISTRICT (SCUSD)

Response to Comment SCUSD-1

The commenter expresses concerns regarding safety impacts associated with increased vehicle trips around several schools in the area, including Peterson Middle School, Laurelwood Elementary School, and Patrick Henry, a SCUSD site. The comment notes that many SCUSD students walk or bike to school and are vulnerable roadway users.

Please see Master Response 2.

Response to Comment SCUSD-2

This comment requests that Stratford School assist the City of Sunnyvale with Safe Routes to Schools improvements and implement the recommendations of the traffic engineering study as soon as possible.

The Draft EIR states that the project shall fund the City's engineering study to determine the need for the installation of crosswalks and yield signs at several intersections. If the engineering study finds that crosswalks and yield signs are warranted, the applicant shall fund their installation. The applicant shall also fund the installation of advance school warning signs in both directions along Dunford Way and Partridge Avenue along the school's frontage, if such need is identified in the engineering study. This is part of the project's mitigation monitoring and reporting plan and would be implemented during the timeline set by the City. Please note that Safe Routes to School improvements are a City of Sunnyvale initiative and are not dependent on the project. As such, it is outside of the scope of the project to assist with City proposed Safe Routes to School improvements. For a discussion of proposed improvements please see Master Response 2.

VTA

SANTA CLARA
Valley Transportation Authority

November 4, 2015

City of Sunnyvale
Planning Division
P.O. Box 3707
Sunnyvale, CA 94088-3707

Attention: Momoko Ishijima

Subject: Stratford School at Partridge Avenue

Dear Ms. Ishijima:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR for a 460-student middle school at 1500 Partridge Avenue. We have the following comments.

Pedestrian Accommodations

VTA commends the City and applicant for including Planned Safe Routes to School improvements in the TIA and DEIR, including new/enhanced crosswalks, signage and visibility improvements at several intersections along Dunford Way near the project site (TIA pgs. 108 - 109; DEIR pgs. 3.14-84 – 3.14-85). These improvements will increase the safety and attractiveness of walking to and from the proposed school, thereby reducing automobile trips and greenhouse gas emissions associated with the development. VTA-1

However, VTA disagrees with the assertion at the end of the discussion of improvements that other pedestrian deficiencies near the site "are existing deficiencies that cannot be addressed by the Project" (p. 109). Specifically, VTA recommends that the City work with the applicant to address the following deficiencies: VTA-2

- The pedestrian accommodations along the project's Dunford Way frontage consist of 5-foot sidewalks with no buffer between pedestrians and traffic. VTA recommends including a buffer strip between pedestrians and automobiles with landscaping elements such as closely planted trees, shrubs, or light posts, while maintaining the same or greater width of clear walking space. Resources on pedestrian quality of service, such as the Highway Capacity Manual 2010 Pedestrian Level of Service methodology, indicate that such accommodations improve pedestrian perceptions of comfort and safety on a roadway. VTA-3

- The southeast corner of Dunford Way and Partridge Avenue on the project frontage has a wide turning radius which encourages higher auto speeds and reduces pedestrian comfort and safety. VTA recommends squaring off the corner or otherwise reducing the speed of right turns at this location to facilitate pedestrian access to the site. VTA-4

VTA recommends including a map/figure of existing pedestrian facilities within 1,000 feet of the project boundaries, with an emphasis on presence/absence of sidewalks and gaps in the pedestrian network, per section 6.4 of the VTA *Transportation Impact Analysis (TIA) Guidelines*. VTA-5

Transit Analysis

VTA commends the City for including an analysis of transit vehicle delay, consistent with the updated 2014 VTA *TIA Guidelines* (Section 9.2) VTA-6

Auto Trip Reduction Statement (ATRS)

VTA commends the City for including an Auto Trip Reduction Statement (ATRS) as required per Section 8.2 and Appendix C of the updated 2014 *TIA Guidelines*. However, VTA notes that the ATRS did not include project features that could have been included under "Other TDM/Trip Reduction Measures," such as the proposed pedestrian improvements noted above. VTA notes that the ATRS is intended to highlight all project features and efforts that improve the multimodal transportation system and reduce automobile trips, whether or not a formal trip reduction was assumed in the TIA analysis. VTA-7

Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Sincerely,

Roy Molseed
Senior Environmental Planner

cc: Brian Brandert, Caltrans
Patricia Maurice, Caltrans

SU1506

RESPONSE TO COMMENT LETTER VTA – VALLEY TRANSPORTATION AUTHORITY (VTA)

Response to Comment VTA-1

The commenter commends the City and the applicant for including planned Safe Routes to School improvements in the TIA.

Comment noted.

Response to Comment VTA-2

The commenter disagrees that the other pedestrian deficiencies near the site are existing deficiencies that cannot be addressed by the project. VTA has a list of suggested improvements that are addressed in the following VTA comments.

See response below to specific suggested improvement. Please see Master Response 2 regarding existing conditions in the project area and Section 3.14 Transportation and Traffic for a description of existing pedestrian and bicycle facilities in the project area at the time the NOP was published. The existing conditions are regarded as existing deficiencies since they would be in the project area with or without the project. For example, the lack of sidewalks near the project site is not a project-induced impact, but is an existing condition.

Response to Comment VTA-3

The commenter recommends that the sidewalk on the project's frontage on Dunford Way be improved to include a buffer strip.

Please note that the City does not require frontage improvements for building reuse projects. The proposed project is considered a building reuse project. Comment noted and no changes made.

Response to Comment VTA-4

The commenter recommends that the turning radius at the Dunford Way/Partridge Avenue intersection should be reduced to reduce turning speeds of vehicles.

This recommended improvement is not considered an environmental issue. However, staff will take this into consideration during the design of off-site improvements. Comment noted and no changes made.

Response to Comment VTA-5

VTA recommends including a map/figure of existing pedestrian facilities within 1,000 feet of the project boundaries, with an emphasis on presence or absence of sidewalks in the pedestrian network.

Please see response to comment VTA-2 and Master Response 2.

Response to Comment VTA-6

The commenter commends the City for including a transit delay analysis.

Comment noted.

Response to Comment VTA-7

The commenter notes that project features could have been included in the "Other TDM/Trip Reduction Measures" section of the Auto Trip Reduction Statement.

This comment does not address the adequacy of the EIR. The Safe Routes to School improvements are a City initiative and not part of the project. Further, project improvements are adequately described in Section 2.0 Project Description or captured in mitigation measures. Comment noted and no change needed.

PC

November 9, 2015

Stratford School Draft EIR Public Hearing

Sunnyvale Planning Commission

Commission Comments

1. Larry Klein, Commissioner: only comment is traffic. Ongoing effects of cut-through traffic from Apple Campus. Whatever traffic calming effects, this is a cumulative issue. What percentage would new apple campus create? PC-1

2. Russell Melton, Chair: Page 2.0-13: objectives. Project proponent usually creates the objectives. PC-2 Describe how the City came about with the objectives. Page 3.14-22, field observations: add another field observation at Quail and Dunford, pedestrian flow between 7:20 and 7:50 am, observations contemplate the safe routes to school enhancements. PC-3

RESPONSE TO COMMENT LETTER PC – PLANNING COMMISSION (PC)

Response to Comment PC-1

The commenter inquires about impacts of cut-through traffic and the percentage that the Apple Campus 2 adds to the project area.

Please see Master Response 1.

Response to Comment PC-2

The commenter questions the project objectives and the process that the City undertook to develop them.

According to CEQA Guidelines Section 15124 (b) a project description needs to include "a statement of objectives sought by the proposed project." CEQA Guidelines do not prescribe whether the project objectives should be drafted by the project applicant or the City. The project applicant submitted project objectives, which the City modified to fit its needs.

Response to Comment PC-3

The commenter notes that another field observation needs to be added at Quail and Dunford to notice pedestrian flow between 7:20 and 7:50 AM.

All field observations were taken to present an accurate picture of neighborhood traffic and movement. Please see Master Responses 1 and 2.

Letter A

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Draft Environmental Impact of Report

Gilda Fracchia Sun, Sep 27, 2015 at 3:05 PM
To: mishijima@sunnyvale.ca.gov

Hi Momoko,

In response to the letter that was sent to us from the City of Sunnyvale, we have big concerns about having another private school
in the neighborhood. There has been so many close accident misses every morning at the corner of Lochinvar and Dunford. Children and parents are trying to get their children to Appleseed and cars are coming in and out at quick speeds. Having another school in the neighborhood is just going to add 1,000 cars more to the neighborhood five times a week. Not to mention the effects of the added carbons from the increase of more cars. We don't needs this. Kids won't be coming from this neighborhood, they will be coming from outside the neighborhood. Therefore, having a local school with kids walking to this school is not going to happen. A-1 A-2

We should look at making the site a mini community learning center. Make it a place where the families can learn about the environment a place where education, books and products can be sold to educate the community. The money from this center can go back to improving the environment and preservation of Sunnyvale. A-3

Best,

Andrew & Gilda Fracchia

RESPONSE TO LETTER A – FRACCHIA

Response to Comment A-1

The commenter expresses concerns over the impact of additional traffic congestion in the Birdland neighborhood as it relates to traffic safety, particularly at the intersection of Lochinvar and Dunford.

Please see Master Response 2 regarding existing conditions in the project area and additional traffic. Further, as described in Section 2.0 Project Description and Section 3.14 Transportation and Traffic, the project includes measures to ensure the safety of Stratford students and the neighborhood. Such measures include traffic circulation improvements, sign guards as pedestrian crossings, and installation of sharrows.

Response to Comment A-2

The commenter states her concern that this project would add carbons from the increase in cars to the neighborhood.

As discussed in Section 3.2 Air Quality of the Draft EIR under Impact 3.2.4, although the project would raise carbon monoxide levels in the project area, it would not be beyond acceptable levels. This project impact would be less than significant.

Response to Comment A-3

The commenter states that the site should be a mini community learning center and the money from the center can go back to improving the environment and the preservation of Sunnyvale.

The comment does not discuss the adequacy of the EIR with this comment. Please also see Master Response 3 regarding Alternative selections, as required by CEQA.

Letter B

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford School at Partridge Avenue - comment

Susan W . Thu, Oct 1, 2015 at 12:21 PM
To: mishijima@sunnyvale.ca.gov
Cc: Susan Werl .

Dear Momoko,

I am submitting my comments regarding the Stratford School at Partridge Avenue proposal:

1. First, I disagree about selling the property to a private party/company. Other cities have sold off land and have later regretted it, as the land is very likely to be needed in the future, especially for schools and populations increase and decrease over decades. I understand Laurelwood Elementary is heavily populated at 30 students per classroom. B-1
Where are the new students going to go who will come from the new apartment complex where Kohl's currently is? What about the apartments going in at Vallco?
When I worked in Palo Alto, my company had a building on Stanford land that was leased for 99 years. The company I worked for made improvements to the site and eventually added on square footage. I don't see why we don't do that.

2. I am also concerned about the additional traffic it will bring in to the currently pretty quiet neighborhood. At Laurelwood, when students are arriving and leaving, it really clogs up that area for blocks. I don't believe that asking parents to use cars less will not have much of an affect. Being a private school there won't be many families that live in the neighborhood. As a parent, I would not let my child walk to ride a bike across Lawrence Expwy, Homestead, Wolfe, or El Camino. B-2 B-3
This is exacerbated by the additional traffic that will be flowing soon into the new Apple Campus.

3. Re-directing the money. I read the proposal and it says the goal is to benefit the city. One proposal is to expand a pool. Pools have high liability and it seems like a luxury. I suggest spending the money on improving schools regarding safety, new books, etc. B-4

Sincerely,

Susan Werlich
Birdland resident

RESPONSE TO LETTER B – WERLICH

Response to Comment B-1

The commenter states her disagreement with the City selling the property to a private party/company.

The commenter does not discuss the adequacy of the Draft EIR. The purpose of the EIR is to analyze the impact of the proposed project on the environment. The decision to sell the property to a private party/company is not considered a physical environmental impact under CEQA and is therefore not analyzed in the EIR. Comment noted.

Response to Comment B-2

This comment highlights concerns over additional traffic congestion in the Birdland neighborhood.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 2 regarding project traffic additions and current conditions in the project area.

Response to Comment B-3

This comment states concerns over traffic safety issues along Lawrence Expressway, Homestead Road, Wolfe Road, and El Camino Real.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 2 regarding existing traffic in the project area. Further, Section 3.14 Transportation and Traffic describes expected project circulation patterns.

Response to Comment B-4

This comment suggests the need for greater focus on traffic safety near schools.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 2.

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Fwd: Strafford School at Patritdge Ave

Aida Rita Sued-Domínguez Wed, Oct 14, 2015 at 4:46 PM
To: mishijima@sunnyvale.ca.gov

Letter C

Sent from my iPad

Begin forwarded message:

From: Aida Rita Sued-Domínguez
Date: October 14, 2015 at 4:45:05 PM PDT
To: mishjima@sunnyvale.ca.gov
Subject: Strafford School at Patritdge Ave

My name is Aida Sued a resident of 1598 Quail Ave for the past 10 years. Traffic hazards will only increase with the addition of a private school to this site. With the added traffic due to the amount of construction in the area and more drivers using apps (such as waze) to help avoid such traffic, residential areas are being impacted. A school which will most definitely have the majority of the students being dropped off will be detrimental to the quality of life in this area. C-1

Aida

Sent from my iPad

RESPONSE TO LETTER C – SUED

Response to Comment C-1

This comment expresses concerns over traffic safety and the impact of cut-through traffic in the Birdland neighborhood.

Please see Master Response 1 regarding cut-through traffic and Master Response 2 regarding traffic safety.

Letter D

City of Sunnyvale Dept of Community Development

I am concerned that air quality would be reduced because of more Traffic. We already have Two schools in The immediate area. D-1

We also have a considerable amount of "Thru" Traffic from Wolfe Rd To Lawrence Expwy. D-2

Alice Hansen
1064 Hamshire CT
Sunnyvale, CA 94087

RECEIVED
OCT 27 2015
PLANNING DIVISION

RESPONSE TO LETTER D – HANSEN

Response to Comment D-1

The commenter states her concern that air quality would be reduced because of more traffic to the area and that there are already two schools in the area.

As shown in Section 3.2 of the Draft EIR, operational air quality impacts as well as carbon monoxide emissions from traffic would not exceed the federal and state air quality significance thresholds or the Bay Area Air Quality Management District's (BAAQMD) mobile source thresholds. Therefore, although there would be an increase in emissions in the project area, operational air quality impacts are considered less than significant under CEQA. Traffic from the other schools in the area is accounted for in the traffic analysis, and as such is taken into consideration in the air quality calculations. No change is needed.

Response to Comments D-2

This comment expresses concerns over the impact of cut-through traffic in the Birdland neighborhood.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 1 regarding cut-through traffic.

October 27, 2015

Letter E

RECEIVED

NOV 03 2015

PLANNING DIVISION

Momoko Ishijima, Associate Planner

P.O. Box 3707

Sunnyvale, CA 94088-3707

Dear Momoko Ishijima,

Regarding the Stratford School at Partridge Avenue, we who live in the neighborhood have some serious concerns about the impact it will have on all residents here.

- We already have parents driving kids to Appleseed, Laurelwood and Peterson. These schools are close to each other and to the Stratford site. The daily traffic pileup is a dangerous one. Adding non-resident drivers, drivers who aren't interested in preserving this as a quiet, safe neighborhood, to this already noxious mix is a recipe for accidents with bicycles and pedestrians, many of whom are children. E-1

- Already we have traffic diverted into the neighborhood because of very heavy traffic on the main arteries. By the time the new construction on all sides of us is finished, we will have very dangerous traffic conditions in our neighborhood. Additionally, the many new apartments are being built in this area and the children will need a public school to attend. Unfortunately, since our current schools are already seriously impacted, the only land for a new school is the Raynor site. E-2

- Stratford's additional impact on our neighborhood will be its use of our neighborhood park. The entire park is paid for by taxpayers. It is NOT a private park. Anyone can use it at any time. A private entity cannot preempt the public. To offer priority use of a public space to a business is completely unacceptable in every respect and will have a serious negative impact on the residents of this neighborhood. E-3

We are confident that you will look at what a residential neighborhood needs to be for its residents, especially the children. We have many small children here. Their safety and their quality of life are surely the top priority for all of us.

Sincerely,

William and Barbara Patton

933 Exmoor Way

Sunnyvale, CA 94087

RESPONSE TO LETTER E – PATTON

Response to Comment E-1

This comment expresses concerns over the impact of additional traffic congestion in the Birdland neighborhood as it relates to traffic safety. It notes the existing traffic volumes traveling to schools such as Appleseed, Laurelwood, and Peterson, and the safety challenges this traffic poses to children walking and biking.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 2 regarding traffic safety.

Response to Comment E-2

This comment expresses concerns over the safety impacts of cut-through traffic in the Birdland neighborhood due to surrounding construction and traffic congestion.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 1 regarding cut-through traffic and Master Response 2 regarding traffic safety.

Response to Comment E-3

The commenter states that the park is paid for by taxpayers and is not a private park. To offer priority of park use to a business is unacceptable and will have a serious negative impact on the residents of the neighborhood.

This comment does not discuss the adequacy of the Draft EIR. The commenter is correct in noting that the park is a public park owned and operated by the City of Sunnyvale. As such, the City of Sunnyvale has decision-making powers over the usage of the park. Further, the comment does not identify the potential negative impacts on the neighborhood from project implementation. The commenter is referred to Master Response 4 discussing the Joint Use Agreement for the park facilities and is referred to the discussion in Section 3.12 regarding park usage. Comment noted.

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Letter F

Stratford School Draft EIR

Wee Lee L
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

Tue, Nov 3, 2015 at 9:38 PM

Dear honorable members of the Sunnyvale City Council,

I am writing to highlight several deep flaws in the Stratford School Draft EIR and urge your rejection of the report.

A. Air quality impact

1. Table 3.2-3 (Page 3.2-5) shows that our area is already in violation of federal and/or state air quality standards for ozone, coarse particulate matter and fine particulate matter. An air quality impact is considered significant if among other things, the project would (i) violate any air quality standard or (ii) contribute significantly to an existing or projected air quality violation. Yet, the project is deemed not to have a significant impact on air quality on the basis of BAAQMD significance thresholds (Table 3.2-6) without converting the estimated emissions (pounds/day) into the air quality standards of Table 3.2-4 (ppm) to determine if the project actually causes a violation in additional air quality standards. Clearly, the project will already exacerbate the existing violations for ozone, coarse and fine particulate matter, but the report dismisses the effects by stating "the correlation between a project's emissions and increases in nonattainment days, or frequency or severity of related illnesses, cannot be accurately quantified" (Page 3.2-18) and blithely concludes that the project's impact is less than significant. The cumulative effect of the project's emissions on the existing air quality of this area needs to be determined, rather than comparing project contributions relative to a significance threshold. F-1
2. BAAQMD Regulation 14 (Page 3.2-10) requires measures to reduce emissions of air pollutants from mobile sources by reducing motor vehicle use and/or promoting use of clean fuels and low-emission vehicles. The report fails to quantify the project's impact on air quality measures and provides no measures to comply with Regulation 14. F-2
3. The report also claims that the project will not contribute to localized concentrations of mobile-source carbon monoxide that would exceed applicable ambient air quality standards (Page 3.2-20), the standard being increasing traffic volumes at affected intersections to more than 44,000 vehicles per hour. If you consider that the Levi stadium has just over 30,000 parking lots, even the stadium will not create a situation of more than 44,000 vehicles per hour! We need to take into account the context of the project and this threshold of 44,000 vehicles per hour is clearly not the correct standard to use to determine the project's impact on carbon monoxide emissions in a ***residential area with a park where many young children congregate and play***. Instead, the report needs to determine the air quality impact in ppm of carbon monoxide from the additional vehicle trips and determine if it leads to a violation of the standards listed in Table 3.2-4. F-3

B. Traffic

1. The traffic analysis in the report seems to assess the traffic situation as simply a capacity issue of having 312 cars driving through two-lane neighborhood roads. The situation is much worse than that because the cars are not just passing through - they are waiting to negotiate their way into the school, with most of the traffic coming within a very short window of time (15-30 minutes), causing major delays on all roads leading to the school. In particular, there is no analysis of how traffic would move along Dunford Way and Partridge Ave during the critical 15-30 minutes before the start of school. F-4
2. As a very rough estimate, assume the driveway on Dunford Way is about 200 ft and the proposed drive aisle on the east side of the project is 500 ft. Assuming an average car length of 13.5 ft plus space between cars of two feet, the capacity of the Dunford driveway is 13 cars and the capacity of the two-lane drive aisle is 64 cars. If each car takes only 10 seconds to pull up to the drop-off area, drop off the child and pull away, it would take 13 minutes just to clear these 77 cars, or about 52 minutes for the 312 F-5

projected in-bound trips.

3. So for the good part of an hour, more than 230 cars will be waiting to get into the drop-off loop, choking up traffic on Partridge Ave, Dunford Way through to Wolfe Road and Dunford Way through to Lawrence Expressway. The traffic congestion will be made worse by cars that have left the school on Partridge Ave and want to go back eastward on Dunford Way towards Lawrence Expressway, or westward towards Wolfe Road.
4. Given this scenario, it is not unexpected if cars from the west on Dunford Way will try to turn right from Dunford Way onto Partridge Ave so as to drop off their students on Partridge Ave across the school, creating a hazardous situation for these students as they meet cars traveling north on Partridge Ave after exiting the campus. Likewise, cars coming from the east on Dunford Way can expect long delays waiting to turn left into the Dunford driveway and are likely to be tempted to drop their students off on Dunford Way itself, creating an even more dangerous situation for their students. F-6
5. There is no substantiation that the mitigation measures (MM 3.14.1a-d) would reduce the impact of on-site circulation system to less than significant. In particular, MM3.14.1c is woefully inadequate to deal with the potential hazards listed above. F-7
6. The traffic analysis also does not take into the account the impact of all this additional traffic on the safety of children walking or biking to Peterson Middle School or Laurelwood Elementary School from within the neighborhood. F-8
7. It is also inconceivable that the 81 parking lots would be adequate for the operation of a school of 520 students (Page 3.14-78). Parents will likely have to park in the surrounding streets during school events, depriving neighborhood residents of their street parking. F-9

At the end of the day, Raynor School was built to serve students living in Birdland, not students who commute from elsewhere. Furthermore, Raynor School probably was not built to serve 520 students (or for that matter, 416 students per Alternative 2). The unalterable fact remains that the school is not situated in an area that can safely accommodate a school with 520 students mostly commuting from outside the neighborhood and no mitigation, save for busing all of the students from some central location outside the neighborhood, can ensure their safety. F-10

As discussed above, the Stratford School Draft EIR has deeply flawed methodologies and conclusions. It has not addressed the air quality impact of the project on an ongoing basis and completely misses the traffic and the safety issues for students and residents during peak drop-off times. A private school serving students commuting from elsewhere cannot be safely accommodated on this site and I strongly urge your rejection of the project. F-11

Thank you for your consideration.

Sincerely,
Wee-Lee Lim
Birdland resident and homeowner

RESPONSE TO LETTER F – LIM

Response to Comment F-1

The commenter states that the cumulative effect of the project's air emissions on existing air quality of the area needs to be determined rather than comparing project contributions relative to a significance threshold.

As stated in Section 3.2 Air Quality, air quality impacts were assessed in accordance with methodologies recommended by the California Air Resources Board (CARB) and BAAQMD. Criteria air pollutant emissions were modeled using the California Emissions Estimator Model (CalEEMod). CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operation from a variety of land use projects. This analysis uses the thresholds adopted by BAAQMD to determine the level of significance the project would have on existing air quality in the area. As shown, the project would have a less than significant impact on air quality under CEQA.

As the air quality analysis uses the recommended methodology approved by CARB and BAAQMD, no further analysis is warranted. In addition, the air quality analysis discusses cumulative air quality impacts and determines that, according to BAAQMD, if a project exceeds its identified significance thresholds, the project would be cumulatively considerable. Projects that do not exceed significance thresholds would not be considered cumulatively considerable. As such, the project would have a less than cumulatively considerable impact according to the guidelines established by BAAQMD and no further analysis is necessary. The cumulative scenario includes foreseeable projects in the project area and calculations are based on the project's expected contribution.

Response to Comment F-2

The commenter states that the DEIR fails to quantify the project's impact on air quality measures and provides no measure to comply with BAAQMD Regulation 14.

Section 3.2, Impact 3.2.3 discuses the project's potential to conflict with adopted air quality measures including BAAQMD's 2010 Clean Air Plan. The Draft EIR determined that the proposed project would conform with the project-applicable control measures. According to BAAQMD, Regulation 14 is applicable to employers with 50 or more full-time employees. For those employers, commuter benefit options, such as allowing covered employees to elect to exclude from taxable wages costs incurred for transit passes or vanpool charges, or a program whereby the employer offers employees a subsidy to offset the monthly cost of commuting via transit or by vanpool, or even transportation furnished by the employer at no cost, or low cost to employees in a vanpool or bus, or similar multi-passenger vehicle operated by or for the employer, are standards to comply with this regulation.[2] BAAQMD enforces this regulation and as such, mitigation requiring the enforcement of Regulation 14 is not necessary.

[2] BAAQMD. 2014. *Regulation 14 Mobile Source Emissions Reduction Measures Rule 1 Bay Area Commuter Benefits Program*. http://www.arb.ca.gov/DRDB/BA/CURHTML/R14-1.PDF

Response to Comment F-3

The commenter disagrees with the carbon monoxide threshold used in the Draft EIR and instead the DEIR should use a ppm [parts per million] threshold to determine if the project leads to a violation of these standards.

As shown in Table 3.2-9 in the Draft EIR, the BAAQMD does not have a threshold standard for carbon monoxide (CO). Therefore, based on BAAQMD guidance, the Draft EIR uses screening criteria to determine the significance level for CO. As shown on page 3.2-21 of the Draft EIR, these criteria include if:

1. The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plans, and local congestion management agency plans.

2. The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.

3. The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

As this is considered to be an acceptable screening method by the BAAQMD, no further CO analysis is necessary.

Response to Comment F-4

This comment states that the traffic analysis included in the Draft EIR is insufficient because it does not analyze the peak 15-30 minutes of school-related AM drop-off and PM pickup activity.

As outlined in Section 3.14 Transportation and Traffic, p. 3.14-37: "The amount of traffic added to the roadway system by the proposed project is estimated using a three-step process: (1) trip generation, (2) trip distribution, and (3) trip assignment. The first step estimates the amount of traffic added to the roadway network. The second estimates the direction of travel to and from the project site. The new trips are assigned to specific street segments and intersection turning movements during the third step. The succeeding section, Project Trip Generation, explains that to adequately calculate projected traffic, the EIR preparers collected traffic counts during pickup and drop-off times from two similar Stratford Schools in Santa Clara County. Traffic counts in the project area were also taken during the AM = morning peak hour (between 7:00 and 9:00 AM), PM = evening peak hour (between 4:00 and 6:00 PM), and afternoon peak times which would adequately capture traffic patterns in the neighborhood, including the peak 15-30 minutes of school related AM pick up and PM drop off activities . Please also see Master Response 2. Commend noted and no change is necessary.

Response to Comment F-5

This comment questions whether the driveway would provide sufficient queuing space for drop-off activity during the AM peak period. The commenter notes their belief that the capacity of

the Dunford Avenue driveway would be insufficient to accommodate vehicle queues, which would result in spillover onto Dunford Avenue.

The project would generate an estimated 312 trips during the AM peak period. Based on traffic counts from the Stratford School De Anza campus, 128 trips are estimated to occur during the peak 15 minutes. The proposed site plan accommodates up to 80 cars, including eight spaces for drop-off and 72 spaces for queuing. Therefore, during the peak 15 minutes, 16 groups of eight cars would enter and exit the drop-off area.

Stratford School has proposed to station several staff at the drop-off area to facilitate efficient traffic flow, consistent with its approach at other campuses. Queuing occurs when vehicle volumes exceed available drop-off capacity over a period of time. Assuming each group of eight cars takes 90 seconds to drop-off, it would take 24 minutes to clear the peak 15-minute demand ($\frac{1.5\ Minutes}{8\ Cars}\ x\ 128\ Cars = 24\ Minutes$), resulting in up to nine minutes of queuing during the peak drop-off period. Nine minutes of queuing equates to 77 cars ($\frac{9\ Minutes}{15\ Minutes}\ x\ 128\ cars = 77\ cars$), which is less than the proposed vehicle queue length of 80 vehicles. Nevertheless, predicting vehicle queues is inherently uncertain, and it is possible that queues would occasionally spill over onto Dunford Way. If some queuing does occur on Dunford Way, there is sufficient queuing capacity on the south side of the street where parking would be prohibited. Stratford School would minimize idle times during drop-off to limit queues and would monitor spillover effects along Dunford Way.

Response to Comment F-6

This comment asserts that spillover queues from peak drop-off activity will cause traffic congestion along Dunford Way and Partridge Avenue. The comment suggests that parents will seek out other drop-off locations such as Partridge Avenue and Dunford Way, causing potential conflicts between cars and students crossing the street.

No spillover queues are anticipated on Dunford Way per Response F-5 above, and the project is not anticipated to cause any neighborhood intersections to operate unacceptably as described in Section 3.14 Transportation and Traffic. Stratford School would instruct parents to avoid drop-off along Dunford Way and Partridge Avenue and would station staff to enforce drop-off restrictions along these streets.

Response to Comment F-7

This comment suggests that transportation measures noted in the DEIR (3.14.1a-d) are inadequate to accommodate the circulation impacts associated with the project if a spillover queues.

Because no spillover queues are anticipated on Dunford Way per Response F-5, the mitigation measures outlined in the Draft EIR would be sufficient to address circulation issues at the project site. Comment noted and no change needed.

Response to Comment F-8

This comment states concerns over traffic safety issues in the Birdland neighborhood as it relates to access to Peterson Middle School and Laurelwood Elementary School.

Please see Master Response 2.

Response to Comment F-9

This comment questions whether the project will include adequate parking for school operations. The comment expresses concerns over parents parking in the surrounding streets during school events.

The project's proposed parking supply (81 spaces) exceeds the City of Sunnyvale's code requirement for a school of its size (63 spaces). For occasions when special events occur, a shared parking arrangement may be arranged with neighboring lots. Further, per the Draft EIR, Stratford School would discourage parents from parking in the neighborhood.

Response to Comment F-10

The commenter states that the school is not situated in an area that can safely accommodate a school with 520 students mostly commuting from outside the neighborhood and no mitigation except for busing can ensure their safety.

The comment does not discuss the adequacy of the Draft EIR. Section 3.14 Transportation and Traffic discusses the project area's existing circulation system and the proposed improvements. Please see Master Response 2 for existing conditions and City initiatives to improve those conditions. It is important to note that, as described in Section 2.0 Project Description, Stratford School would enroll a minimum of 51 percent of its students from the City of Sunnyvale. Comment noted.

Response to Comment F-11

The commenter states that the Draft EIR has deeply flawed methodologies and conclusions and has not addressed the air quality impact of the project on an ongoing basis and completely misses on the traffic and safety issues. The commenter concludes by urging the rejection of the project.

The commenter does not identify any specific inadequacies of the EIR. The commenter is referred to the previous responses to comments concerning air quality, traffic, and safety. Further, EIR approval and certification does not constitute project approval. The City of Sunnyvale has power of approval. CEQA does not require the decision-making body to approve or disapprove the project; it only informs the decision-making process.

Letter G

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

RAYNOR PARK

1 message

Lik Roper Wed, Nov 4, 2015 at 12:19 PM
To: mishijima@sunnyvale.ca.gov

I'm now getting involved in the public process of stopping the latest unwanted development and/or changes at Raynor Park (and when i get involved in these kind of things; i can work wonders)...

I'm the person who put out the roughly 10,000 flyers that brought the Full Circle Farm; and I paid for it dearly (http://addendumblog1.blogspot.com/ + see also:www.likroper.com > click on the SUPERBIRDLAND! web page) but they have not broken my spirit as likely planned from all of this targeted police-sponsored harassment and stalking and menacing that I have experienced...I am now pisssed off and ready to push back HARD!

TALKING POINTS FOR THE CITY COUNCIL MEETING:

1) Probably the most important issue here is a burrowing owl that was found in the Raynor Park "kiddie playground" a few years back. Were there any follow ups to protect the birds' habitat at Raynor Park? G-1

2) I heard from a son of of one of the now deceased Corn Palace owners: LIGHT RAIL IS GOING TO BE PUT UP THE MIDDLE OF LAWRENCE EXPRESSWAY FOR APPLE EMPLOYEES!?! yup. You heard it...

3) Ask why they have public hearings when they really have no intention of listening to the people anyway? Public hearings are merely a formality as government usually has NO INTENTION of representing their constituents (unless it's a pot club issue; then you suddenly see NEW HAMPSHIRE-STYLE DEMOCRACY SPREADING ACROSS THE LAND! haha?). G-2

4) There is no number 4 right now; but if i think of one i will tell you. 🙂

RESPONSE TO LETTER G – ROPER

Response to Comment G-1

The commenter asks if there were any measures to protect the burrowing owl's habitat at Raynor Park.

As noted in Appendix E, Biological Resources, suitable habitat for the burrowing owl is not present on the project site or in Raynor Park. Further, during project site visits PMC biologists did not identify any burrowing owl nests or burrowing owls in Raynor Park or the project site. As such no measures are necessary, since neither the species nor habitat to support the species is present at the project site. Comment noted and no change is necessary.

Response to Comment G-2

The commenter states that public hearings are merely a formality as government usually has no intention of representing their constituents.

The commenter does not identify any specific inadequacies of the EIR with this comment. However, as a point of clarification, the EIR process includes numerous steps to provide for public comment. An NOP was circulated on April 20, 2015, to solicit comments on the project. Also, a scoping meeting was held on May 6, 2015, and a Planning Commission hearing on November 9, 2015, to solicit public comments. Comments received during the NOP review period or the scoping meeting were considered and included in the Draft EIR. Additionally, all written comments and oral comments received during the Planning Commission hearing on the Draft EIR are discussed in this Final EIR. Finally, the City will have meetings to review the proposed project.

Letter H

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford school in Sunnyvale

Katie . Wed, Nov 4, 2015 at 2:32 PM
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

Living right on Dunford way just down from the school I'm amazed with how much traffic there already is coming in and out of the neighborhood. I've had to call the police many times regarding cars not stopping for my children while crossing to school at Laurelwood, adding more traffic will be unbearable! I'm concerned already for our safety due to traffic. Please I plead you don't add more!! H-1
Here is a good argument showing the flaw in the outline of Stratford school.

Same as Letter F

1. The traffic analysis in the report seems to assess the traffic situation as simply a capacity issue of having 312 cars driving through two-lane neighborhood roads. The situation is much worse than that because the cars are not just passing through - they are waiting to negotiate their way into the school, with most of the traffic coming within a very short window of time (15-30 minutes), causing major delays on all roads leading to the school. In particular, there is no analysis of how traffic would move along Dunford Way and Partridge Ave during the critical 15-30 minutes before the start of school.
2. As a very rough estimate, assume the driveway on Dunford Way is about 200 ft and the proposed drive aisle on the east side of the project is 500 ft. Assuming an average car length of 13.5 ft plus space between cars of two feet, the capacity of the Dunford driveway is 13 cars and the capacity of the two-lane drive aisle is 64 cars. If each car takes only 10 seconds to pull up to the drop-off area, drop off the child and pull away, it would take 13 minutes just to clear these 77 cars, or about 52 minutes for the 312 projected in-bound trips.
3. So for the good part of an hour, more than 230 cars will be waiting to get into the drop-off loop, choking up traffic on Partridge Ave, Dunford Way through to Wolfe Road and Dunford Way through to Lawrence Expressway. The traffic congestion will be made worse by cars that have left the school on Partridge Ave and want to go back eastward on Dunford Way towards Lawrence Expressway, or westward towards Wolfe Road.
4. Given this scenario, it is not unexpected if cars from the west on Dunford Way will try to turn right from Dunford Way onto Partridge Ave so as to drop off their students on Partridge Ave across the school, creating a hazardous situation for these students as they meet cars traveling north on Partridge Ave after exiting the campus. Likewise, cars coming from the east on Dunford Way can expect long delays waiting to turn left into the Dunford driveway and are likely to be tempted to drop their students off on Dunford Way itself, creating an even more dangerous situation for their students.
5. There is no substantiation that the mitigation measures (MM 3.14.1a-d) would reduce the impact of on-site circulation system to less than significant. In particular, MM3.14.1c is woefully inadequate to deal with the potential hazards listed above.
6. The traffic analysis also does not take into the account the impact of all this additional traffic on the safety of children walking or biking to Peterson Middle School or Laurelwood Elementary School from within the neighborhood.
7. It is also inconceivable that the 81 parking lots would be adequate for the operation of a school of 520 students (Page 3.14-78). Parents will likely have to park in the surrounding streets during school events, depriving neighborhood residents of their street parking.

At the end of the day, Raynor School was built to serve students living in Birdland, not students who commute from elsewhere. Furthermore, Raynor School probably was not built to serve 520 students (or for that matter, 416 students per Alternative 2). The unalterable fact remains that the school is not situated in an area that can safely accommodate a school with 520 students mostly commuting from outside the neighborhood and no mitigation, save for busing all of the students from some central location outside the neighborhood, can ensure their safety.

As discussed above, the Stratford School Draft EIR has deeply flawed methodologies and conclusions. It has not addressed the air quality impact of the project on an ongoing basis and completely misses the traffic and the

safety issues for students and residents during peak drop-off times. A private school serving students commuting from elsewhere cannot be safely accommodated on this site and I strongly urge your rejection of the project.

Sent from my iPhone

RESPONSE TO LETTER H – HADFIELD

Response to Comment H-1

The commenter states that she is amazed of how much traffic there is already coming in and out of the neighborhood and that she has had to call the police numerous times regarding cars not stopping for her children when they are crossing Laurelwood. Safety is a concern.

The commenter does not identify any specific inadequacies of the EIR with this comment. Traffic safety, including pedestrian safety, is discussed in numerous areas of Section 3.14 Transportation and Traffic of the Draft EIR. Please see Master Response 2 regarding existing traffic conditions in the neighborhood.

Comments from a Previous Letter

The commenter provides the same comments as provided by Wee-Lee Lim (Letter F).

The commenter is referred to Response to Comments F-1 through F-11.

Letter I

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford School

Adiba Mudarris Thu, Nov 5, 2015 at 11:57 AM
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

Hi Momoko Ishijima,

I am a resident of Birdland and Stratford School project will impact us in all walks of our life . Traffic , Air pollution will increase and restrict our neighborhood kids form using the park on weekdays and weekend . I-1

I highly disapprove this proposal .

Thanks.

Adiba Mudarris

Confidentiality Notice: This email, including any attachments and files transmitted with it, is intended only for the person or entity to which it is addressed and may contain information that is privileged, confidential or otherwise protected from disclosure. Dissemination, distribution or copying of this email or the information herein by anyone other than the intended recipient, or an employee or agent responsible for delivering the message to the intended recipient, is prohibited. If you have received this email in error, destroy the original message and all copies.

RESPONSE TO LETTER I – MUDARRIS

Response to Comment I-1

The commenter states that the project will impact the neighborhood in all walks of life including traffic, air pollution, and park use.

The commenter does not identify any specific inadequacies of the EIR with this comment. The commenter is referred to the various responses to comments discussing traffic and air quality in this Final EIR, including Master Responses 1 and 2. The commenter is also referred to Section 3.12 Recreation of the Draft EIR which discusses park use. In addition, the commenter is referred to Master Response 2 regarding existing traffic conditions and Master Response 4 discussing the Joint Use Agreement for the park facilities.

Letter J

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Draft EIR - Traffic impact

Deepak Kollipara . . Fri, Nov 6, 2015 at 8:51 AM
To: mishijima@sunnyvale.ca.gov

Hi Momoko,

I am a resident of Birdland Neighbors neighborhood in Sunnyvale and I would like to provide some feedback on the Traffic Impact to our neighborhood for Stratford School - EIR.

1. Traffic in my neighborhood has increased trememdously following the tech industries that have moved into neighborhood. The intersection at Lochinvar and Lawrence for example, is metered at 3 minute interval for signal from Lochnivar towards Lawrence. It used to be that the traffic used to be backed up waiting for signal about 3-6 cars. But now it is getting backed up until Warbler Ave during peak hours. Rise of construction activity (followed by people moving into this neighborhood) along with new businesses moving into this neighborhood has hugely impacted the traffic quality on the streets. J-1

2. If we add more businesses/schools to this neighborhood without planning for additional inlets/outlets, it will be a nightmare for the residents to work their way out of neighborhood for work in the mornings. J-2

3. This community used to be very quite and peaceful. Now a days it is all about the traffic and roadsafety. I have seen many close encounters at the bigger streets (not as big as Lawrence/Homestead) - but arterial streets that connect to the big ones within the residential area in my neighborhood. J-3

I therefore, request you to please re-analyze the traffic impact in this area and help us reside in a peaceful/quite neighborhood.
Thanks for your time.
Regards,
Deepak.

RESPONSE TO LETTER J – KOLLIPARA

Response to Comment J-1

This comment states concerns over traffic congestion in the Birdland neighborhood. The comment highlights the traffic congestion at the intersection of Lawrence Expressway and Lochinvar Avenue, and notes that traffic congestion may worsen due to nearby construction activity.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 1 and Master Response 2. Further, as discussed in Section 3.14 Transportation and Traffic under Impact 3.14.1, project implementation would not result in a deficient LOS for any intersection or roadway sections surrounding the project site.

Response to Comment J-2

The commenter states that if more businesses/schools are added to the neighborhood without planning for additional inlets/outlets, it will be a nightmare for residents to get out of the neighborhood to get to work in the morning.

The commenter does not discuss the adequacy of the EIR. However, traffic circulation is, including the development of new roads or road connections, guided by the goals and policies of the City's General Plan as well as the Citywide Deficiency Plan. The plan addresses existing and anticipated deficiencies in the level of service of the Santa Clara County Congestion Management Program related to those intersections in the city. As discussed in Section 3.14 Transportation and Traffic under Impact 3.14.1, project implementation would not result in a deficient LOS for any intersection or roadway sections surrounding the project site. Please also see Master Response 2 regarding existing traffic conditions in the project area.

Response to Comment J-3

This comment notes the traffic safety issues along neighborhood streets in the Birdland neighborhood.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 2 regarding traffic safety.

Letter K

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Tap's Response to DEIR regarding

Tappan Merric . Sat, Nov 7, 2015 at 5:40 PM
Reply-To: Tappan Merrick
To: City Sunnyvale <council@ci.sunnyvale.ca.us>, "planningcommission@ci.sunnyvale.ca.us" <planningcommission@ci.sunnyvale.ca.us>, "mishijima@ci.sunnyvale.ca.us" <mishijima@ci.sunnyvale.ca.us>
Cc: "birdlandneighbors@yahoo.com" <birdlandneighbors@yahoo.com>, yahoogroups <raynorshine@yahoogroups.com>, yahoogroups <putneighborhoodsfirstinsunnyvale@yahoogroups.com>

Dear Council Members, Planning Commissioners and Planner Ishijima,

I have taken the opportunity to review the Draft Environmental Impact Report (DEIR) for Stratford School's Raynor Park location and wish to offer up my observations, point out some errors in presenting these "facts" and raise some potential CEQUA violations still unaddressed.

But first, allow me to introduce myself. I was a 37 year resident of Birdland (at 1091 Firth Court, Sunnyvale, CA 94087, two blocks east of the Raynor School) and still own this property. I coached at Metro Little League for ten years, with our home field at Raynor Park. Additionally I served on Sunnyvale Pony Baseball's board of directors for five years. I umpired Little League games for five years and refereed Sunnyvale youth soccer and Middle School league games for ten years. I continue to remain active with the Birdland neighborhood and the Save Sunnyvale Parks and Schools organization.

As this is a 507 page document that is poorly organized to address the issues, please allow me to address the issues in a more orderly manner.

First, the two most egregious issues are that none of the "traffic studies" include the new $2 to $3 Billion Apple II Campus, with some 14,500 employees, due to be completed in 2016, and its traffic, only three blocks away, nor the demographics (i.e. where they actually live) of any of the 520 students who will populate the school.

K-1

In Apple's presentations before the Cupertino City Council, they explained that at build out, Apple will host 14,500 employees at this campus. Of those 14,500, 7,250 will be brand new employees to Apple. Apple even estimated where each of these employees will come from (Santa Clara, Sunnyvale, Cupertino, etc.) and how they will get to work (bike, train, car, etc.). True, while their estimates may well be wrong, at least there is some basis for their work. And yet the Stratford DEIR not only doesn't include these estimates in their traffic studies, it specifically states that in these studies that traffic includes current non-project volume and non-project volume plus project (i.e. Stratford) volume traffic. Studies must be re-calculated to, at a minimum, also include Apple's traffic patterns. Likewise, as the development at Lawrence and El Camino has planned for some 475 families and estimated traffic counts for this new development have been available for years, these, too, should be included in future neighborhood traffic studies.

K-2

Second, the Stratford DEIR fails to make any assumptions regarding where their 520 students will

come from. One unstated, yet applied assumption is that all of these students will come from existing Birdland schools. And maybe some of that is true, but Laurelwood School is the second highest rated elementary school in the Santa Clara Unified School District where single family homes tend to cost between $1 and $2 million each. Peterson Middle School has solved its overcrowding by transferring its Alviso students to Don Caljon, and also getting a bump on test scores by over 100 points. Residents buy into our neighborhood because of the existing quality public schools, not to go to private schools. So given that, students will most likely come from outside of Birdland and need to be transported to and from school daily. K-2

As I read through this document, a number of issues came up that I will now address, not in a particular order, but rather as they came to mind.

1. Burrowing owls, ground squirrels and tree bats are frequent visitors to the Raynor Park area and its surrounding park lands (to include Peterson Field, Patrick Henry Field and the Raynor Church field located along Dunford). While burrowing owls are not an endangered species, they are a protected species, limiting construction. Nothing was mentioned regarding any of these visitors. K-3
2. The Raynor School south parking lot frequently floods during the rainy season. Part of this reason is that the storm drain in the middle of the lot does not, nor has it ever drained into any storm sewer. It drains (slowly) into the park land just south of the parking lot. Thus, it actually helps resupply the Raynor well aquafer every winter. No mention of this (either repair or protecting water sources) is mentioned in the DEIR. K-4
3. The new circular driveway planned for the east side of the school property (and probably actually encroaching on City property and all Stratford property) plans to allow for up to 80 cars at a time to drop off and pick up students. **As this driveway is also a fire lane for the school,** no fire trucks would be able to access the school in case of a fire. Also, in light of the fact that children are being dropped off, they may jump out of the car and be struck by another car while trying to get to class on time. The striking car could come from behind, trying to move into the faster lane, or alongside. Emergency vehicles would be unable to pull alongside and either service injured children or drive to the hospital, if required. K-5
4. The DEIR provides for 3 (or maybe 4) alternatives. Could an end result be a combination of up to 520 students during the day AND some 200 adult students for night school? K-6
5. I counted out the number of actual class rooms, and arrived at 22. Calculating school staff would indicate parking needs for Raynor daily would be for 22 teachers, 5 administrative staff (principal, vice principal, secretary and 2 others) and from 22 to 44 class room aides/room parents. Up to 71 school parking spaces would be needed at least some of the time. Many would be for drop off and pick up where each child will be individually walked to his or her class room before returning to retrieve another student. "Staff will carefully escort elementary students to the auditorium or classroom. They will then return to the curb to retrieve the next child." (p 2.0-15) K-7
6. The DEIR has repeatedly referred to a basketball court with bleachers and fencing being built south of the south parking lot on City owned property, yet fails to indicate who will actually pay for this court and amenities, and who will administer the court's use? Shouldn't Stratford incur the cost of this court, fencing and bleachers? K-8
7. What is Stratford's estimated cost to bring these buildings up to current earthquake standards? K-9
8. Does the DEIR greenhouse gas study include 80 car waiting times to drop off and pick up students? If not, why not? K-10
9. The list of buildings in the surrounding area that are subject to pollution issues fails to mention the old Texaco gas station located on Lawrence Expressway and Lochinvar in Santa Clara. K-11
10. There is/was an emergency response storage shed located on the Raynor School campus to house K-12

earthquake emergency supplies. Will there be one in close proximity after build out? If not, then where will it be located and will it then be stocked with appropriate emergency supplies? K-12

11. I am confident that since Stratford failed to include any Apple Campus II information, it also fails to include expected traffic noise from the completed Campus, thus understating any project completed traffic noise. Please correct. K-13
12. The Transportation section of the DEIR makes it sound as if there are all sorts of bus and train routes that will service students at all times of day. Route 328 (down Lawrence) is misleading in that it only runs during the week, only runs north twice a day (arriving at Lawrence and El Camino at 6:52 AM and 8:23 AM, either too early or too late for students to arrive at school on time) and south twice a day (arriving at Lawrence and El Camino at 5:20 PM and 6:29 PM, only suitable to those playing sports after school. Students would have to walk 20 minutes in the elements to arrive at school.
    While Route 26 (down Wolfe) is better in that it runs every half hour, it does not directly connect with CalTrain anywhere on its route, thus requiring an additional transfer and more time spent waiting for another bus. Wolfe Road is 15 minutes away from school. Walking along Marion there are no sidewalks and is muddy in rainy weather. Walking to Wolfe and Inverness takes about 20 minutes, but there are established sidewalks. There are no short cuts available. K-14
    Route 81 (running down Homestead) is better, still as it does connect to the Santa Clara Transit Center (CalTrain) and runs every half hour. It is about a ten minute walk from Stratford down either Quail or Peacock on sidewalks.
    Route 22/522 is the best route, as it runs every 10 minutes or so, and runs all along the El Camino. It doesn't connect to CalTrain until either Palo Alto/Menlo Park, or Santa Clara. At Sunnyvale/Saratoga one could transfer to a 55 bus, but it is probably faster to walk the ten minutes it would take to get to the train station.
    In short, bus and train service are of limited value to Stratford students. Most, if not all will either walk or ride bicycles if not raining and they live close enough (**a BIG IF**), or get rides every day, just like at Laurelwood School.
13. The Stratford DEIR assumes that every child will always take the shortest (as the crow flies) route to and from school. In fact, this will not happen. Those heading towards El Camino will not tend to walk across the Peterson campus before and after school because their walking spots will be mostly vacant and parents will insist that they traverse more crowded walkways. Thus, instead of walking straight across the Peterson Field's west end to Poplar, they will choose to walk down Norman, instead, to El Camino. Norman has no sidewalks. Likewise, students will choose to not walk down Marion for the same reason, but instead snake through Birdland along Partridge, Glenbar, and either Parrot or Oriole to Inverness to Wolfe. My guess is that even if students might otherwise choose to walk where there aren't sidewalks, their parents will insist that they take the longer, and perceived safer sidewalk routes. K-15
14. Cyclists will flood onto Dunford with most students, running right along next to cars, idling, and waiting to pick up children. We already see this at Peterson School (on Bryant) in the afternoon. With so many children coming from outside of Birdland, this will be an even larger hoard of preteen cyclists riding several abreast. Adding to this threat are the cars that will race down the Dunford straightaway at greater than 30 miles an hour. In fact, Dunford is not a straightaway, but curves to the south and drops some 5 feet before reaching Quail, with park plants along the southwest side of the street shielding drivers' sight lines from oncoming cyclists. Farther down Dunford there are several Patrick Henry school driveways (4-2 in and 2 out) that pose a danger to cyclists as well as motorists and pedestrians. The City of Sunnyvale has consistently been slow to heed neighbors warnings regarding broken electric speed signs (9 months or more), installing a three way stop at Quail and Dunford, replacing broken pedestrian crossing signs, or policing for speeders and stop sign runners. Future similar lapses are expected to continue out of the Department of Public Safety and the City's street maintenance department. Similar traffic problems will exist in the morning, but not as drastically as students will be spread out over time. K-16

15. The second, third and fourth paragraphs on page 3.12-3 are in error. Spring practices start as early in the spring as weather allows and teams are selected. In particular, major teams carry over half of their players from the previous season. Their practices will start as soon as possible after registration is completed. Teams will be selected, or filled in, as necessary. By March 1 all teams will begin to practice. Raynor's Little League diamond will be in demand as it meets the 60 foot diamond requirements the teams' need. Practices will occur after school, some beginning as early as 4 PM as my teams did. Once games start (typically the weekend when day light savings' begins in late March, their games are scheduled to start at 5:30 PM to allow at least 90 minutes of playing time until it stays lighter later. Three weeks later they will be able to get in a 2 hour game, and begin to start games at 6 PM. However, Stratford's schedule of use fails to allow for field preparation (chalking the baselines, putting bases out, raking the infield dirt) nor 15 minutes of team warm up each. Stratford must release this diamond by 4:30 PM each weekday to allow for game preparation. K-17
This section fails to address Field 3, which is a backstop and grass infield located just east of the south parking lot. This is where t-ballers first learn to play baseball. T-ball (ages 6 and 7) teams are formed partly based upon what neighborhood the players live in (Ortega, Birdland and Ponderosa). This is done to encourage children to make neighborhood friends, make it easier for parents and players to get to and participate in the League organization (from coaching and snack shack sales, to serving on the Board of Directors), and develop camaraderie. What plans are being made to replace this field?
16. Page 3.12-1 identifies some 818.7 acres of open space facilities owned or maintained by the City for public use. Of this amount, some 98.3% of this land and buildings are located more than one mile away from Bridland and over 90% greater than two miles away from Birdland. Giving up the neighborhood's rights to what amounts to half of Raynor Park fields deprives Birdland neighbors of a right all other Sunnyvale neighborhoods are entitled to, without ever providing the neighborhood an opportunity to vote on this issue. In fact, when brought before the Sunnyvale Council at least 8 times over the past 8 years the neighborhood has turned out with standing room only crowds to oppose selling off or giving away the public's rights to their own fields. The Joint Use Agreement specifically denies the public of use of these fields not only during school time, but after school and on some as yet undefined number of Saturdays and Sundays for the exclusive use of Stratford School for a period of 25 up to 45 years. Doesn't this lie in the face of the Public Parks Act of 1971 and later updated in 1975 and rights protected under both the State Constitution and the Federal civil seizure laws without due process? K-18
17. City Manager Gary Luebbers, during a Council meeting, estimated that it costs the City some $11,000 per acre per year to maintain its parks. The ten acres of Raynor Park being used at least half time by Stratford throughout the year amounts to 5 acres times $11,000, or $55,000. Shouldn't the City bill Stratford for using these fields at least $55,000 per year, or was some sort of corrupt deal worked out giving away city income "under the table?" Over a 45 year period, this amounts to a nearly $2.5 million (in current dollars) illegal kick back to Stratford school. K-19
18. Who is paying for the cost of moving the scoreboard which is unnecessary as it is removed every season after baseball is concluded by Little League volunteers? K-20

Thank you for allowing me the opportunity to respond to these issues. I look forward to a proper response and correcting issues that I and other neighbors have raised in this DEIR process in the Final Environmental Impact Report.

Sincerely,

Tappan (Tap) Merrick
Owner of 1091 Firth Court, Sunnyvale, CA 94087
6202 Cameo Drive, Rocklin, CA 95677

RESPONSE TO LETTER K – MERRICK

Response to Comment K-1

This comment asserts that the DEIR is inadequate because it does not take into account traffic associated with the Apple Campus 2 and Gateway Village project.

Please see Master Response 1.

Response to Comment K-2

This comment asserts that the DEIR fails to make assumptions regarding the home locations of students for the proposed project. The comment states that the DEIR assumes that all students will come from existing Birdland schools, and suggests this assumption is incorrect because most students will come from outside the Birdland neighborhood.

The Draft EIR analyzes trip distribution based on a map of the anticipated home locations of Stratford School students provided by the applicant, locations of employment areas, prevailing travel patterns, and recent TIAs completed in the area. Input from the City of Sunnyvale staff was used to refine the trip distribution patterns. The Draft EIR estimates that 98 percent of students would reside outside of the Birdland neighborhood, with a minimum of 51 percent of students coming from within the City of Sunnyvale.

Response to Comment K-3

The commenter states that burrowing owls, ground squirrels, and tree bats are frequent visitors to the Raynor Park area and surrounding parks lands. Nothing was mentioned regarding these visitors.

As discussed in Section 3.3 Biological Resources of the Draft EIR, a reconnaissance-level field survey was conducted to collect site-specific data regarding habitat suitability for special-status species and to identify potential jurisdictional waters. Additional information was obtained from a variety of outside data sources and can be found in the reference list of the Draft EIR. Additionally, preliminary database searches were performed on the websites established by the US Fish and Wildlife Service (USFWS) Information, Planning, and Conservation (IPaC) System, the USFWS Critical Habitat Portal, the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) and the California Native Plant Society's (CNPS) Inventory of Rare, Threatened, and Endangered Plants of California to identify special-status species with the potential to occur in the area. A search of the USFWS's IPaC System and Critical Habitat Portal was performed to identify federally protected species and their habitats that may be affected by the project. In addition, a query of the CNDDB was conducted for the Cupertino, California, US Geological Survey (USGS) 7.5-minute quadrangle (quad) and all adjacent quads (Los Gatos, San Jose West, Milpitas, Palo Alto, Castle Rock Ridge, Big Basin, Mountain View, and Mindego Hill) to identify known processed and unprocessed occurrences for special-status species. Lastly, the CNPS database was queried to identify special-status plant species with the potential to occur within the aforementioned quads.

The Draft EIR identified the burrowing owl as a special-status species occurring within close proximity of the project site. As such, the Draft EIR provided mitigation measure **MM 3.3.1,** which requires preconstruction surveys by a qualified biologist to determine if the proposed

construction will disturb nesting birds. If active nest(s) are identified during the preconstruction survey, mitigation is required to protect the birds.

Species that are not listed in the Federal Endangered Species Act, the Migratory Bird Treaty Act, California Endangered Species Act, California Plant and Fish Code, or the Santa Clara Valley Habitat Plan, such as the ground squirrel, are not required to be protected and therefore not discussed in the Draft EIR.

Response to Comment K-4

The commenter states that the Draft EIR does not mention that the storm drain in the south parking lot of the project site flows into the park.

Section 3.8 Hydrology and Water Quality of the Draft EIR (p. 3.8-2) discusses the stormwater drainage system of the project site stating that:

> "Surface water runoff on the project site flows via the paved surfaces, parking lots, and play areas near the school to nearby surface storm drain inlets or infiltrates through the unpaved grass or landscaped areas."

Impact 3.8.3 discusses the impacts resulting from an alteration in drainage at the project site. Improvements would enhance site drainage conditions by formalizing drainage paths and updating parking lot pavements and site landscaping. Improvement to site drainages would prevent localized flooding, which occurs occasionally in the south parking lot under current conditions.

Response to Comment K-5

The commenter states that because the new circular driveway would be used to drop off and pick up students, no fire trucks or emergency vehicles would be able to access the school in case of a fire or injury.

The project is required to comply with the City of Sunnyvale Public Safety Fire Services Bureau standards for fire protection including site access. Site access and drop-off/pick-up activities are discussed in Section 3.14 Transportation and Traffic under Impact 3.14-1**.** The Draft EIR includes a number of mitigation measures (**MM 3.14.1a** through **MM 3.14.1d**) to improve site safety during drop-off/pick-up activities. Incorporation of these mitigation measures would reduce potential safety impacts to less than significant. Further, the City of Sunnyvale fire prevention unit confirmed that in case of an emergency, vehicles would be evacuated as needed to obtain access.

Response to Comment K-6

The commenter asks if the end result could be a combination of up to 520 students during the day and 200 adult students during the night.

The commenter does not discuss the adequacy of the EIR. The Draft EIR analyzes the proposed project as well as Alternative 3 Adult School. Alternative 3 was included in the Draft EIR as a possible alternative to assess the potential for environmental impacts and provide the City with alternatives to the project. No plans have been submitted for Alternative 3. The combination of

the project and Alternative 3 is not considered a viable option in the Draft EIR because it would result in an increase in impacts greater than the proposed project. CEQA Guidelines Section 15126.6 discusses alternative choices stating that:

> "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

A combination of both a day school and night school would require further environmental analysis.

Response to Comment K-7

The commenter discusses the potential parking need for the school and determines that up to 71 school parking spaces will be needed.

The commenter does not discuss the adequacy of the EIR. Parking is discussed in Section 3.14 Transportation and Traffic and determines that the existing parking supply exceeds City parking requirements and should be sufficient under the middle school-only scenario to accommodate parking needs. If the school enrolls a mix of age groups, like preschool, parking would need to be adjusted and some parking may occur on local streets if not otherwise discouraged. This impact would be significant, and mitigation measure **MM 3.14.1c** would be required. Implementation of mitigation measure **MM 3.14.1c** would reduce potential parking impacts to less than significant.

Response to Comment K-8

The commenter states that the Draft EIR fails to indicate who will pay for the new basketball court, fencing, and bleachers.

The commenter does not discuss the adequacy of the EIR. The cost of proposed facilities or how they will be funded is not an impact on the physical environment and therefore not a CEQA issue.

Response to Comment K-9

The commenter asks what the estimated cost to bring the school buildings up to current earthquake standards.

The commenter does not discuss the adequacy of the EIR. The monetary cost of constructing a project is not a CEQA issue and therefore not analyzed in the Draft EIR. It is important to note that the buildings are considered to be up to seismic standard, as outlined in Section 3.5 Geology and Soils.

Response to Comment K-10

The commenter asks if the 80-car waiting times for drop-off and pick-up was included in the greenhouse gas analysis.

The Draft EIR includes greenhouse gas (GHG) emissions from mobile sources as a part of the GHG analysis. The Draft EIR does not include the actual waiting times for cars during drop-off and pickup as this cannot be adequately quantified using the CalEEMod software. CalEEMod is the state-recognized software for determining air quality impacts. However, the GHG analysis uses emissions from 1,139 average daily vehicle trips and the BAAQMCD's GHG thresholds to determine if the project would have a GHG impact. See Draft EIR Section 3.2 Air Quality for more details.

Response to Comment K-11

The commenter states that the old Texaco gas station on Lawrence Expressway and Lochinvar Avenue is not on the list of buildings subject to pollution issues.

The commenter does not identify what list he is referring to in his comment. It is assumed in this response that the commenter is referring to Table 3.7-1 Known Hazardous Contamination Sites Within 1 Mile Of Project Site of the Draft EIR. The old Texaco gas station is identified as the "Gas and Shop" site in the EnviroStor and GeoTracker databases and therefore identified by this name in Table 3.7-1. The leaking underground storage tank (LUST) case for this site has been closed and cleanup complete since 1995.

Response to Comment K-12

The commenter states that there is an emergency response storage shed located on the Raynor campus and then asks if there will be one in close proximity after buildout or where it will be located and if it will be appropriately stocked with emergency supplies.

The commenter does not discuss the adequacy of the EIR. The relocation of the storage shed located in Raynor Park would be undertaken by the City of Sunnyvale under a separate action, which is not part of the proposed project.

Response to Comment K-13

The commenter states his confidence that the Apple Campus 2 was not included in the traffic noise analysis and therefore traffic noise is understated.

The traffic noise analysis uses the local traffic counts identified in the TIA as one criterion to determine traffic noise. This information was used for both existing and cumulative traffic noise. The TIA, which is included as Appendix I in the Draft EIR, includes the Apple Campus 2 project as a part of the cumulative traffic analysis (see Appendix E of the TIA), and as such, traffic identified as a part of the Apple Campus 2 project is included as a part of the cumulative noise analysis.

Response to Comment K-14

This comment states that bus and train service near the project site is of limited use to Stratford students. It notes that VTA routes 328, 26, 81, and 22/522 are too distant or too infrequent to serve Stratford students.

As a conservative measure, the Draft EIR assumes limited usage of public transit by Stratford School students, with the majority being driven to the project site.

Response to Comment K-15

This comment states concerns over pedestrian safety in the Birdland neighborhood.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 2.

Response to Comment K-16

This comment expresses concerns over traffic safety in the Birdland neighborhood along Dunford Way.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 2.

Response to Comment K-17

The commenter states that the 2nd, 3rd and 4th paragraphs on page 3.12-3, which refers to sports field use by the Sunnyvale Metro Little League and American Youth Soccer Organization, are in error regarding time of use and that by March 1, teams start practice and will need the baseball diamond. The commenter continues and identifies the time frame that the fields are needed by the Little League prior to games. The commenter states that Stratford must release the baseball diamonds by 4:30 to allow for game preparation. Finally, the commenter states that the Draft EIR fails to address Field 3, used as a T-ball field, which is just east of the south parking lot and asks what plans are being made to replace this field.

The time of use for baseball games for the Little League were established using the game times listed on the Little League website. As stated in Section 3.12 Recreation under Impact 3.12-1, Stratford School would have priority use of a portion of Raynor Park on school days for Area 1 (baseball diamond) from 9:00 AM to 3:00 PM. Area 2 (proposed basketball court) priority hours would be from 9:00 AM to 5:30 PM on regular school days. The Stratford School's after-hours uses are from 4:00 PM to 5:30 PM on Wednesdays and Thursdays, and 4:00 PM to 6:00 PM on Fridays during the months of February through May, and 4:00 PM to 5:00 PM on Thursdays and 4:00 PM to 6:00 PM on Fridays during the months of September through November.

After-school priority use hours by Stratford have been limited to avoid conflicts with existing user groups as much as possible. Schedule coordination with current athletic users and Stratford would lessen the displacement of sports teams, and would not cause increased usage of regional or other facilities that would lead to substantial degradation of those facilities.

The Draft EIR looks at impacts of the whole park, which would include Field 3, as defined by the commenter. Although some changes would take place to Field 3, as described in Section 2.0 Project Description of the Draft EIR, these changes would not require the replacement of Field 3.

Comment noted and no changes necessary.

Response to Comment K-18

The commenter provides background information on the Birdland neighborhood's opposition to selling or giving away rights to their own fields and asks if allowing the proposed project exclusive rights to park facilities is not civil seizure without due process.

The commenter does not discuss the adequacy of the EIR. The commenter is referred to Master Response 4 discussing the Joint Use Agreement for the park facilities.

Response to Comment K-19

The commenter states that since the proposed project will use half of the park facilities, shouldn't the City bill the project for the use of the facilities.

The commenter does not discuss the adequacy of the EIR. Financial reimbursement or payments are not an impact on physical environment and therefore not a CEQA issue. The commenter is referred to Master Response 4 discussing the Joint Use Agreement for the park facilities.

Response to Comment K-20

The commenter asks who is paying for the cost to move the scoreboard.

The commenter does not discuss the adequacy of the EIR. The cost of moving a scoreboard is not an impact on the physical environment and therefore it is not considered a CEQA issue.

Letter L

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford DEIR

Nabeel Ibrahim . . Sat, Nov 7, 2015 at 9:38 PM
Reply-To:
To: mishijima@sunnyvale.ca.gov, council@sunnyvale.ca.gov

Dear Council and City Staff,

Many of my neighbors have provided feedback and I include the message from Wee-Lee below which summarizes key questions regarding the DEIR.

In addition, the traffic analysis seems to be incomplete, and does not appear to include 2 key components:

1. **Traffic from all proposed developments in the surrounding area.** Note: Page 3.14-40 of the DEIR states that: "TIA Appendix F contains a full list of approved and not occupied projects". In fact, the TIA (Appendix I) states that the approved projects are included in the TIA Appendix E, not F. Furthermore, the TIA (Appendix I) available on the Dropbox site does not include any appendices. In short, from the available information on the website, it is impossible to determine which proposed projects are included in the traffic analysis. At the very least, the Apple 2 campus, Butcher's Corner, and Gateway Village Santa Clara must be included. L-1
2. **Additional cut-through traffic due to the use of Waze, Google Maps, Apple Maps, etc.** These apps (and many others) direct users through neighborhoods to avoid slow intersections. With the number of intersections that have very poor LOS grades--and with the intersections projected to become even worse--these apps will increasingly direct more traffic through the Birdland area. This is not conjecture; this is happening now as any user of these apps can confirm. Clearly, with reduced levels of service at intersections around Birdland (especially Wolfe/Homestead and Wolfe/El Camino), the increase of traffic routed through Birdland must be included in any competent traffic analysis. L-2

Thank you for consideration of my comments and those of my neighbors.

Sincerely,
Nabeel Ibrahim, Ph.D.

---------- Forwarded message ---------- Same as Letter F

Dear honorable members of the Sunnyvale City Council,

I am writing to highlight several deep flaws in the Stratford School Draft EIR and urge your rejection of the report.

A. Air quality impact

1. Table 3.2-3 (Page 3.2-5) shows that our area is already in violation of federal and/or state air quality standards for ozone, coarse particulate matter and fine particulate matter. An air quality impact is considered significant if among other things, the project would (i) violate any air quality standard or (ii) contribute significantly to an existing or projected air quality violation. Yet, the project is deemed not to have a significant impact on air quality on the basis of BAAQMD significance thresholds (Table 3.2-6) without converting the estimated emissions (pounds/day) into the air

quality standards of Table 3.2-4 (ppm) to determine if the project actually causes a violation in additional air quality standards. Clearly, the project will already exacerbate the existing violations for ozone, coarse and fine particulate matter, but the report dismisses the effects by stating "the correlation between a project's emissions and increases in nonattainment days, or frequency or severity of related illnesses, cannot be accurately quantified" (Page 3.2-18) and blithely concludes that the project's impact is less than significant. The cumulative effect of the project's emissions on the existing air quality of this area needs to be determined, rather than comparing project contributions relative to a significance threshold.

2. BAAQMD Regulation 14 (Page 3.2-10) requires measures to reduce emissions of air pollutants from mobile sources by reducing motor vehicle use and/or promoting use of clean fuels and low-emission vehicles. The report fails to quantify the project's impact on air quality measures and provides no measures to comply with Regulation 14.
3. The report also claims that the project will not contribute to localized concentrations of mobile-source carbon monoxide that would exceed applicable ambient air quality standards (Page 3.2-20), the standard being increasing traffic volumes at affected intersections to more than 44,000 vehicles per hour. If you consider that the Levi stadium has just over 30,000 parking lots, even the stadium will not create a situation of more than 44,000 vehicles per hour! We need to take into account the context of the project and this threshold of 44,000 vehicles per hour is clearly not the correct standard to use to determine the project's impact on carbon monoxide emissions in a ***residential area with a park where many young children congregate and play***. Instead, the report needs to determine the air quality impact in ppm of carbon monoxide from the additional vehicle trips and determine if it leads to a violation of the standards listed in Table 3.2-4.

B. Traffic

1. The traffic analysis in the report seems to assess the traffic situation as simply a capacity issue of having 312 cars driving through two-lane neighborhood roads. The situation is much worse than that because the cars are not just passing through - they are waiting to negotiate their way into the school, with most of the traffic coming within a very short window of time (15-30 minutes), causing major delays on all roads leading to the school. In particular, there is no analysis of how traffic would move along Dunford Way and Partridge Ave during the critical 15-30 minutes before the start of school.
2. As a very rough estimate, assume the driveway on Dunford Way is about 200 ft and the proposed drive aisle on the east side of the project is 500 ft. Assuming an average car length of 13.5 ft plus space between cars of two feet, the capacity of the Dunford driveway is 13 cars and the capacity of the two-lane drive aisle is 64 cars. If each car takes only 10 seconds to pull up to the drop-off area, drop off the child and pull away, it would take 13 minutes just to clear these 77 cars, or about 52 minutes for the 312 projected in-bound trips.
3. So for the good part of an hour, more than 230 cars will be waiting to get into the drop-off loop, choking up traffic on Partridge Ave, Dunford Way through to Wolfe Road and Dunford Way through to Lawrence Expressway. The traffic congestion will be made worse by cars that have left the school on Partridge Ave and want to go back eastward on Dunford Way towards Lawrence Expressway, or westward towards Wolfe Road.
4. Given this scenario, it is not unexpected if cars from the west on Dunford Way will try

to turn right from Dunford Way onto Partridge Ave so as to drop off their students on Partridge Ave across the school, creating a hazardous situation for these students as they meet cars traveling north on Partridge Ave after exiting the campus. Likewise, cars coming from the east on Dunford Way can expect long delays waiting to turn left into the Dunford driveway and are likely to be tempted to drop their students off on Dunford Way itself, creating an even more dangerous situation for their students.

5. There is no substantiation that the mitigation measures (MM 3.14.1a-d) would reduce the impact of on-site circulation system to less than significant. In particular, MM3.14.1c is woefully inadequate to deal with the potential hazards listed above.
6. The traffic analysis also does not take into the account the impact of all this additional traffic on the safety of children walking or biking to Peterson Middle School or Laurelwood Elementary School from within the neighborhood.
7. It is also inconceivable that the 81 parking lots would be adequate for the operation of a school of 520 students (Page 3.14-78). Parents will likely have to park in the surrounding streets during school events, depriving neighborhood residents of their street parking.

At the end of the day, Raynor School was built to serve students living in Birdland, not students who commute from elsewhere. Furthermore, Raynor School probably was not built to serve 520 students (or for that matter, 416 students per Alternative 2). The unalterable fact remains that the school is not situated in an area that can safely accommodate a school with 520 students mostly commuting from outside the neighborhood and no mitigation, save for busing all of the students from some central location outside the neighborhood, can ensure their safety.

As discussed above, the Stratford School Draft EIR has deeply flawed methodologies and conclusions. It has not addressed the air quality impact of the project on an ongoing basis and completely misses the traffic and the safety issues for students and residents during peak drop-off times. A private school serving students commuting from elsewhere cannot be safely accommodated on this site and I strongly urge your rejection of the project.

Thank you for your consideration.

Posted by: W L .

Reply via web post • Reply to sender • Reply to group • Start a New Topic • Messages in this topic (1)

VISIT YOUR GROUP

YAHOO! GROUPS

• Privacy • Unsubscribe • Terms of Use

RESPONSE TO LETTER L – IBRAHIM

Response to Comment L-1

This comment questions if the Draft EIR includes the Apple Campus 2, Butcher's Corner, Gateway Village, and other nearby projects.

Please see Master Response 1.

Response to Comment L-2

This comment expresses concerns over cut-through traffic in the Birdland neighborhood.

Please see Master Response 1.

Comments from a Previous Letter

The commenter provides the same comments as provided by Wee-Lee Lim (Letter F).

The commenter is referred to Response to Comments F-1 through F-11.

Letter M

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Feedback on Draft EIR

Preeti Sharma . Sat, Nov 7, 2015 at 10:54 PM
Reply-To: Preeti Sharma .
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>
Cc: "council@sunnyvale.ca.gov" <council@sunnyvale.ca.gov>

I would like to express my disappointment at how lacking I found the DEIR. I think there is not enough information on crucial deciding factors.

1. The project is in a residential neighborhood that has 4 other schools within a block :

    1. Appleseed Montessori
    2. Silicon Valley Academy (K - High school)
    3. New concept Chinese school (preshcool)
    4. Laurelwood elementary. (K - 5)

    What are the current enrollments and maximum allowed at these schools.

M-1

2. What are the thresholds these streets can take. Parts of Quail and Lochinvar are residential streets. What are the results of the study the city has done on these streets and how does that compare with the maximum threshold on these streets. Similarly thresholds for Swallow , Inverness and Dunford are not defined . I am certain these streets were planned for a certain amount of traffic. What % of that maximum defined traffic have we already reached.
Also traffic patterns during school hours are worse than the rest of the day so averages donot tell the whole story.

M-2

Please check out these videos taken of the neighborhood:
Sunnyvale Traffic: Birdland Neighborhood
Sunnyvale Traffic: Birdland Neighborhood: Lochinvar
Sunnyvale Traffic: Birdland Neighborhood: Inverness

Sunnyvale Traffic: Birdland Neighborhood: Inverness

View on **www.youtube.com** Preview by Yahoo

Sunnyvale Traffic: Birdland Neighborhood: Lochinvar

View on **www.youtube.com** Preview by Yahoo

Sunnyvale Traffic: Birdland Neighborhood

View on **www.youtube.com** Preview by Yahoo

3. What is the maximum enrollment cap allowed by the city for the Stratford based upon various considerations. The maximum allowed capacity of the location seems twice of what Stratford is proposing right now. What will stop them from enrolling more than 500 students. M-3

4. Do not see any mention indicator species currently at the location and how they may be affected. M-4

Thank you for your time.

Regards.

Preeti.

RESPONSE TO LETTER M – SHARMA

Response to Comment M-1

The commenter asks the enrollment of the four other schools within the area.

The commenter does not discuss the adequacy of the EIR. Since the project would construct a school it would not impact public schools in the City of Sunnyvale. CEQA Guidelines Section 15128 states:

> "An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR."

Draft EIR Section 3.11 Public Services identifies that because that the project proposes to operate a school facility in the city, it would not increase demand for public school services or require the construction of new or expanded school facilities elsewhere in Sunnyvale. Therefore, the project would have no impact on schools and this issue is not further discussed.

Response to Comment M-2

This comment questions the street capacity within the Birdland neighborhood along streets such as Quail Avenue, Lochinvar Avenue, Dunford Way, Swallow Drive, and Inverness Way. The comment notes that traffic during school hours is worse than the rest of the day.

The commenter is correct that during pick up and drop off activities the project area is more congested than at other times. Traffic counts were taken during those times to adequately reflect project impacts on neighborhood traffic. Please see Master Response 2 for traffic measurements and street capacity findings.

Response to Comment M-3

The commenter asks the enrollment capacity allowed by the City for Stratford School. The commenter states that the maximum allowed capacity seems to be twice that of what the proposed project is proposing and what will stop them from enrolling more than 500 students.

An EIR is required to analyze a project as is proposed. In this case, the maximum student enrollment analyzed is 520 students, as stated in Section 2.0 Project Description. Therefore, the environmental analysis is based on this maximum enrollment.

Response to Comment M-4

The commenter states that there was no mention of indicator species in the location and how they would be affected.

The biological analysis, as discussed in Draft EIR Section 3.3 Biological Resources, is based on special-status species identified in the following databases: USFWS IPaC System, the USFWS's Critical Habitat Portal, CDFW's CNDDB, and the CNPS Inventory of Rare, Threatened, and Endangered Plants of California. Using these databases along with field surveys and review of published biological information is standard practice for identifying impacts on biological resources. If an indicator species is considered a special-status species in the aforementioned databases, then this species will be identified as a part of the biological analysis.

Letter M2

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Indicator speciies in the city of Sunnyvale

Preeti Sharma Mon, Nov 9, 2015 at 8:13 AM
Reply-To: Preeti Sharma .
To: Momoko Ishijima <mishijima@sunnyvale.ca.gov>, PlanningCommission@sunnyvale.ca.gov

Hello Mokoma,

I did not find in the study the current set of indicator species we have at the site. As I walk each morning I hear a of birds and a variety of them around the building and at the park. How would that wildlife be affected due to pollution, noise and cutting of trees ? M-2.1

Thanks

Preeti.

RESPONSE TO LETTER M2 – SHARMA

Response to Comment M2-1

The commenter asks how the wildlife would be affected due to pollution, noise, and cutting of trees.

For CEQA impact analysis, impacts on special-status species, riparian habitats, or other sensitive natural communities identified in local or regional plans, wetlands, the movement of migratory fish or wildlife, or conflicts with an adopted habitat conservation plan or natural community conservation plan require mitigation to reduce the impacts to less than significant. As discussed in Draft EIR Section 3.3 Biological Resources, the project would result in impacts on migratory or nesting birds and as such mitigation measures are required. Mitigation measure **MM 3.3.1** would reduce impacts on these birds to less than significant.

Letter M3

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Inputs: Draft EIR for Stratford school

Preeti Sharma Mon, Nov 9, 2015 at 4:34 PM
Reply-To: Preeti Sharma .
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

I would also like to add the following to my previous inputs:

1. I do not see details of how many Stratford students are expected to commute via bicycle or public transport. How many currently do at their current locations ? I understand it is less than 1% currently at some of their locations. M3-1

2. There is a beeline route from Stratford elementary on Lochinvar to this proposed location. Traffic is expected to increase on Lochinvar/Inverness/Dunford/Quail due to parents commuting between these locations. This is not mentioned anywhere. M3-2

3. Have inputs been taken from the EIR for the Apple project esp pertaining to traffic ? M3-3

RESPONSE TO LETTER M3 – SHARMA

Response to Comment M3-1

This comment questions how many students will arrive via bicycling or transit.

The Draft EIR does not quantify trips by other modes as these trips would not impact any of the City's transportation impact criteria. Further, to provide for a conservative estimate, the project traffic impact assessment is based on the assumption that the majority of students would arrive via car. Comment noted and no changes made.

Response to Comment M3-2

This comment questions how many trips will be made between the Stratford elementary school at the intersection of Pomeroy Avenue and Brookdale Drive and the project site.

The Draft EIR analyzes these schools independently as the project may also include an elementary school, so trips between the schools were assumed to be minimal.

Response to Comment M3-3

This comment questions if the Draft EIR considers the Apple Campus 2.

Please see Master Response 1.

Letter M4

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Response to Stratford School EIR for Raynor Park location

Preeti Sharma . Wed, Nov 11, 2015 at 8:39 AM
Reply-To: Preeti Sharma .
To: Shomir Dighe < , "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>, "PlanningCommission@sunnyvale.ca.gov" <PlanningCommission@sunnyvale.ca.gov>, "council@sunnyvale.ca.gov" <council@sunnyvale.ca.gov>
Cc: BirdlandNeighbors <birdlandneighbors@yahoogroups.com>, Raynor Park Neighborhood Association <raynorshine@yahoogroups.com>

Thanks Shomir for your inputs . I agree Wee Lee has his comments logically compiled and backed up .Thanks Wee Lee , really appreciate your effort.

While a lot has be said on the issue I noticed the number of schools within a couple blocks of the proposed location :

I realized there are the following schools are in the area currently:

1. Appleseed Montessori
2. Silicon Valley Academy (K - High school)
3. New concept Chinese school (preshcool)
4. Laurelwood elementary. (K - 5)
5. Dynasty Academy (aftercare)

M4-1

We do not know the maximum enrollment allowed for each of these schools. I have put that in my EIR response. We also do not know the maximum enrollment allowed for Stratford as Denise pointed out. So we do not know what we are planning for .

Thanks.

Preeti.

Same as Letter F

On Tuesday, November 10, 2015 11:50 PM, Shomir Dighe . wrote:

Dear members of the Sunnyvale City Council,

I am writing to highlight several deep flaws in the Stratford School Draft EIR and urge your rejection of the report. I live on Inverness Way and we are already experiencing heavier traffic from cars cutting through, wanting to avoid the Wolf Homestead intersection. I am echoing similar concerns about this project that have been expressed so eloquently, by my Birdland neighbor Wee Lee. In particular:

A. Air quality impact -Section 3.2

1. Table 3.2-3 (Page 3.2-5) shows that our area is already in violation of federal and/or state air quality standards for ozone, coarse particulate matter and fine particulate matter. An air quality impact is considered significant if among other things, the project would (i) violate any air quality standard or (ii) contribute significantly to an existing or projected air quality violation. Yet, the project is deemed not to have a significant impact on air quality on the basis of BAAQMD significance thresholds (Table 3.2-6) without converting the estimated emissions (pounds/day) into the air quality standards of Table 3.2-4 (ppm) to determine if the project actually causes a violation in additional air quality standards. Clearly, the project will already exacerbate

the existing violations for ozone, coarse and fine particulate matter, but the report dismisses the effects by stating "the correlation between a project's emissions and increases in nonattainment days, or frequency or severity of related illnesses, cannot be accurately quantified" (Page 3.2-18) and blithely concludes that the project's impact is less than significant. The cumulative effect of the project's emissions on the existing air quality of this area needs to be determined, rather than comparing project contributions relative to a significance threshold.

2. BAAQMD Regulation 14 (Page 3.2-10) requires measures to reduce emissions of air pollutants from mobile sources by reducing motor vehicle use and/or promoting use of clean fuels and low-emission vehicles. The report fails to quantify the project's impact on air quality measures and provides no measures to comply with Regulation 14.
3. The report also claims that the project will not contribute to localized concentrations of mobile-source carbon monoxide that would exceed applicable ambient air quality standards (Page 3.2-20), the standard being increasing traffic volumes at affected intersections to more than 44,000 vehicles per hour. If you consider that the Levi stadium has just over 30,000 parking lots, even the stadium will not create a situation of more than 44,000 vehicles per hour! We need to take into account the context of the project and this threshold of 44,000 vehicles per hour is clearly not the correct standard to use to determine the project's impact on carbon monoxide emissions in a *residential area with a park where many young children congregate and play.* Instead, the report needs to determine the air quality impact in ppm of carbon monoxide from the additional vehicle trips and determine if it leads to a violation of the standards listed in Table 3.2-4.

B. Traffic -Section 3.14

1. The traffic analysis in the report seems to assess the traffic situation as simply a capacity issue of having 312 cars driving through two-lane neighborhood roads. The situation is much worse than that because the cars are not just passing through - they are waiting to negotiate their way into the school, with most of the traffic coming within a very short window of time (15-30 minutes), causing major delays on all roads leading to the school. In particular, there is no analysis of how traffic would move along Dunford Way and Partridge Ave during the critical 15-30 minutes before the start of school.
2. As a very rough estimate, assume the driveway on Dunford Way is about 200 ft and the proposed drive aisle on the east side of the project is 500 ft. Assuming an average car length of 13.5 ft plus space between cars of two feet, the capacity of the Dunford driveway is 13 cars and the capacity of the two-lane drive aisle is 64 cars. If each car takes only 10 seconds to pull up to the drop-off area, drop off the child and pull away, it would take 13 minutes just to clear these 77 cars, or about 52 minutes for the 312 projected in-bound trips.
3. So for the good part of an hour, more than 230 cars will be waiting to get into the drop-off loop, choking up traffic on Partridge Ave, Dunford Way through to Wolfe Road and Dunford Way through to Lawrence Expressway. The traffic congestion will be made worse by cars that have left the school on Partridge Ave and want to go back eastward on Dunford Way towards Lawrence Expressway, or westward towards Wolfe Road.
4. Given this scenario, it is not unexpected if cars from the west on Dunford Way will try to turn right from Dunford Way onto Partridge Ave so as to drop off their students on Partridge Ave across the school, creating a hazardous situation for these students as they meet cars traveling north on Partridge Ave after exiting the campus. Likewise, cars coming from the east on Dunford Way can expect long delays waiting to turn left into the Dunford driveway and are likely to be tempted to drop their students off on Dunford Way itself, creating an even more dangerous situation for their students.
5. There is no substantiation that the mitigation measures (MM 3.14.1a-d) would reduce the impact of on-site circulation system to less than significant. In particular, MM3.14.1c is woefully inadequate to deal with the potential hazards listed above.
6. The traffic analysis also does not take into the account the impact of all this additional traffic on the safety of children walking or biking to Peterson Middle School or

Laurelwood Elementary School from within the neighborhood.

7. It is also inconceivable that the 81 parking lots would be adequate for the operation of a school of 520 students (Page 3.14-78). Parents will likely have to park in the surrounding streets during school events, depriving neighborhood residents of their street parking.

C. Noise -Section 3.10

1. Traffic-It is inconceivable that the additional 312 cars during peak times (in a 15-20 minutes window) would only increase the noise levels by .1 dba on neighborhood streets as suggested by table 3.10-4 and that the impact would be 'less than significant'.
2. Extracurricular Activities. Section 3.10.2. Even during peak youth activities, we have never had anywhere close to this influx of 520 kids that will be converging on the field during lunch breaks on a daily basis and on special events. That noise level is not 'insignificant 'as suggested by the report.

D. Recreation -Section 3.12- Playing field and Basketball Court

1. Priority access for 20 years to the public funded playing field during school hours, at the expense of residents is a concern especially as Stratford has a year round program.
2. Building a basketball court on public ground without any inputs from neighbors who have to put up with the noise and the crowd it attracts, is also a concern.

At the end of the day, Raynor School was built to serve students living in Birdland, not students who commute from elsewhere. Furthermore, Raynor School probably was not built to serve 520 students (or for that matter, 416 students per Alternative 2). The unalterable fact remains that the school is not situated in an area that can safely accommodate a school with 520 students mostly commuting from outside the neighborhood and no mitigation, save for busing all of the students from some central location outside the neighborhood, can ensure their safety. But wait, Apple is already doing that, so now, are we proposing to add more buses on Wolf?

As discussed above, the Stratford School Draft EIR has deeply flawed methodologies and conclusions. It has not addressed the noise and air quality impact of the project on an ongoing basis and completely misses the traffic and the safety issues for students and residents during peak drop-off times. A private school serving students commuting from elsewhere cannot be safely accommodated on this site and I strongly urge your rejection of the project.

Thank you for your consideration.

Shomir Dighe

RESPONSE TO LETTER M4 – SHARMA

Response to Comment M4-1

The commenter provides a list of schools in the area and states that she does not know the maximum enrollment for these schools. Additionally, the commenter states that she does not know the maximum enrollment for the proposed project.

The commenter is referred to Response to Comments M-1 and P2-4 regarding school enrollment.

Comments from a Previous Letter

The commenter provides the same comments as provided by Wee-Lee Lim (Letter F).

The commenter is referred to Response to Comments F-1 through F-11.

Letter M5

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford DEIR input

Preeti Sharma Wed, Nov 11, 2015 at 8:55 AM
Reply-To: Preeti Sharma .
To: Momoko Ishijima <mishijima@sunnyvale.ca.gov>, PlanningCommission AP <planningcommission@sunnyvale.ca.gov>

I would first like to apologize since this is my third email input but I can make this my last .

The school will not have minimum impact on the neighborhood "environment" particularly when we take into consideration any other option that did not include the use of fields.

Even if say some other schools had similar priority usage provided , this particular school has its holidays /vacations least aligned with the public school system. So 3-4 times in a year we would have a situation where kids in the neighborhood are free and can use the fields but Stratford is in session.

Kids and parents have the capability to walk ot the neighborhood park and enjoy the open spaces during vacations but that will be taken away during the follwoing times of the year:

1. Fall break.
2. Winter break.
4. Spring break.
5. Summer break.

Please look into the vacation schedules of Stratford as compared to other biddres. Stratford impacts the neighborhood the worse on that count.

M5-1

Regards.

Preeti.

RESPONSE TO LETTER M5 – SHARMA

Response to Comment M5-1

The commenter states that school holidays and vacations may not align with those of the proposed project which would not allow the use of the baseball field or basketball court by the public during these times.

The commenter does not discuss the adequacy of the EIR. As described in Section 2.0 Project Description, the public would be able to use the basketball court at any time when Stratford is not using it, even when school is in session. Further, the basketball court would be a new amenity and therefore its availability during limited hours would not displace a large number of basketball court users. As such, this would not be an environmental impact under CEQA. Comment noted.

Letter N

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Concerns regarding safety of Peterson Middle School Students and the Opening of Stratford School at Partridge Avenue

Tina Franceschi < Sat, Nov 7, 2015 at 10:26 AM
To: "PlanningComr ɔv" <PlanningCommission@sunnyvale.ca.gov>,
"mishijima@sunny ɔsunnyvale.ca.gov>

Dear Planning Commission and Associate Planner Ishijima,
Thank you for the opportunity to air my concerns about the proposed Stratford School at Partridge Avenue.
I have read the Environmental Impact Report, and since I live in Birdland and understand the flow of traffic here in our area (even before the Apple II campus brings 12,000 more people into our neighborhood) I would like to shed some light on the situation that an engineer who is only studying the situation on paper may not understand (or someone who visited the site during summer as the "September 2015" date of your report suggests).
We live at 1573 Peacock Avenue, across from Raynor Park. Our daughter attends Peterson Middle School and walks to and from school daily. She (and between 75 and 100 of her peers, I would guess) use the back gate that is on Dunford, next to the petting zoo, to access Peterson Middle School. They walk or bike through the football field and arrive at school safely. If 460 students are being dropped off at Stratford daily via Dunford, this will no longer be a safe and viable option for our own Sunnyvale students. I would urge you to arrive at the Dunford gate any school day between 7:20 and 7:50 am when the bulk of these students arrive or between 2:40-3 pm in the afternoon to see for yourselves how traffic flows through our neighborhood. You may want to discuss this with Mrs. Harris or Mr.Masur at Peterson Middle School. I am sure that they can shed important light on the subject. N-1
At the end of the day, Stratford is a for-profit business. They exist to make money. And while I understand that this is the right that our City Council has provided them, I do not accept that the safety of our city residents or their children should be put to risk to do so.
Thank you-
Tina Franceschi
1573 Peacock Avenue
Sunnyvale

RESPONSE TO LETTER N – FRANCESCHI

Response to Comment N-1

This comment expresses concerns over traffic safety in the Birdland neighborhood for students traveling to Peterson Middle School across Dunford Way.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 2.

Letter O

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford School

Elaine Manley Sun, Nov 8, 2015 at 9:00 PM
Reply-To:
To: mishijima@sunnyvale.ca.gov

Hi,

I was just studying the materials on the Draft EIR. I had a couple of questions:

Is there a way they can stagger the school times between AppleSeed and Laurelwood and Stratford so we don't hit gridlock with everyone having to get to school at the same time?

I saw this was something mentioned but I didn't see if this was indeed going to be coordinated. O-1

Also if Alternative 3 is chosen for Adult Education, I assume the $14mil that Stratford paid is gone. Would the city receive any funds? Or would they have to pay any funds to maintain it? O-2

And is Alternative 2 possible? It seems like 520 students is too many for that school and for the traffic in our neighborhood so I'm inclined to think Alternative 2 is better with the maximum attendees reduced 20% but is it truly possible that Stratford would agree to reduce to this? O-3

Thank you for your time,

Elaine Manley on Hamshire Ct

RESPONSE TO LETTER O – MANLEY

Response to Comment O-1

The commenter asks if school times could be staggered between AppleSeed, Laurelwood, and the proposed project so gridlock could be alleviated.

The commenter does not discuss the adequacy of the EIR. Section 2.0 Project Description states that Stratford would work to stagger schedules to avoid gridlock. Comment noted.

Response to Comment O-2

The commenter asks if Alternative 3 is chosen, would the City receive any funds or would the City have to pay to maintain the school.

The commenter does not discuss the adequacy of the EIR. Monetary compensation for Alternative 3 is not an impact on the physical environment and therefore not addressed in the Draft EIR. The funding for Alternative 3 would have to be arranged between the City and an adult school operator. Comment noted.

Response to Comment O-3

The commenter states that Alternative 2 is a better project but would the project applicant agree with this reduction in students.

Alternatives are used to define possible options that would reduce or avoid the project's environmental impacts. Alternatives also have to meet most of the project objectives. As the ultimate decision-makers, the City of Sunnyvale City Council would approve the project in the City's preferred form. Whether the project applicant would agree, a reduction is not part of the CEQA environmental analysis. The commenter is also referred to Master Response 3 for additional information regarding Alternatives.

Letter P

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Draft EIR for the project STRATFORD SCHOOL AT PARTRIDGE AVENUE

Denise DeLange . Mon, Nov 9, 2015 at 1:17 AM
Reply-To: Denise DeLange
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>, "PlanningCommission@sunnyvale.ca.gov" <PlanningCommission@sunnyvale.ca.gov>, "council@sunnyvale.ca.gov" <council@sunnyvale.ca.gov>
Cc: BirdlandNeighbors <birdlandneighbors@yahoogroups.com>, Raynor Park Neighborhood Association <raynorshine@yahoogroups.com>

Dear Planner Ishijima, Planning Commissioners, and Council Members

This is a response to the draft EIR for the project STRATFORD SCHOOL AT PARTRIDGE AVENUE ENVIRONMENTAL IMPACT REPORT dated SEPTEMBER 2015.

I would like to start with the alternatives evaluated and dismissed. Since the City of Sunnyvale sets the project goals, unwanted alternatives can be disqualified just by setting the objectives. This appears to have been done in this case. Project objective 4, Enhance the city's recreational and educational opportunities, was never a stated objective in the offer for sale and appears to be added only to make Alternative 3 fail. It seems absurd that the project would be decided on the basis of the addition of a basketball court that was never requested. Similarly, the Open Space alternative is dismissed because it would not meet the project objectives. Let's be honest. There is only one real objective for this project: Sale the Raynor Activity Center to add cash to the city coffers with a significant amount earmarked for a branch library. Why not state the objective as such? That way, it is clear that the real alternatives are the other offers for the property. I hereby request these offers be added to the list of alternatives and be evaluated in the final EIR. P-1

Short of being honest with the project goals, I will address specific areas of the EIR that need attention.

The mural was not addressed in section 3.1, Aesthetics, as indicated in section ES.4 on page ES-3. The mural is a community treasure and is in pristine condition. This belongs in section 3.1, Aesthetics. P-2

There is a major blunder in section ES.5 SUMMARY OF ENVIRONMENTAL IMPACTS. It states: Throughout the Draft EIR, the terms "project" and "proposed project" are used to refer to the structure's demolition. I'm pretty sure neither the "project" nor "proposed project" calls for any structure's demolition. P-3

The appendices are poorly organized and documented. For example, on page 3.3-3 of the DEIR, there is a reference to Table 1 in Appendix E. However, the tables in Appendix E are not labeled. In Appendix D, there are two pages labeled Page 3 of 23 and two labeled Page 3 of 28. This is because there are actually four reports, one titled "Stratford School at Partridge Avenue Santa Clara County, Summer", one titled "Stratford School at Partridge Avenue Santa Clara County, Winter", and two titled "Stratford School at Partridge Avenue Santa Clara County, Annual". It seems the last two may be duplicated. The titles only appear on page 1 of each report. They should appear on each page. P-4

The web site lists multiple instances of Appendix G and Appendix I. This is confusing. Furthermore, the web page link indicated as Appendix G 2014 actually links to the document titled 2011 in Dropbox and vice versa. P-4

Although the project would include removal of 21 healthy, mature trees to accommodate the proposed changes, the project is deemed to meet the project objective: Preserve healthy trees on-site to the maximum extent feasible. This is another example of the objective being defined in a way to favor the project. Included in removal are 5 trees which have a circumference of 38 inches or greater and are thus subject to protection under the Municipal Code. An additional 3 healthy, mature trees would be removed in the park to build the basketball court. It is ironic that the basketball court is considered an enhancement to recreation but the tree loss is not considered a failure to preserve healthy trees. P-5

It is surprising that the air quality and traffic studies only found one significant and unavoidable impact, “During the AM peak hour, the addition of project traffic would exacerbate unacceptable LOS F operations at the intersection of Lawrence Expressway and Benton Street”. However, one significant and unavoidable impact is one too many. P-6

Summary
This is not the best project for this site. It brings too many cars into the neighborhood which impacts noise, air quality, traffic congestion, and most importantly, the safety of our children. It removes large trees. And it reduces access to our Park. Although only one impact was found to be significant and unavoidable under CEQA guidelines, we will have to live with ALL the impacts on a daily basis.

Sincerely,
Denise DeLange

RESPONSE TO LETTER P – DELANGE

Response to Comment P-1

The commenter discusses the project's objectives stating that since the City sets the project objectives, these objectives can be used to disqualify potential alternatives. The commenter states that the City should add the City's real objective for this project: the sale the Raynor Activity Center to add cash to the city coffers with a significant amount earmarked for a branch library.

The commenter does not discuss the adequacy of the EIR. Please see Master Response 3 regarding the alternative process. Comment noted.

Response to Comment P-2

The commenter states that the mural was not addressed in Section 3.1 Aesthetics as it should have been.

Impacts on aesthetic resources are based on a number of different factors as outlined by CEQA Appendix G and as described in Section 3.1 Aesthetics. For those impacts on scenic vistas, impacts are evaluated based on a scenic vista or view identified in the jurisdiction's General Plan, zoning ordinance, or some other adopted plan. For those scenic resources within a state highway, impacts are evaluated based on the project's location and impact on a scenic resource located in a scenic highway area identified the California Department of Transportation. For resources such as the mural, impacts could be identified as a degradation of visual character or quality of the site and surrounding area. However, as with most impacts on visual character, these impacts are subjective and dependent on the individual viewer.

The mural has not been identified as a scenic resource by the City's General Plan, zoning ordinance, or another adopted plan. The mural is discussed in Section 3.4 Cultural Resources and evaluated as a historical resource. Since the mural is not considered a protected resource, the project applicant could choose to retain the mural during project renovations.

Response to Comment P-3

The commenter identified a text error in the Executive Summary.

The text error has been corrected.

Page ES-4, last paragraph, sentence has been changed to the following:

Throughout the Draft EIR, the terms "project" and "proposed project" are used to refer to the ~~structure's demolition~~ project development.

We apologize for the error.

Response to Comment P-4

The commenter states that the appendices are poorly organized and documented and refers to two appendices, Biological Resources and Air Quality, which either have duplicate page

number or do not have table headings. Additionally, the commenter states that the website lists multiple instances of Appendix G and Appendix I and this is confusing.

The commenter does not discuss the adequacy of the EIR. However, as points of clarification, the tables listed in Appendix E are downloads of tables provided by the various federal and state biological databases. These printouts do not allow for text changes, including the labeling of tables. In this case, "Table 1" is considered to be the first table in the appendix. The same situation occurs with Appendix D and the duplicate page numbers. The printouts are taken from the CalEEMod air quality emissions program. Appendix D includes the four different output scenarios that were used to determine the air quality and GHG emissions. The CalEEMod program does not allow the user to change the page numbers and therefore there are duplicate pages although they are in different reports.

The website includes two Appendix G and two Appendix I as there are multiple reports in Appendix G and Appendix I. To reduce download times these reports were divided into two downloadable appendices.

Response to Comment P-5

The commenter states that although the project would include removal of 21 healthy, mature trees, the project is deemed to meet the project objective and this is another example of the objective being defined in a way to favor the project. Included in removal are 5 trees which have a circumference of 38 inches or greater and are thus subject to protection under the Municipal Code. An additional 3 healthy, mature trees would be removed in the park to build the basketball court. It is ironic that the basketball court is considered an enhancement to recreation but the tree loss is not considered a failure to preserve healthy trees.

The commenter does not discuss the adequacy of the EIR. An EIR is required to use thresholds identified by the City to determine impacts on trees. In this case, City Municipal Code Chapter 19.94 requires a tree 38 inches or greater in circumference measured 4.5 feet aboveground for single-trunk trees to be protected. While 5 trees with a circumference of 38 inches or greater would be removed, the project would also include replacement trees and would comply with all permitting requirements as outlined in City Municipal Code Chapter 19.94. The Municipal Code requires that replanting be included as part of the plan and that the director of community development will approve or require modifications to the plans. Tree replacement would not conflict with the project objectives.

Response to Comment P-6

The commenter states that it is surprising that the Draft EIR only found one significant and unavoidable impact regarding air quality and traffic. The commenter continues and states that one significant and unavoidable impact is one too many.

The commenter does not discuss the adequacy of the EIR. However, as a point of clarification, the Draft EIR does not identify any significant and unavoidable impacts on air quality. Comment noted.

Letter P2

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Draft EIR for the project STRATFORD SCHOOL AT PARTRIDGE AVENUE

1 message

Denise DeLange . Wed, Nov 11, 2015 at 12:25 AM
Reply-To: Denise DeLange .
To: Momoko Ishijima <mishijima@sunnyvale.ca.gov>
Cc: "PlanningCommission@sunnyvale.ca.gov" <planningcommission@sunnyvale.ca.gov>, "council@sunnyvale.ca.gov" <council@sunnyvale.ca.gov>, BirdlandNeighbors <birdlandneighbors@yahoogroups.com>, Raynor Park Neighborhood Association <raynorshine@yahoogroups.com>

Dear Ms. Ishijima,

I have some additional feedback on the Draft EIR for the project STRATFORD SCHOOL AT PARTRIDGE AVENUE.

As I mentioned at the Planning commission meeting on November 9, I believe the assumptions are flawed that produced the finding that the impact to PM traffic at the intersection of Lawrence Expressway and Benton to be significant and unavoidable for Alternative 3 - Adult School. If the adults are Sunnyvale residents, there would be no need for them to travel this intersection since it is outside the City of Sunnyvale boundaries. P2-1

As I also mentioned at the Planning commission meeting and in my previous correspondence, the other alternatives that should be evaluated are the proposals the city rejected in favor of the Stratford proposal. Specifically, they are the proposals from: P2-2
Fremont Union High School
German International School of Silicon Valley
Los Altos School District
Morgan Autism Center

I would like to point out a discrepancy in the tree removal information between the text in section 3.3 on page 3.3-15 which is supported by Appendix E, pages 1-7, and the information in Appendix B - Project Plans on pages 17 and 18. Is Appendix B or Appendix E correct? In any case, the information in Appendix E on pages 2-7 should be reformatted if kept. Also, the finding assumes that the required permits for the removal of significant trees will be approved. How can the EIR make that assumption? Lastly, on the topic of trees and landscaping, I would like to request that the city require the project to use only plants that are native to Sunnyvale in place of the plants proposed, for example, the Valley Oak (Quercus lobata) should be planted instead of the scarlet oak (Quercus coccinea), and cork oak (Quercus suber). P2-3

Please reconcile the peak enrollment estimated at approximately 520 students with Appendix B, page 3, sheet A0.2 which shows a total classroom occupancy of 1071. There are 12 classrooms with 46 occupancy, 8 classrooms with 47 occupancy, 1 classroom with 29 occupancy, and 2 kindergarten rooms with 57 occupancy. With a maximum of 3 teachers per classroom, the school could accommodate up to 1002 students. Shouldn't the EIR take into consideration the maximum occupancy? P2-4

Lastly, I would like to assert that the proposed basketball court is merely a free extension of the school property into Raynor Park. It takes away existing park space and trees. I have never seen or heard a request from anyone in the neighborhood for a basketball court in Raynor Park. In fact, there are 5 basketball courts across the street at Peterson Middle School which are accessible to the public during non-school hours. The finding should be that the project **does not** meet the objective to enhance the city's recreational opportunities. Not only does it take away park land for the basketball court, it reduces the public access to the park through the priority use agreement. P2-5

Please take these issues into consideration in the final Environmental Impact Report.

Sincerely,
Denise DeLange

RESPONSE TO LETTER P2 – DELANGE

Response to Comment P2-1

The commenter states that the assumptions used for the PM traffic at the Lawrence Expressway and Benton intersection for Alternative 3 are flawed and would not result in a significant and unavoidable impact as the students for the adult school would be Sunnyvale residents and therefore there would be no need for these students to use this intersection.

Traffic assumptions for Alternative 3 include vehicle trips from all directions since it would be speculative to assume only Sunnyvale residents would attend the adult school. Adult school serve as regional centers, more so than neighborhood facilities, therefore traffic patterns differ than those for a neighborhood school. We cannot also predict what intersections potential students would use to access the project site. These assumptions are based on transportation specialists' knowledge of similar projects. Comment noted.

Response to Comment P2-2

The commenter states that the alternatives she mentioned during the Planning Commission meeting and her previous correspondence should also be analyzed.

The commenter is referred to Master Response 3 for a discussion on Alternatives.

Response to Comment P2-3

The commenter states that there is a discrepancy in the tree removal information between the text in Section 3.3 on page 3.3-15 which is supported by Appendix E, pages 17, and the information in Appendix B Project Plans on pages 17 and 18. Additionally, the commenter asks how the EIR can make the assumption that required permits for the removal of significant trees will be approved. Lastly, the commenter would like to request that the city require the project to use only plants that are native to Sunnyvale in place of the plants proposed.

After reviewing both Appendix B (Tree Disposition Table Sheet L1.2) and Appendix E (Tree Survey Data), as well as the information provided on page 3.3-15 referring to trees to be removed by type, no discrepancies were found. Please note that project plans included in the Draft EIR are not the final plans and discrepancies would be fixed during final design stages.

The EIR does not make the assumption that permits for removing trees would be approved. The EIR states, on page 3.3-15, that the community development director has the ability to approve the replanting plan or require modifications to the plan. No permitting of the tree removal was assumed in the analysis. It is important to note that the project applicant would not be able to remove any trees on the site without City approval. A landscaping plan would be part of the project applicant's final approval package, indicating the type of plants to be used and where.

Response to Comment P2-4

The commenter states that based on information provided on Appendix B Sheet A0-3, the project could accommodate up to 1,002 students and the EIR should take into consideration the maximum capacity.

Classroom capacity shown on Sheet A0-2 is based on a building code analysis of student per square footage. This does not represent the proposed maximum number of students for the project, only that the classrooms are of adequate size to meet the code requirements for the proposed student capacity. The EIR is based on the maximum number of students proposed by the applicant (520) and therefore does account for maximum capacity in the environmental analysis.

Response to Comment P2-5

The commenter states that the basketball court is merely an extension of the school and no basketball court is needed at the park.

The comment does not discuss the adequacy of the EIR. The need of a basketball court in Raynor Park is not part of the environmental analysis under CEQA. The physical impacts related to basketball court construction and operation are analyzed in the Draft EIR. Comment noted and no change is needed.

Letter Q

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

DEIR - Stratford Public Comment

J Clothier Mon, Nov 9, 2015 at 12:47 PM
Reply-To: J Clothier
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>
Cc: . " .

Dear Project Planner Ishijima,

I am a former driver for children that attended Stratford School at the Cox Campus in Saratoga for one year and then they transferred to the Strawberry Park Campus in San Jose. I drove them home from that campus for two years. I had to get there 45 minutes early and wait in line to get the kids at noon and at 3pm. It was a hassle for me as a driver. If I was late I would get charged around $15 per child (billed to the parent's account). I can't imagine how the residents around the school felt. The traffic would wrap around the neighborhood. Then there was always the parent that tried to cut the queue, block driveways, talk on their cellphone, read a book, put on make-up, not move up when needed and block side streets so no one could turn onto them. They were not respectful drivers and would speed past you to try and get in front of you. There was always this rushed feeling and tension when I would get my friend's children.

Q-1

I would like to explain the process that a parent or a driver goes through for pick-up. The name of the child is placed in the window visor or held up. When you are seven to ten cars away from your turn one of the employees calls the name/names on the walkie talkie for those children to be brought out of the auditorium The children line up. They then have a teacher bring out the children to your car. If the children are younger and can't get their seat belts on the teacher has to put them on. I drove home one girl that got out at noon which was pre-k. That wasn't as bad as driving two which turned into three small girls with three large backpacks that needed to go into the back of my mini-van. So, I would have to get out and open my trunk. They put the backpacks in and would get inside the van. Then the teacher would have to put their seat beats on with their car seats -which is no easy task in a mini-van. It takes around 3-5 minutes for all that to take place. I don't know what the drop off is like in the morning. But parents rushing to work are probably worse drivers then.

I also want to bring up this is not a free school. This is an expensive private school. There was a study done by Berkeley psychologists Paul Piff and Dacher Keitner. "Piff and his colleagues discreetly observed the behavior of drivers at a busy four-way intersection. They found that luxury car drivers were more likely to cut off other motorists instead of waiting for their turn at the intersection. This was true for both men and women upper-class drivers, regardless of the time of day or the amount of traffic at the intersection. In a different study they found that luxury car drivers were also more likely to speed past a pedestrian trying to use a crosswalk, even after making eye contact with the pedestrian." I have copied and pasted this from Scientific America: How Wealth Reduces Compassion

How Wealth Reduces Compassion

As riches grow, empathy for others seems to decline

View on **www.scientificamerica...** Preview by Yahoo

In conclusion, Raynor Park does not need to be saturated with more traffic which means rushed and anxious drivers ignoring the needs of the neighborhood. Let's stop the money talking and listen to the residents of Raynor Park and Birdland. City of Sunnyvale it is time to listen to us.

Sincerely,

Joan Clothier
1375 Norman Drive
Sunnyvale, CA 94087

RESPONSE TO LETTER Q – CLOTHIER

Response to Comment Q-1

The commenter discusses his experience transporting school children from school and the time it takes to pick up the children.

The commenter does not discuss the adequacy of the EIR. We appreciate the personal account regarding student transport. Comment noted.

Letter R

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

EIR Raynor Activity Center/Landscaping

Deborah Marks . Mon, Nov 9, 2015 at 2:59 PM
Reply-To: Deborah Marks .
To: "PlanningCommission@Sunnyvale.ca.gov" <PlanningCommission@sunnyvale.ca.gov>
Cc: Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Dear Commissioners:

In looking at the plans for the Raynor Activity Center one notices the amount of trees to be removed (24), but there is no real landscape plan with a listing of the trees to be planted in the future at the site.

A landscape plan is needed to clarify this and to add more trees and greenery. At a school site where children are the great part of their day, nature is always a welcome component.

R-1

Trees could be an added feature between the long row of buildings. One could plant about 4 to 5 trees of medium height (about 25') with a broad canopy between the buildings. Space and permeability on the ground would have to be allowed for successful planting. Trees for shade in the parking lots would also be welcome as well as trees in the courtyard for the children when they are having lunch or activities outside.

These are just some suggestions to the plans for Raynor but I hope they are taken into consideration.

Sincerely,

Deborah Marks

RESPONSE TO LETTER R – MARKS

Response to Comment R-1

The commenter makes suggestions on landscaping at the project site.

The commenter does not discuss the adequacy of the EIR. Please note that a landscape plan (sheet L1.1 through L2.2) is part of Appendix B. The landscape plan is part of the final project approval process and would be reviewed and approved by City of Sunnyvale staff prior to project construction.

Letter S

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford School

Harry Whitesell . Mon, Nov 9, 2015 at 10:37 PM
Reply-To: Harry Whitesell .
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>, Li Yan Miao .

Dear honorable members of the Sunnyvale City Council,

I am writing to highlight several deep flaws in the Stratford School Draft EIR and urge your rejection of the report.

1) Site Plan & Project Proposal:
Reject the joint use agreement which gives priority use to Stratford; loss of park space; loss park hours for public usage. S-1
The proposed basketball court should be situated away from current housing to eliminate noise and disturbance to residents. The proposed location is too close to existing housing, picnic areas and should be moved to the north near Dunford. My preference is to return this site back to park. Since I know that Sunnyvale council want to develop, the next alternative is for Stratford to reconfigure the site to meet their needs without priority use of the park. That requires removal of existing buildings, building 2 story structures and their own playground space within the dimensions of the project. S-2

2) Traffic

Same as Letter F

The traffic analysis in the report seems to assess the traffic situation as simply a capacity issue of having 312 cars driving through two-lane neighborhood roads. The situation is much worse than that because the cars are not just passing through - they are waiting to negotiate their way into the school, with most of the traffic coming within a very short window of time (15-30 minutes), causing major delays on all roads leading to the school. In particular, there is no analysis of how traffic would move along Dunford Way and Partridge Ave during the critical 15-30 minutes before the start of school. In addition, there are often many vehicles parked along Dunford in both East & West directions blocking safe vision for turning onto Dunford from Partridge. Pedestrians walking along Dunford & Partridge
The # of parking spaces is not adequate for the proposed size of the school.

As a very rough estimate, assume the driveway on Dunford Way is about 200 ft and the proposed drive aisle on the east side of the project is 500 ft. Assuming an average car length of 13.5 ft plus space between cars of two feet, the capacity of the Dunford driveway is 13 cars and the capacity of the two-lane drive aisle is 64 cars. If each car takes only 10 seconds to pull up to the drop-off area, drop off the child and pull away, it would take 13 minutes just to clear these 77 cars, or about 52 minutes for the 312 projected in-bound trips.
So for the good part of an hour, more than 230 cars will be waiting to get into the drop-off loop, choking up traffic on Partridge Ave, Dunford Way through to Wolfe Road and Dunford Way through to Lawrence Expressway. The traffic congestion will be made worse by cars that have left the school on Partridge Ave and want to go back eastward on Dunford Way towards Lawrence Expressway, or westward towards Wolfe Road.
Given this scenario, it is not unexpected if cars from the west on Dunford Way will try to turn right from Dunford Way onto Partridge Ave so as to drop off their students on Partridge Ave across the school, creating a hazardous situation for these students as they meet cars traveling north on Partridge Ave after exiting the

campus. Likewise, cars coming from the east on Dunford Way can expect long delays waiting to turn left into the Dunford driveway and are likely to be tempted to drop their students off on Dunford Way itself, creating an even more dangerous situation for their students.
There is no substantiation that the mitigation measures (MM 3.14.1a-d) would reduce the impact of on-site circulation system to less than significant. In particular, MM3.14.1c is woefully inadequate to deal with the potential hazards listed above.
The traffic analysis also does not take into the account the impact of all this additional traffic on the safety of children walking or biking to Peterson Middle School or Laurelwood Elementary School from within the neighborhood.
It is also inconceivable that the 81 parking lots would be adequate for the operation of a school of 520 students (Page 3.14-78). Parents will likely have to park in the surrounding streets during school events, depriving neighborhood residents of their street parking.

Wolfe road is being overbuilt to the point of gridlock, new apple campus, potential butcher corner project, hotel @ summerwind property, the central & wolfe leased apple site. Residents along this road are already subjected to constant traffic. In the future, many residents will be stuck idling in their cars trying to turn across constant flow of traffic, some streets lack turning lanes, blocking another lane until a gap in traffic allows safe turning.

Raynor School was built to serve students living in Birdland, not students who commute from elsewhere. Furthermore, Raynor School probably was not built to serve 520 students (or for that matter, 416 students per Alternative 2). The unalterable fact remains that the school is not situated in an area that can safely accommodate a school with 520 students mostly commuting from outside the neighborhood and no mitigation,.

As discussed above, the Stratford School Draft EIR has deeply flawed methodologies and conclusions. It has not addressed the traffic and the safety issues for students and residents during peak drop-off times. A private school serving students commuting from elsewhere cannot be safely accommodated on this site and I strongly urge your rejection of the project.

Thank you for your consideration.

Harry Whitesell
Liyan Miao
957 Durlane Ct

RESPONSE TO LETTER S – WHITESELL

Response to Comment S-1

The commenter states that the City Council should reject the joint use agreement.

The commenter does not discuss the adequacy of the EIR. Please see Master Response 4 regarding the Joint Use Agreement. Comment noted and no changes made.

Response to Comment S-2

The commenter states that the proposed basketball court should be moved to the north toward Dunford Way to eliminate noise and disturbance to nearby housing. The commenter continues and states that the site should be reconfigured by removing existing buildings and constructing new buildings and playground space to allow for uses which are now proposed for the park.

The commenter does not discuss the adequacy of the EIR. Section 3.10 Noise discusses noise increases from basketball court usage and finds those impacts would be less than significant. Please see Master Response 3 regarding project alternatives and the alternative process under CEQA.

Comments from a Previous Letter

The commenter provides the same comments as provided by Wee-Lee Lim (Letter F).

The commenter is referred to Response to Comments F-1 through F-11.

Letter T

My name is Henry Alexander and I have been a resident of the Raynor Park community for 10 years. My family and I decided to move to this area of Sunnyvale based on the many conveniences and the quiet surroundings.

Each of my three children have attended Laurelwood Elementary and Peterson Middle School and we have been fortunate to live in a home in safe walking distance from both of these outstanding schools as many of our neighbors children have done as well for decades.

Living within ¼ to ½ mile from where this school will be built gives me a unique perspective in that I live on the corner of Marion Drive which becomes Dunford Road which runs perpendicular to Partridge Avenue.

During the times which are most impacted with traffic, between 8 – 8:30 AM and after school from 3 Pm – 6 Pm there is an influx of vehicles who cut through many of the streets which include Marion Drive to avoid the traffic of Lawrence, Homestead and Wolfe road. Speeding has no longer become the exception but the rule as many cars are in a hurry to drop their kids off at school and make it to work on time in our increasingly busy lives. T-1

Over the past two years as President of the Raynor Park Neighborhood Association I have been privileged to hear firsthand from the many residents in not only Raynor Park but the Birdlands community as well of the many safety concerns that surround speeding and the abundance of traffic in the area. Collectively we have met as concerned neighbors to discuss with the City our concerns, alternative solutions and are in hopes that we can achieve a compromise given the facts that are being presented as part of this upcoming move into our community by Stratford school.

The largest majority of kids who attend the schools in our area, being Laurel Wood and Peterson, do so because we as parents pay the high cost of housing so that our kids can attend the best public schools. Few of us can afford the expense of private schools and this is why we have moved to the area

According to the Environmental Defense Fund there are several issues that surround idling cars which will be a reality of the Stratford School move as a majority of the kids who will be in attendance as described by Stratford school will be from outside of the area.

First, idling pollutes the air and harms health. Idling tailpipes spew out the same pollutants that form unhealthy smog and soot as those from moving cars. Nitrogen oxide, particulate matter, carbon monoxide and volatile organic compounds are the main health-harming pollutants in vehicle emissions. T-2

These pollutants have been linked to serious human illnesses, including asthma, heart disease, chronic bronchitis and cancer.

Children, the elderly and those with asthma and other chronic health problems are especially vulnerable to the health dangers of exhaust.

Pollution from idling contributes to global warming. Idling cars and trucks emit carbon dioxide (CO2), a main heat-trapping gas. In the Bay Area alone, idling cars and trucks each year produce 130,000 tons of carbon dioxide. To offset this amount of global warming pollution, we would need to plant an area the size of Santa Clara with trees every single year. T-3

Idling wastes fuel and money. An idling car uses between 1/5 to 7/10 of a gallon of fuel an hour.

Over the past several years we have seen an abundance of changes in and around the City of Sunnyvale. While change is inevitable it has come against the wishes of those who are in the neighborhood. I encourage each of you to visit the area yourselves during the height of traffic times between 8 AM – 8:30 Am just to observe. Then imagine for yourself the potentially 400 vehicles which could be added to the flow of traffic on a daily basis. T-4

Without any additional plans from the City to calm traffic from the many arterials and collector streets it is my opinion that this is a flawed decision given the potential increase in traffic from the Apple complex and the Stratford School. I ask that you consider the wishes and concerns of the residents that you represent and halt this move until a significant improvement is made to calm traffic and reduce the emissions that this addition will cause our community.

Respectfully Submitted,

Henry Alexander III

1491 Navarro Dr.

Sunnyvale, CA 94087

RESPONSE TO LETTER T – ALEXANDER

Response to Comment T-1

This comment states concerns over traffic safety in the Birdland neighborhood as it relates to cut-through traffic and speeding during AM and PM peak periods.

Please see Master Responses 1 and 2.

Response to Comment T-2

The commenter states that idling cars raises several issues which will become a reality of the proposed project. These issues include air quality and health issues.

The commenter does not discuss the adequacy of the EIR. However, as noted in Section 3.2 Air Quality, the project would not exceed air quality thresholds during project operation. Exposure to toxic air contaminants (TACs) was evaluated as a part of the air quality analysis. It is important to note that the proposed circulation system as described in Section 2.0 Project Description is meant to minimize car idling and waiting times. This analysis showed the project would result in a less than significant impact. Comment noted.

Response to Comment T-3

The commenter states that idling cars contributes to global warming and that in the Bay Area alone, idling cars and trucks each year produce 130,000 tons of carbon dioxide.

The commenter does not discuss the adequacy of the EIR. Draft EIR Section 3.6 Greenhouse Gas Emissions determined that the project would not result in a significant impact on climate change.

Response to Comment T-4

This comment expresses concerns over traffic congestion and safety in the Birdland neighborhood. The comment highlights the potential increase in traffic associated with the Apple Campus 2 and the need for traffic calming.

Please see Master Responses 1 and 2.

Letter U

Eleanor S . Hansen
1086 S. Bernardo Avenue
Sunnyvale, CA 94087-1505

November 10, 2015

Mr. James Griffith and
Sunnyvale City Council
Sunnyvale City Hall
456 W. Olive Street
Sunnyvale, CA 94088-3707

Re: Comment on the D.E.I.R for Stratford School on Partridge Avenue

Quote: *For the love of money is the root of all evil*
I Timothy 6:10 (KJV)

Dear Major and City Council.

I find the executive summary of the Stratford School Final Transportation Impact Analysis to be breathtaking in the strength and directness of its conclusions. I have directly copied and pasted:

Cumulative plus Project Conditions

Based on the City of Sunnyvale and VTA's impact criteria, the Project is expected to have a significant impact at the Lawrence Expressway/Benton Street (#11) intersection.

During the AM peak hour, the addition of Project traffic is projected to exacerbate unacceptable LOS F operations at the intersection and meet VTA's impact criteria for significant impacts for both the Baseline and Alternate Scenarios. The Project's impact would be significant and unavoidable due to lack of feasible mitigation measures.

The residents of this neighborhood have repeatedly complained about the likely, indeed very, very likely traffic impacts of this project in their neighborhood and the Stratford School prepared Final Transportation Impact Analysis confirms their worst suspicions. It is clear that greed, and not greater public benefit, is the motivation behind this project.

If this project cannot be modified so that Project's impacts are not significant, then it should not be approved. It is not that there is a major shortage of private and rather expensive private non-sectarian elementary schools in

U-1

Santa Clara County, indeed in that particular area of Santa Clara County. Since it is at one of the edges of Sunnyvale, a comparison that merely includes Sunnyvale is not an apt analysis.

About the argument that this Stratford School and all its environmental and quality of life damage to this neighborhood is necessary for the overall good of the residents of the city of Sunnyvale, I can only say – Balderdash.

Two projects are mentioned – expansion of the Washington Park Pool and building of a new branch library at Lakewood Park. I strongly believe that if the Washington Park Pool needs to be expanded, you can find the funds for that otherwise. I hope it is used a lot more than the Fremont Pool or you are wasting your money. I hope it is not another case like the not used tennis courts at Orchard Gardens Park on Garner. You might as well tear those up and plant succulents for all the use they are getting now. U-2

As some of you know, I have been attending public outreach meetings on the new Civic Center Modification. At the last one, I attended on Saturday, Oct 3rd, the one for the general public, I was surprised. Indeed I was quite surprised. At least one man, perhaps several, was or were vociferous, in their arguments that the library in the Civic Center does not need to be enlarged. If residents will question a library in the Civic Center, how much more will they question a library at the north edge of the city. I would expect a strong challenge, when you start having hearings for all residents and when you are starting to talk about actually spending and not just setting money aside, but actually spending money, raised by taxes on all of us, I think you could find that actually getting a library at the northern edge of the city approved could prove more difficult than is currently imagined. Right now, I see it as a pie in the sky project, which I do not think anyone should count on being built.

So, I reiterate, if you and Stratford School cannot mitigate the traffic impacts to below a not significant level, it should not be build. It is not as if this were a truly necessary facility such as an Urgent Care Clinic [which PAMF closed when it took over the Camino Medical Group]. This Stratford School is not necessary and should not open unless the traffic impacts using cumulative as well as current at all neighborhood intersections is less than significant. Greed should not triumph over public benefit. U-3

Very truly yours,

Eleanor S. Hansen

Eleanor S. Hansen

Attachment: Pages 10-11
Executive summary of the Stratford School Final Transportation Impact Analysis

RESPONSE TO LETTER U – HANSEN

Response to Comment U-1

The commenter states that if the project cannot be modified so that project's impacts are not significant, then it should not be approved.

The commenter does not discuss the adequacy of the EIR. The City of Sunnyvale City Council has power of approval for the project. Further, certification of the CEQA document does not equate to project approval. Comment noted.

Response to Comment U-2

The commenter talks about the Washington Park pool and states that if the pool is not used more than the Fremont pool or the tennis courts at Orchard Gardens Park, money is being wasted.

The commenter does not discuss the adequacy of the EIR. Financial issues and how money would be used from this particular transaction are not part of environmental issues evaluated under CEQA.

Response to Comment U-3

The commenter states that if City Council and Stratford School cannot mitigate the traffic impacts to below a not-significant level, it should not be built.

Please see Response to Comment U-1. It is important to note that CEQA Section 15091 requires that an agency make findings of fact when approving a project with any significant effects. The finding must include a brief explanation of the rationale behind the findings and they must be supported by substantial evidence in the record.

Letter V

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Comments on the EIR for the Sale of Raynor School to Stratford School

1 message

Shannon Milne . Tue, Nov 10, 2015 at 12:06 AM
To: mishijima@sunnyvale.ca.gov

Hello

I am writing to you to express my concerns about the proposed sale to Stratford School.

My biggest concern is about the traffic congestion that will be added to the already busy area during morning drop-off with Laurelwood, Peterson, Appleseed and the two or three other schools utilizing the former Patrick Henry Middle School campus. Laurelwood is already at full capacity with cars coming from all directions. V-1

I am also concerned about the use of Raynor Park with the taxpayers subsidizing their priority use of the field for their sports activities. It does not seem fair to encroach on public space during times when local children's sports teams shoul have access to these fields. V-2

I am also concerned for the neighbors directly around the proposed new school whose streets will be used for parking on a regular basis as well as increased traffic flow of cars from other neighnorhoods dropping off their children. These neighbors have already been negatively impacted (dust and road work traffic slowdowns) by the Apple construction project just a few blocks away and the additional traffic once the facility is finished has not yet been factored in. V-3

Please heed the concerns of those affected by this proposal and take additional time to reflect on what the ramifications will be to our neighborhood.

Thank you for taking the time to read my concerns.

Sincerely,

Shannon Milne
1332 Thunderbird Ave.
Sunnyvale, CA 94087

RESPONSE TO LETTER V – MILNE

Response to Comment V-1

This comment states concerns over traffic congestion in the Birdland neighborhood. The comment notes that streets are busy during mornings due to Laurelwood, Peterson, and Appleseed schools.

Please see Master Response 2.

Response to Comment V-2

The commenter states her concern about the project using Raynor Park facilities with taxpayers subsidizing the project's priority use.

The commenter does not discuss the adequacy of the EIR. The commenter is referred to Master Response 4 discussing the Joint Use Agreement for the park facilities. It is also noted that Stratford's use of Raynor Park would not conflict with local team use, as outlined in Section 3.12 Recreation. Funding of park maintenance is not an issue under CEQA and therefore it is not discussed in the Draft EIR. Comment noted.

Response to Comment V-3

This comment states concerns over traffic congestion and parking in the Birdland neighborhood.

Please see Master Response 2 regarding traffic counts and congestion in the project area. The project site provides an adequate amount of parking for the proposed use and Stratford School would enforce rules regarding neighborhood parking.

Letter W

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

EIR Stratford School

1 message

Mary Walz . Tue, Nov 10, 2015 at 8:52 AM
To: mishijima@sunnyvale.ca.gov

Dear Planner Ishijima,

I've lived at 1634 Quail Ave for the past 10 yrs and am most concerned about the traffic studies that do not include the new Apple campus employing approx 15k employees. W-1

Traffic has increased dramatically in our neighborhood will only get worse when the school is approved for 520 students and when the campus is completed. Has this study taken into consideration the Kohl's project, Butchers corner and other projects in the area. Perhaps a new EIR is in order that includes current projects vs. non-project volume. W-2

I'll end by attaching a pic of the traffic that currently gets backed up on Quail Ave in front of my house and up to Lanark Court during the evening commute. This is only going to get worse if you approve this project and flood our neighborhood with additional cars, noise, impact air quality and the safety of our families. W-3

Sincerely,
Mary

Sent from my iPad 2

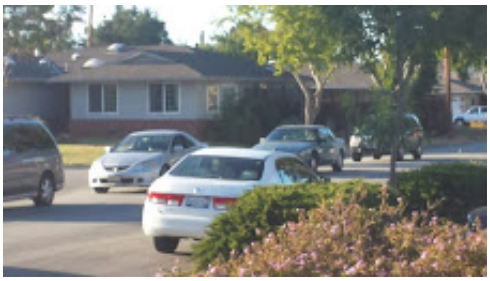

image1.JPG
98K

RESPONSE TO LETTER W – WALZ

Response to Comment W-1

This comment states that the Draft EIR did not include the Apple Campus 2.

Please see Master Response 1.

Response to Comment W-2

This comment states concerns over traffic congestion in the Birdland neighborhood and questions whether nearby projects such as Gateway Village and Butcher's Corner were considered.

Please see Master Responses 1 and 2.

Response to Comment W-3

This comment states concerns over traffic congestion in the Birdland neighborhood.

Please see Master Response 2.

Letter X

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford EIR report

1 message

Nitin Bahadur _ . Tue, Nov 10, 2015 at 9:27 AM
To: mishijima@sunnyvale.ca.gov

Dear Mr Momoko Ishijima,

Thanks for sharing the Stratford EIR report. The report is well written and detailed. I live in the Raynor Park neighborhood. I do have some comments regarding how the EIR report feels that the neighborhood won¹t be impacted.

Comment 1

In Section 3.12 (Recreation), the report says, "Additional after-hours use by Stratford not specifically noted in the Joint Use Agreement would be based on availability of space with no impact to the other groups using the open space area².

Now this looks a little suspicious. If the additional after-hours usage of the park is available to Stratford for ³reservation², then is it not possible that Stratford can reserve most of the time (in advance), thereby leaving little time for the other game leagues. Even if Stratford is a good citizen of the neighborhood, if Stratford also has the opportunity to ³reserve² the space after-hours, then isn¹t it adding one more participant to the set of participants who can book the park. So if there were 2 teams before and now there are 3 teams, that makes the availability of the park to each team go down from 1/2 to 1/3. Isn¹t that a significant impact?

X-1

The EIR also says, "Priority field use hours on school days for Stratford School for Area 1 (Figure 3.12.2) are from 9:00 a.m. to 3:00 p.m.². Can the EIR be modified to sayŠ

"Priority field use hours on school days for Stratford School for Area 1 (Figure 3.12.2) are from 9:00 a.m. to 3:00 p.m. In addition there are after-use hours, as noted below².

I want this clarification because the after-use section does not specify which areas (Area 1, Area 2) are for after-hour use. And the current sentence is giving the reader a false impression.

X-2

Comment 2

‹‹‹‹-----
In Section 3.13 (Utilities), the draft seems to assume that the amount of water used by the park will be same even after Stratford starts using the park. From all the schools I know, schools use more water for their fields than regular recreational parks (due to continuous wear and tear). If I am correct, then it means the City of Sunnyvale will have to figure out how to redirect more water to the park. If the city can redirect more water to Raynor park, then maybe I should be watering my lawns more frequently these days (hey the city already has the excess water right?). Thus I don¹t consider ³water usage² as a ³less than significant² impact.

X-3

Comment 3
-----‹‹‹‹
What is unclear in this report is whether the extra upkeep and maintenance of Raynor Park (due to continuous student usage) will result in a much higher maintenance & utility bill on the City. I am presuming it will (unless you can prove me wrong). And if it will, then will the city reduce the maintenance on other parks to make up for the difference?

X-4

Thanks for your consideration.

Regards
Nitin

RESPONSE TO LETTER X – BAHADUR

Response to Comment X-1

The commenter discusses the project's ability to reserve use of the park facilities after hours, stating that allowing this results in a significant impact.

As with all members of the public, the sports fields can be reserved in advance by the project applicant. However, as virtually any entity has this availability, no impact would occur. In addition, the reservation of park facilities is not an impact on the physical environment and therefore, the reservation of such facilities is not discussed in the EIR.

Response to Comment X-2

The commenter would like a revision of text for Area 1 use in the EIR to make it clearer to the reader.

The description of use and hours for Areas 1 and 2 are quoted directly from the Joint Use Agreement. Revising the text in the Draft EIR to the description provided by the commenter would not be consistent with the language proved in the Joint Use Agreement, and would result in inconsistencies. Further, exhibits are included to clearly show both priority use areas. Therefore, the text in the Draft EIR cannot be revised.

Response to Comment X-3

The commenter states that schools use more water to maintain their athletic fields than parks because of constant use and therefore the city will have to provide more water to Raynor Park to maintain the fields. This is not a less than significant impact.

The commenter does not provide any information on the comparison of the amount of water use for school athletic fields versus public park athletic fields. A water supply and demand assessment was completed for the proposed project and provided in Draft EIR Section 3.13 Utilities. This assessment determined that the project would have a less than significant impact on the City's water supply. Further, in Section 3.14 Recreation City of Sunnyvale policies regarding turf maintenance are discussed. With implementation of such policies it was found that the project would have a less than significant impact on Raynor Park.

Response to Comment X-4

The commenter asks if the City will reduce the maintenance on other parks due to the increase of upkeep and maintenance at Raynor Park because of project use.

The commenter does not discuss the adequacy of the EIR. City policy and future decisions are not part of the scope of this Draft EIR. Comment noted and no change made.

Letter Y

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Draft EIR / Stratford School Project

Carol Colao . Tue, Nov 10, 2015 at 12:13 PM
To: mishijima@sunnyvale.ca.gov
Cc: PlanningCommission@sunnyvale.ca.gov, council@sunnyvale.ca.gov

Dear Planner Ishijima,

As a Birdland resident I, along with many of my neighbors, have concerns regarding this protect and the impact it will have on our quality of living here.

The traffic is one of the biggest concerns. Adding up to 520 students will surely impact the number of cars coming to and from our neighborhood -- a neighborhood already stressed with delivering students to the various schools. What of air quality? Street safety? Speeding! Y-1

Environmental Impact concerns:
Objective: to preserve healthy trees on-site. . . How many trees, of the 21 planned to be removed, are protected? (38"diameter or greater) Y-2

Will our mural be preserved? Y-3

And limited access to a park that is for public use? I say "No!" Do not limit our use! As tax payers, our monies help to maintain the park and is for the CITY activities -- not for the use of a private entity. Y-4

Thank you for your reconsideration to provide an option that has less of an impact on our daily lives and actually benefits the residents of our neighborhood.

Respectfully,

Carol Colao

RESPONSE TO LETTER Y – COLAO

Response to Comment Y-1

The commenter states that traffic, air quality, street safety, and speeding are a big concern.

The commenter does not discuss the adequacy of the EIR. However, the commenter is referred to Master Responses 1 and 2 regarding traffic and safety. The commenter is also referred to Response to Comment F-1 regarding air quality impacts.

Response to Comment Y-2

The commenter asks how many trees to be removed are protected.

As stated in Section 3.3 Biological Resources, 5 of the 21 trees to be removed are 38 inches in diameter or greater and thus are subject to protection under the Municipal Code.

Response to Comment Y-3

The commenter asks if the mural will be preserved.

The commenter does not discuss the adequacy of the EIR. The commenter is referred to Response to Comment P-2 for a discussion of the mural.

Response to Comment Y-4

The commenter declares her dissatisfaction to limiting public use of the park.

The commenter does not discuss the adequacy of the EIR. The commenter is referred to Master Response 4 discussing the Joint Use Agreement for the park facilities. Comment noted.

Letter Z

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Draft EIR for the project STRATFORD SCHOOL AT PARTRIDGE AVENUE

Lyja Levas Tue, Nov 10, 2015 at 5:02 PM
To: mishijima@sunnyvale.ca.gov

Dear Planner Ishijima,

This is a response to the draft EIR for the project STRATFORD SCHOOL AT PARTRIDGE AVENUE ENVIRONMENTAL IMPACT REPORT dated SEPTEMBER 2015.

I have been a resident of the Birdland neighborhood for 10 years. One of the things that attracted me to the neighborhood was Raynor Park and the local schools. It was a very quiet and friendly neighborhood, and I felt completely safe with having my two sons walk or bicycle around the area to go to school, the park or visit friends.

Fast forward 10 years. Now we are dealing with the madness of the Apple campus development along Homestead Ave. Cars constantly cut through and speed through the neighborhood. I live near the interesection of Lorne and Quail Avenues. I see cars line up every night to exit the neighborhood onto Homestead Avenue. The security and safety I once felt with my sons walking or biking through the neighborhood is no longer there.

The addition of the Straford School on Partridge Avenue will only add to the traffic issues of the neighborhood. The proposed morning drop-off times and afternoon pick-up times are in line with the existing schools in the neighborhood so would have significant impact to the congestion in the neighborhood streets. The report notes that the proposed project would lead to "a slight increase in traffic volumes on several neighborhood streets" (3.14-85). The school is anticipated to have 460 students. I would say that the number of vehicles driving the students (not to mention staff) would more than lead to a "slight increase." Z-1

The report does note that their would be "significant impact" to the unsafe conditions to both bicyclists and pedestrians. Mitigation measures would be required but I worry that would not be enough. For example, cars constantly speed down Quail Avenue, despite the posted speed limits. Z-2

The traffic issues will start even with the construction, which according to the draft EIR, is estimated to take approximately 5 months. So during this timeframe, an estimated 52 daily round trips will be made by the construction trucks! The report outlines that 182 crew workers will be on site. Where will these construction workers park if there are only 91 parking stalls that currently exist? What are the chances that these construction workers will carpool? Slim to none? They may be told to not park in the residential area, but so have the Apple construction workers, yet I have seen them park in our residential areas and bike over to their work site. What would stop these construction workers from doing the same thing? Z-3

The EIR is very thorough (and overwhelming) for an ordinary citizen like me to digest, but I cannot see how converting this site to a Stratford School would have anything other than a great significant impact to all those that live in this neighborhood.

Sincerely,
Lyja Levas

RESPONSE TO LETTER Z – LEVAS

Response to Comment Z-1

This comment states concerns over traffic congestion in the Birdland neighborhood. The comment questions the traffic impacts associated with the project.

Please see Master Response 2.

Response to Comment Z-2

This comment states concerns over traffic safety in the Birdland neighborhood, particularly speeding along Quail Avenue.

Please see Master Response 2.

Response to Comment Z-3

This comment expresses concerns over the impacts of construction workers on parking and traffic in the Birdland neighborhood.

The applicant would be required to prepare a construction management plan, which would include details about when most construction traffic would occur (i.e., not during the peak commute periods), construction access paths, staging areas, and construction worker parking. This plan would likely limit parking in the neighborhood and ultimately would need to be approved by the City prior to project construction.

Letter A-1

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Response to Stratford School EIR for Raynor Park location

1 message

Shomir Dighe . Tue, Nov 10, 2015 at 11:50 PM
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>, "\"PlanningCommission@sunnyvale.ca.gov\"" <PlanningCommission@sunnyvale.ca.gov>, "\"council@sunnyvale.ca.gov\"" <council@sunnyvale.ca.gov>
Cc: BirdlandNeighbors <birdlandneighbors@yahoogroups.com>, Raynor Park Neighborhood Association <raynorshine@yahoogroups.com>

Dear members of the Sunnyvale City Council,

I am writing to highlight several deep flaws in the Stratford School Draft EIR and urge your rejection of the report. I live on Inverness Way and we are already experiencing heavier traffic from cars cutting through, wanting to avoid the Wolf Homestead intersection. I am echoing similar concerns about this project that have been expressed so eloquently, by my Birdland neighbor Wee Lee. In particular:

A. Air quality impact -Section 3.2

Same as Letter F

1. Table 3.2-3 (Page 3.2-5) shows that our area is already in violation of federal and/or state air quality standards for ozone, coarse particulate matter and fine particulate matter. An air quality impact is considered significant if among other things, the project would (i) violate any air quality standard or (ii) contribute significantly to an existing or projected air quality violation. Yet, the project is deemed not to have a significant impact on air quality on the basis of BAAQMD significance thresholds (Table 3.2-6) without converting the estimated emissions (pounds/day) into the air quality standards of Table 3.2-4 (ppm) to determine if the project actually causes a violation in additional air quality standards. Clearly, the project will already exacerbate the existing violations for ozone, coarse and fine particulate matter, but the report dismisses the effects by stating "the correlation between a project's emissions and increases in nonattainment days, or frequency or severity of related illnesses, cannot be accurately quantified" (Page 3.2-18) and blithely concludes that the project's impact is less than significant. The cumulative effect of the project's emissions on the existing air quality of this area needs to be determined, rather than comparing project contributions relative to a significance threshold.
2. BAAQMD Regulation 14 (Page 3.2-10) requires measures to reduce emissions of air pollutants from mobile sources by reducing motor vehicle use and/or promoting use of clean fuels and low-emission vehicles. The report fails to quantify the project's impact on air quality measures and provides no measures to comply with Regulation 14.
3. The report also claims that the project will not contribute to localized concentrations of mobile-source carbon monoxide that would exceed applicable ambient air quality standards (Page 3.2-20), the standard being increasing traffic volumes at affected intersections to more than 44,000 vehicles per hour. If you consider that the Levi stadium has just over 30,000 parking lots, even the stadium will not create a situation of more than 44,000 vehicles per hour! We need to take into account the context of the project and this threshold of 44,000 vehicles per hour is clearly not the correct standard to use to determine the project's impact on carbon monoxide emissions in a *residential area with a park where many young children congregate and play.* Instead, the report needs to determine the air quality impact in ppm of carbon monoxide from the additional vehicle trips and determine if it leads to a violation of the standards listed in Table 3.2-4.

B. Traffic -Section 3.14

1. The traffic analysis in the report seems to assess the traffic situation as simply a capacity issue of having 312 cars driving through two-lane neighborhood roads. The situation is much worse than that because the cars are not just passing through - they are waiting to negotiate their way into the school, with most of the traffic coming within a very short window of time (15-30 minutes), causing major delays on all roads leading to the school. In particular, there is no analysis of how traffic would move along Dunford Way and Partridge Ave during the critical 15-30 minutes before the start of school.
2. As a very rough estimate, assume the driveway on Dunford Way is about 200 ft and the proposed drive aisle on the east side of the project is 500 ft. Assuming an average car length of 13.5 ft plus space between cars of two feet, the capacity of the Dunford driveway is 13 cars and the capacity of the two-lane drive aisle is 64 cars. If each car takes only 10 seconds to pull up to the drop-off area, drop off the child and pull away, it would take 13 minutes just to clear these 77 cars, or about 52 minutes for the 312 projected in-bound trips.
3. So for the good part of an hour, more than 230 cars will be waiting to get into the drop-off loop, choking up traffic on Partridge Ave, Dunford Way through to Wolfe Road and Dunford Way through to Lawrence Expressway. The traffic congestion will be made worse by cars that have left the school on Partridge Ave and want to go back eastward on Dunford Way towards Lawrence Expressway, or westward towards Wolfe Road.
4. Given this scenario, it is not unexpected if cars from the west on Dunford Way will try to turn right from Dunford Way onto Partridge Ave so as to drop off their students on Partridge Ave across the school, creating a hazardous situation for these students as they meet cars traveling north on Partridge Ave after exiting the campus. Likewise, cars coming from the east on Dunford Way can expect long delays waiting to turn left into the Dunford driveway and are likely to be tempted to drop their students off on Dunford Way itself, creating an even more dangerous situation for their students.
5. There is no substantiation that the mitigation measures (MM 3.14.1a-d) would reduce the impact of on-site circulation system to less than significant. In particular, MM3.14.1c is woefully inadequate to deal with the potential hazards listed above.
6. The traffic analysis also does not take into the account the impact of all this additional traffic on the safety of children walking or biking to Peterson Middle School or Laurelwood Elementary School from within the neighborhood.
7. It is also inconceivable that the 81 parking lots would be adequate for the operation of a school of 520 students (Page 3.14-78). Parents will likely have to park in the surrounding streets during school events, depriving neighborhood residents of their street parking.

C. Noise -Section 3.10

1. Traffic-It is inconceivable that the additional 312 cars during peak times (in a 15-20 minutes window) would only increase the noise levels by .1 dba on neighborhood streets as suggested by table 3.10-4 and that the impact would be ‘less than significant’.

2. Extracurricular Activities. Section 3.10.2. Even during peak youth activities, we have never had anywhere close to this influx of 520 kids that will be converging on the field during lunch breaks on a daily basis and on special events. That noise level is not ‘insignificant ‘as suggested by the report.

D. Recreation -Section 3.12- Playing field and Basketball Court

1. Priority access for 20 years to the public funded playing field during school hours, at the expense of residents is a concern especially as Stratford has a year round program.
2. Building a basketball court on public ground without any inputs from neighbors who have to put up with the noise and the crowd it attracts, is also a concern.

At the end of the day, Raynor School was built to serve students living in Birdland, not students who commute from elsewhere. Furthermore, Raynor School probably was not built to serve 520 students (or for that matter, 416 students per Alternative 2). The unalterable fact remains that the school is not situated in an area that can safely accommodate a school with 520 students mostly commuting from outside the neighborhood and no mitigation, save for busing all of the students from some central location outside the neighborhood, can ensure their safety. But wait, Apple is already doing that, so now, are we proposing to add more buses on Wolf?

As discussed above, the Stratford School Draft EIR has deeply flawed methodologies and conclusions. It has not addressed the noise and air quality impact of the project on an ongoing basis and completely misses the traffic and the safety issues for students and residents during peak drop-off times. A private school serving students commuting from elsewhere cannot be safely accommodated on this site and I strongly urge your rejection of the project.

Thank you for your consideration.

Shomir Dighe

RESPONSE TO LETTER A1 – DIGHE

Response to Comment A1-1

The commenter provides the same comments as provided by Wee-Lee Lim (Letter F).

The commenter is referred to Response to Comments F-1 through F-11.

Letter A-2

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Comments on the Draft EIR for the Stratford School at Partridge Avenue

1 message

Debbie Wetmore . Wed, Nov 11, 2015 at 12:23 AM
Reply-To: Debbie Wetmore .
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

Dear Momoko Ishijima,

I am writing to comment on the draft EIR for the Stratford School at Partridge Avenue. I have been a resident in the Birdland area of Sunnyvale, and in my house, for 12 years. The proposed site for the Stratford school is 0.5 miles from my house. I am deeply concerned about the impact the school will have on traffic in this area. While the EIR proposes that many students will take public transit, walk, bike, or carpool to the proposed campus, I believe the impact on traffic in the neighborhood has been grossly underestimated. I watch my neighbors getting in cars to drive their kids to schools that are walking distance. I already see long back-ups on the major streets that feed into our neighborhood. I watch impatient drivers cross over to the left side of the road because the car in front of them is not driving fast enough, speed up to get ahead of bicyclists, and ignore pedestrians in crosswalks. These unsafe practices will only get worse with additional cars coming into the neighborhood. I believe the project should include an impact assessment based on the worst possible scenario of 520 cars (their maximum student population) coming in to drop off and pick up students. I also believe the proposal needs to take into account the impact of the new Apple Campus on the same neighborhood as the two campuses are only about a mile from each other.

A.2-1

A.2-2

A.2-3

I know that there are many other details in the EIR, but this is the area of concern for me.

Respectfully,
Debbie Wetmore
1590 Nuthatch Lane
Sunnyvale, CA 94087

RESPONSE TO LETTER A2 – WETMORE

Response to Comment A2-1, A2-2 and A2-3

This commenter states concerns over the project's impact on traffic congestion and safety in the Birdland neighborhood. The comment asserts that the impact on traffic in the neighborhood is underestimated because few students will walk, bike, or take transit to school, and that additional traffic in the neighborhood will exacerbate existing traffic safety concerns. The comment suggests that the DEIR should take into account the Apple Campus 2 and a scenario of 520 cars dropping off and picking up students.

Please see Master Responses 1 and 2. Please also note the traffic assessment did not discount any trips for alternate modes of transportation and that a conservative approach was taken to assume that all students would be picked up and dropped off via personal cars.

Letter A-3

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Draft EIR comments for Stratford school project

KnC Wed, Nov 11, 2015 at 9:06 AM
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

Hi,

I understand that times have changed and our planet is more populated than it once was.

I'm ok with Stratford school, but I am concerned about SAFETY in birdland.

ROAD DIET, like they have on Calabazas in Santa Clara, could we get this, please?

A3-1

Thank you,

Karen Shemwell

Sent from my iPad

RESPONSE TO LETTER A3 – SHEMWELL

Response to Comment A3-1

This comment expresses concerns over traffic safety in the Birdland neighborhood and suggests a road diet as a possible solution.

Please see Master Response 2.

Letter A4

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford

Chris Padden . Wed, Nov 11, 2015 at 9:13 AM
Reply-To: Chris Padden .
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

My name is Kristin Brennan and I live on Lochness Court. I have serious concerns about the EIR for Stratford School. This project will greatly increase the traffic flow through the neighborhood and will pose a risk to my children who ride their bikes down Quail to Peterson Middle School. Our neighborhood has seen a dramatic increase in the amount of traffic cutting through and the addition of Apple and Stratford will only exacerbate the issue. A4-1

Additionally, the amount of usable park space will be greatly limited for neighborhood residents with the Stratford preferred use rights. A4-2

I urge you to reconsider this project given the negative impact on the quality of the lives and the environment for those of us who live in the neighborhood.

Regards,
Kristin Brennan

RESPONSE TO LETTER A4 – BRENNAN

Response to Comment A4-1

This comment expresses concerns over traffic safety in the Birdland neighborhood and the project's impacts for students bicycling down Quail Avenue to Peterson Middle School. The comment notes a perceived increase in cut-through traffic and traffic impacts associated with the Apple Campus 2.

Please see Master Responses 1 and 2.

Response to Comment A4-2

The commenter states that the amount of usable park space will be greatly limited for neighborhood residents with the preferred use of the proposed project.

The comment does not discuss the adequacy of the EIR. However, the commenter is directed to Section 3.12 Recreation, which discusses current park use. Additionally, the commenter is referred to Master Response 4 discussing the Joint Use Agreement for the park facilities.

Letter A5

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

DEIR Stratford School at Raynor

Mark Beyer . Wed, Nov 11, 2015 at 9:20 AM
To: mishijima@sunnyvale.ca.gov

Dear Ms. Ishijima,

I live on Dunford way a short distance from Raynor Park. My primary concerns are

1) Stratford is effectively taking over parkland with the establishment of a basketball court that no resident requested. This added noise and reduced green space is not wanted nor is it accounted for in the EIR. A5-1
2) Traffic on Dunford is already dangerous. I frequently cannot get out of my driveway during commute hours without the added traffic from Stratford. The level of added traffic is also greatly underestimated. A5-2
3) 500 students is too much for the already crowded neighborhood. This level must be reduced. I do not see sufficient accounting for the effect on park use as well as traffic. A5-3

Regards,
--
Mark Beyer
1064 Dunford Way
Sunnyvale CA

RESPONSE TO LETTER A5 – BEYER

Response to Comment A5-1

The commenter states that the proposed project is effectively taking over the park and that the added noise and reduced green space is not accounted for in the EIR.

Operational noise, including new playgrounds, a new volleyball court, and a new basketball court, is accounted for in Section 3.10 Noise under Impact 3.10.2. As stated in this section:

> **"**The nearest existing noise-sensitive receptors are the single-family homes fronting Peacock Avenue to the south of the site at approximately 100 feet distant. There are also single-family homes on Quail Avenue at approximately 100 feet away. Noise levels associated with exterior recreational activities, such as recess and physical education activities, average less than 60 dBA at 50 feet from the acoustical center of the source, and lowering as the acoustical center gets farther away. As previously described, the project site and surrounding vicinity currently experiences noise levels of approximately 60 dBA. As such, the project would not introduce any noise conditions that would exacerbate existing condition over the identified significant impact of a 3dBA increase. Therefore, the outdoor activities would not result in a substantial change in ambient noise levels at nearby noise-sensitive land uses."

Further, there would be no reduction in green space as the commenter suggests. Although the project would limit public use of Areas 1 and 2, based on analysis included in Section 3.12, such limitations would not displace a substantial amount of users, as park usage is low during the day. The public has the right to use Areas 1 and 2 at any time when Stratford is not using it, even during Stratford priority hours. Further, the addition of a basketball court would add a park amenity and is not considered a reduction of green space, since it would be open to the public.

Response to Comment A5-2

This comment states concerns over traffic safety on Dunford Way. The comment asserts that trip generation for the project is underestimated.

Please see Master Response 2 regarding project area safety and Master Response 1 regarding trip generation. A conservative approach was taken by assuming that the majority of students would be dropped off and picked up in vehicles.

Response to Comment A5-3

This comment states concerns over traffic congestion in the Birdland neighborhood.

Please see Master Response 2.

Letter A6

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford School Project

dena donahue . Wed, Nov 11, 2015 at 9:24 AM
Reply-To: dena donahue .
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

My name is Dena Donahue and I have been a resident of the Raynor Park/ Birdland community for 22 years. My family and I decided to move to this area of Sunnyvale based on the many conveniences and the quiet surroundings.
My three children attended Laurelwood Elementary and we were fortunate enough to allow them to walk to school. Over the past 10 years we have seen a major change in traffic. While my children attended Laurelwood, I tried to get changes made to the intersection of Teal and Dunford. One of our daughters was actually glanced (hit) by car which was cutting across the intersection to Appleseed school. What I found is that Santa Clara owns part and Sunnyvale was part of the intersection and both councils claimed that the traffic problem was the issue of the other city.
For the Stratford School, this appears to be a Sunnyvale only issue. However, it will also impact the traffic at Teal and Dunford again and will greatly impact the safety of local kids walking and on bikes. Drop off and pick up for all the schools is a hazardous time to be walking or driving in the area. A6-1
According to the Environmental Defense Fund there are several issues that surround idling cars which will be a reality of the Stratford School move as a majority of the kids who will be in attendance as described by Stratford school will be from outside of the area.
Idling pollutes the air and harms health. These pollutants have been linked to serious human illnesses, including asthma, heart disease, chronic bronchitis and cancer. Children, the elderly and those with asthma and other chronic health problems are especially vulnerable. There is an amazing amount of asthma already in the area. A6-2
Over the past several years we have seen an abundance of changes in and around the City of Sunnyvale. While change is inevitable it has come against the wishes of those who are in the neighborhood. I encourage each of you to visit the area yourselves during the height of traffic times between 8 AM – 8:30 AM and again at 5:00 to 6:00 PM just to observe. Imagine what an additional 350 – 400 vehicles would be. A6-3
I am in support of the Stratford school if traffic calming measures can be completed. We purchased our house before AppleSeed was established and the soccer fields were leased out to and already have seen a huge impact in traffic. Not everyone will come in from Wolf, they will cut in from Lawrence or El Camino on Teal and Thunderbird which are especially vulnerable as they are long straight stretches. On a daily basis I see speeding, running stop signs and cell phone use as people drive down the street. Please consider traffic measures before proceeding. A6-4
Cordially,

Dena Donahue

RESPONSE TO LETTER A6 – DONAHUE

Response to Comment A6-1

This comment states concerns over traffic safety around Laurelwood Elementary School at the intersection of Teal Drive and Dunford Way. The comment expresses concerns over the impacts to walking and biking around the neighborhood.

Please see Master Response 2.

Response to Comment A6-2

The commenter states that the idling of cars pollutes the air and harms health.

The commenter does not discuss the adequacy of the EIR. However, as noted in Section 3.2 Air Quality, the project would not exceed air quality thresholds during operation. Exposure to TACs was evaluated as a part of the air quality analysis. This analysis showed the project would result in a less than significant impact. Comment noted.

Response to Comment A6-3

This comment expresses concerns over traffic congestion in Sunnyvale.

The commenter does not discuss the adequacy of the EIR. Please see Master Response 2.

Response to Comment A6-4

This comment states concerns over traffic safety in the Birdland neighborhood, particularly as it relates to speeding.

Please see Master Response 2.

Letter A.7

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford EIR report - Feedback

rhp Wed, Nov 11, 2015 at 9:44 AM
Reply-To: rhp .
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>, "PlanningCommission@sunnyvale.ca.gov" <PlanningCommission@sunnyvale.ca.gov>

Hello,

I am a resident of Birdland and live within 2000 feet of the proposed Stratford school at Patridge Avenue. We love this neighborhood because it is a small oasis within the hustle and bustle of the surrounding areas. However, this project will adversely impact the current quality of life for us, the residents, and foresee that this oasis will be no more . As a resident with two small children, this project right in the heart of our neighborhood has the potential to adversely change the quality of living to its residents in the following areas:

1. Traffic
2. Pollution
3. Free use of Raynor Park

A.7-1

I would like to urge the rejection of this report or a dramatic scaling down of the proposed project that can fit within the constraints of this neighborhood.

In specific, I would like to second what many of my neighbors have already pointed out and including them in my objections.

Same as Letter F

A. Air quality impact (Wee-Lee)

1. Table 3.2-3 (Page 3.2-5) shows that our area is already in violation of federal and/or state air quality standards for ozone, coarse particulate matter and fine particulate matter. An air quality impact is considered significant if among other things, the project would (i) violate any air quality standard or (ii) contribute significantly to an existing or projected air quality violation. Yet, the project is deemed not to have a significant impact on air quality on the basis of BAAQMD significance thresholds (Table 3.2-6) without converting the estimated emissions (pounds/day) into the air quality standards of Table 3.2-4 (ppm) to determine if the project actually causes a violation in additional air quality standards. Clearly, the project will already exacerbate the existing violations for ozone, coarse and fine particulate matter, but the report dismisses the effects by stating "the correlation between a project's emissions and increases in nonattainment days, or frequency or severity of related illnesses, cannot be accurately quantified" (Page 3.2-18) and blithely concludes that the project's impact is less than significant. The cumulative effect of the project's emissions on the existing air quality of this area needs to be determined, rather than comparing project contributions relative to a significance threshold.
2. BAAQMD Regulation 14 (Page 3.2-10) requires measures to reduce emissions of air

pollutants from mobile sources by reducing motor vehicle use and/or promoting use of clean fuels and low-emission vehicles. The report fails to quantify the project's impact on air quality measures and provides no measures to comply with Regulation 14.

3. The report also claims that the project will not contribute to localized concentrations of mobile-source carbon monoxide that would exceed applicable ambient air quality standards (Page 3.2-20), the standard being increasing traffic volumes at affected intersections to more than 44,000 vehicles per hour. If you consider that the Levi stadium has just over 30,000 parking lots, even the stadium will not create a situation of more than 44,000 vehicles per hour! We need to take into account the context of the project and this threshold of 44,000 vehicles per hour is clearly not the correct standard to use to determine the project's impact on carbon monoxide emissions in a ***residential area with a park where many young children congregate and play***. Instead, the report needs to determine the air quality impact in ppm of carbon monoxide from the additional vehicle trips and determine if it leads to a violation of the standards listed in Table 3.2-4.

B. Traffic

1. The traffic analysis in the report seems to assess the traffic situation as simply a capacity issue of having 312 cars driving through two-lane neighborhood roads. The situation is much worse than that because the cars are not just passing through - they are waiting to negotiate their way into the school, with most of the traffic coming within a very short window of time (15-30 minutes), causing major delays on all roads leading to the school. In particular, there is no analysis of how traffic would move along Dunford Way and Partridge Ave during the critical 15-30 minutes before the start of school.
2. As a very rough estimate, assume the driveway on Dunford Way is about 200 ft and the proposed drive aisle on the east side of the project is 500 ft. Assuming an average car length of 13.5 ft plus space between cars of two feet, the capacity of the Dunford driveway is 13 cars and the capacity of the two-lane drive aisle is 64 cars. If each car takes only 10 seconds to pull up to the drop-off area, drop off the child and pull away, it would take 13 minutes just to clear these 77 cars, or about 52 minutes for the 312 projected in-bound trips.
3. So for the good part of an hour, more than 230 cars will be waiting to get into the drop-off loop, choking up traffic on Partridge Ave, Dunford Way through to Wolfe Road and Dunford Way through to Lawrence Expressway. The traffic congestion will be made worse by cars that have left the school on Partridge Ave and want to go back eastward on Dunford Way towards Lawrence Expressway, or westward towards Wolfe Road.
4. Given this scenario, it is not unexpected if cars from the west on Dunford Way will try to turn right from Dunford Way onto Partridge Ave so as to drop off their students on Partridge Ave across the school, creating a hazardous situation for these students as they meet cars traveling north on Partridge Ave after exiting the campus. Likewise, cars coming from the east on Dunford Way can expect long delays waiting to turn left into the Dunford driveway and are likely to be tempted to drop their students off on Dunford Way itself, creating an even more dangerous situation for their students.
5. There is no substantiation that the mitigation measures (MM 3.14.1a-d) would reduce

the impact of on-site circulation system to less than significant. In particular, MM3.14.1c is woefully inadequate to deal with the potential hazards listed above.

6. The traffic analysis also does not take into the account the impact of all this additional traffic on the safety of children walking or biking to Peterson Middle School or Laurelwood Elementary School from within the neighborhood.
7. It is also inconceivable that the 81 parking lots would be adequate for the operation of a school of 520 students (Page 3.14-78). Parents will likely have to park in the surrounding streets during school events, depriving neighborhood residents of their street parking.

2. Extracurricular Activities. Section 3.10.2. Even during peak youth activities, we have never had anywhere close to this influx of 520 kids that will be converging on the field during lunch breaks on a daily basis and on special events. That noise level is not 'insignificant 'as suggested by the report.

C. Recreation -Section 3.12- Playing field and Basketball Court (Shomir Dighe and others)

1. Priority access for 20 years to the public funded playing field during school hours, at the expense of residents is a concern especially as Stratford has a year round program.
2. Building a basketball court on public ground without any inputs from neighbors who have to put up with the noise and the crowd it attracts, is also a concern.
3. At the end of the day, Raynor School was built to serve students living in Birdland, not students who commute from elsewhere. Furthermore, Raynor School probably was not built to serve 520 students (or for that matter, 416 students per Alternative 2). The unalterable fact remains that the school is not situated in an area that can safely accommodate a school with 520 students mostly commuting from outside the neighborhood and no mitigation

Respectfully,

Raghu Prasad
Kennard Way
Sunnyvale

RESPONSE TO LETTER A7 –PRASAD

Response to Comment A7-1

The commenter states that the project will adversely change the quality of life in the neighborhood due to traffic, pollution and free use of Raynor Park.

The commenter does not discuss the adequacy of the EIR. Please note that the Draft EIR discusses the project's contribution to air quality, traffic, and recreational facilities in the project area. The analysis is based on existing conditions. Based on available data the Draft EIR found that, besides one significant and unavoidable impact to traffic, the project would have a less than significant impact on the environment through implementation of feasible mitigation measures.

Comments from a Previous Letter

The commenter provides the same comments as provided by Wee-Lee Lim (Letter F).

The commenter is referred to Response to Comments F-1 through F-11.

Letter A8

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Raynor Park and Strafford School

Lisa Schreiber Wed, Nov 11, 2015 at 12:17 PM
To: mishijima@sunnyvale.ca.gov

Dear Momoko,

I would like to second Henry Alexander's comments without repeating them here. I also moved here 10+ years ago and have seen the same changes. I am not in favor of the priority use agreement. I have concerns that our neighborhood children will not have enough space locally to play or practice with their teams after school Where will neighbors be able to play sports spontaneously? A8-1

The traffic in the neighborhood near the schools when the school day starts and ends is very heavy and on rainy days it can move at a crawl during these times. I would rather have a smaller school on a different bell schedule in this location with shared access to the park fields - no exclusive use permit. Recess time is not likely to be a problem during common school hours. However, after school I know our kids coaches are always needing places to practice. This is our neighborhood park not private school land. A8-2

Please listen to our neighborhood. We are the ones who will live with the daily impact of the decisions being made. With all the housing growth that is being proposed around us, I am very concerned that our local schools will not have the capacity and resources necessary to handle what may come. We are already experiencing overcrowding. I moved here to be walking distance from good schools in a safe neighborhood that was a bike commute distance from work.

Please protect our neighborhood, parks and schools to ensure that our quality of life improves.

Thank you,
Lisa Schreiber

RESPONSE TO LETTER A8 – SCHREIBER

Response to Comment A8-1

The commenter states that she is not in favor of the priority use agreement as it will not allow enough space for neighborhood children to play.

The commenter does not discuss the adequacy of the EIR. Please see Master Response 4 regarding the Joint Use Agreement.

Response to Comment A8-2

This comment states concerns over traffic congestion in the Birdland neighborhood and suggests staggering bell schedules in order to minimize impacts on the surrounding neighborhood.

As per Section 2.0 Project Description, Stratford School would stagger bell schedules with other schools in the area to avoid congestion. Further, please see Master Response 2 regarding traffic safety in the project area.

Letter A9

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford School environmental and community impact

Milichki . Wed, Nov 11, 2015 at 1:02 PM
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

Hello,

My family has resided in the Raynor park neighborhood since 2004. We are raising 2 children and have made numerous friends amongst the 3-5 mile radius of our home. Many of these friendships started from being parents whose children attended My Dream Academy (MDA) which was closed by the city of Sunnyvale 2 years ago due to the sale to Stratford. We were impacted, our children were impacted, our friends were impacted and their children too. A business was forced into bankruptcy. In fact, it was more than a business as MDA fostered the love of learning like we have not encountered since. There were approximately 200 children, most if whine lived in the neighborhood, whose parents had to scramble to find alternative childcare solutions... While the building is still closed and becomes dilapidated.
Traffic increased, as parents had to drive further away, park usage decreased for the same reason. We used to pick up the kids and spend 1-2 hours in the local park where both them and us made many new friends. That is rarely the case.

A.9-1

Putting up a private school in a neighborhood where most people can only afford or prefer a public option is not a good alternative for various reasons: increased traffic in and out, less park attendance as these kids are usually chauffeured off to the next activity or tutoring club after school, loosely knit community.

I encourage you to consider using Raynor park and the Raynor building for the purposes of a public elementary school or after care as the localLaurelwood school U.S. Overflowing and many parents are forced to look elsewhere for solutions. Bring up the quality and quantity of local public education options and institutions and you will have a thriving, vibrant and happy community and voters.

A.9-2

Respectfully,

Sirma Tzoutzova
Norman Dr., sunnyvale

Kind regards,
Sirma

RESPONSE TO LETTER A9 – TZOUTZOVA

Response to Comment A9-1

The commenter discusses her experience in the neighborhood and states that the proposed project is not a good alternative for the project site for various reasons including traffic and park use.

The commenter does not discuss the adequacy of the EIR. Please see Response to Comment A7-1.

Response to Comment A9-2

The commenter encourages the use of the property as a public elementary or after-school care facility.

The commenter does not discuss the adequacy of the EIR. Please see Master Response 3 regarding Alternatives.

Letter A.10

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

DEIR for Stratford School at Partridge Ave

1 message

Mary Rinki . Wed, Nov 11, 2015 at 1:55 PM
To: mishijima@sunnyvale.ca.gov

Dear Ms. Ishijima,

This message is to relay my concerns with regard to the aforementioned project.

My main concern is the negative impact that the increase in traffic the Stratford School will generate will have upon the Birdland neighborhood. Safety for students and residents is already negatively impacted by the traffic generated by existing schools in the area. Many of the cars are exceeding the speed limit. The intersection of Lochinvar and Dunford Wy. can be treacherous between 8 and 8:30 AM as parents drive out of the school parking lot, often seemingly distracted and in a hurry. I was nearly hit in the crosswalk there just last week by a driver leaving the school parking lot. A.10-1

More cars means more pollution. Apple is nearing completion and there is still a big question about the amount of traffic that HUGE project will generate as drivers pass through our neighborhood to work. A.10-2

There will soon be a water project along Wolfe Rd. to bring recycled water to Apple and possibly Raynor Park. The neighborhood will be impacted as drivers opt for side streets in Birdland to avoid the construction nightmare along Wolfe Rd and at Butcher's Corner. I realize construction will not last forever but our area has already been seriously inconvenienced by several years of Apple construction. A.10-3

Parking will be an issue along Dunford Way and Partridge. Already residents in the area park cars, trucks, a trailer and a RV, legally, on both sides of Dunford in front of the church and farm during the daytime hours. Can that area realistically accommodate the parking required for faculty and staff? A.10-4

The number of apartments (The Hamptons) at Wolfe Rd and Pruneridge adjacent to the Apple complex will soon be more than doubled. The students who live there currently attend Laurelwood School at Inverness and Teal in the Santa Clara Unified School District. To access any school in that district, that they may be assigned to attend, will generate more traffic through Birdland as parents avoid the heavy traffic on Homestead Rd. due to the recent increase in Kaiser members and when Apple opens, also Wolfe Rd. A.10-5

The Kohls Project on El Camino at the border of Sunnyvale and Santa Clara will also generate more traffic through the neighborhood as it's residents avoid clogged arteries such as El Camino and Lawrence Expressway.

Another concern is the promise of Raynor Park field space to the proposed Stratford School for use during many of the daylight hours for much of the year. Others have detailed their concerns in their comments to you in very great detail. I concur with them that the use of Public Park Space belonging to the residents in the City of Sunnyvale MUST NOT be promised to a private entity for any extended period of time. A.10-6

Please take my concerns and those of other residents of Birdland into consideration when determining if this project should be approved. Please consider the great negative impact traffic will have upon this neighborhood.

Sincerely,

Mary Rinki

Resident on Lochinvar near Dunford Way

RESPONSE TO LETTER A10 – RINKI

Response to Comment A10-1

This comment expresses concerns over traffic safety in the Birdland neighborhood. The comment notes safety challenges at the intersection of Lochinvar Avenue and Dunford Way and speeding in the area.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 2.

Response to Comment A10-2

This comment states concerns over the impacts of the Apple Campus 2 on traffic circulation in the Birdland neighborhood.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

Response to Comment A10-3

This comment states concerns over construction impacts on Wolfe Road and at Butcher's Corner and the ongoing inconveniences associated with the construction of the Apple Campus 2.

This comment does not address the adequacy of the Draft EIR. While these concerns are noted, they are not a result of the project. Please see Master Response 1 for cumulative traffic impacts scenarios.

Response to Comment A10-4

This comment questions whether the project will sufficiently accommodate parking demand and the parking impacts on the surrounding area.

Please see Response to Comment F-9.

Response to Comment A10-5

This comment expresses concerns regarding the traffic impacts associated with nearby projects in Sunnyvale and Santa Clara.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 1.

Response to Comment A10-6

The commenter states that the use of a public park must not be promised to a private entity for any extended period of time.

The commenter does not discuss the adequacy of the EIR. The commenter is referred to Master Response 4 discussing the Joint Use Agreement for the park facilities. Comment noted.

Letter A.11

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Comment on the DEIR for the Stratford School Project

Yunhong Li . Wed, Nov 11, 2015 at 2:25 PM
To: mishijima@sunnyvale.ca.gov

Dear Mrs Ishijima,

This is Yunhong Li, a 10 year resident in the Raynor Park community.
I'm writing to express my concern of potential traffic issue with the Straford school project.

There are currently three school sites in that area, the Laurelwood Elementary, Appleseed daycare and Peterson middle. The first two are right adjacent to the new school location of Straford. My son goes to Laurelwoord 5th grade and previously attended Appleseed, so I have many years of first hand experience about the traffic during school open/close hours. There is a lot of traffic on Dunford Rode during those hours. Besides the above three campuses, there is a large soccer field behind Appleseed campus, which is accessible only from Dunford and can increase traffic significantly during the evenings. Cars have a hard time merge onto Dunford from the Appleseed parking lots during the peak hours. Plus the heavy traffic pose a great danger to pedestrians on the sidewalk of Dunford or nearby.

A.11-1

From my discussion with the neighbors, many of us share the same concern that the Straford project will make the
traffic a lot worse than current situation. With the completion of new Apple campus nearby, it's expected even more
traffic will be routed to this neighborhood.

We hope the city can take our opinions into account when planning the new school development project. The traffic
has to be improved before introduction of an additional school.

Best regards,
Yunhong (Karmen Ct)

RESPONSE TO LETTER A11 – LI

Response to Comment A11-1

This comment expresses concerns regarding existing traffic congestion and safety along Dunford Way. The comment suggests that the proposed project and Apple Campus 2 will exacerbate these concerns.

Please see Master Responses 1 and 2.

Letter A.12

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

My responses for the Stratford DEIR

1 message

vivian Wed, Nov 11, 2015 at 2:47 PM
Reply-To: vivian
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

To City Planer and Whom It May Concern,

My name is Vivian Lam and I have been a resident of the Raynor Park community for 20 years. My family and I love this quiet surroundings and the neighborhood.

Each of my 2 children have attended Laurelwood Elementary and Peterson Middle School and we have been fortunate to live in a home in safe walking distance from both of these outstanding schools as many of our neighbors children have done as well for decades.

Over the past several years we have seen an abundance of changes in and around the City of Sunnyvale. While change is inevitable it has come against the wishes of those who are in the neighborhood. I encourage each of you to visit the area yourselves during the height of traffic times between 8 AM – 8:30 Am just to observe. Then imagine for yourself the potentially 400 vehicles which could be added to the flow of traffic on a daily basis.

A.12-1

Without any additional plans from the City to calm traffic from the many arterials and collector streets it is my opinion that this is a flawed decision given the potential increase in traffic from the Apple complex and the Stratford School. I ask that you consider the wishes and concerns of the residents that you represent and halt this move until a significant improvement is made to calm traffic and reduce the emissions that this addition will cause our community.

Best Regards,
Vivian Lam

RESPONSE TO LETTER A12 – LAM

Response to Comment A12-1

The commenter discusses the traffic in the area during the peak hours and asks that the project be halted until significant improvements are made to calm traffic and reduce emissions.

The commenter does not discuss the adequacy of the EIR. The commenter is referred to Master Responses 1 and 2 discussing cumulative traffic impacts and traffic safety. Also, as discussed in Section 3.2 of the Draft EIR, the proposed project would not result in any significant impacts on air quality. Comment noted.

Letter A.13

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford School at Partridge Avenue DEIR comments

Martin Landzaat _ . Wed, Nov 11, 2015 at 3:04 PM
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

Dear Ms. Ishijima:

I have the following questions/comments about the Stratford School at Partridge DEIR:

The DEIR uses the description “The full-size court would feature an asphalt play surface and would be surrounded by a 12-foot-tall vinyl-coated chain-link fence.” What does a vinyl coated chain-link fence look like? Please provide a drawing of the proposed fencing material.

A.13-1

If the vinyl coating is slats that obscure the view into the basketball court, the fence will be ugly and out of character with the rest of the park. In addition, vinyl slats would provide a screen for people doing undesirable activities in a public park. A public safety officer driving past the basketball court should be able to look into the court without leaving his/her vehicle.

Section 3.12–Recreation makes reference to Appendix J which lists data from only three visits to Raynor Park. I’m reminded of the story of a group blind people where each person touches one part of an elephant; the blind people have differing descriptions of the elephant. The author(s) did not make enough visits to Raynor Park to make an accurate assessment of parks use. Even worse, the author(s) made an afternoon visit at the wrong time. According to Appendix J, the PMC staff visited Raynor Park on April 30, 6:00 PM, presumably the complete date/time was Thursday April 30, 2015 at 6:00 PM. According to the joint use agreement in Appendix C, Stratford School will have priority use of Area 1 from 4:00PM to 5:30PM on Thursdays during the months Febuary – May. A 6:00PM observation on April 30th would not have yielded accurate information on the number of Raynor Park users displaced between 4:00PM – 5:30 PM. The Final EIR should include more Raynor Park observations, the observations should be made at times when Stratford School has priority use of Area 1.

A.13-2

Regards,

Martin Landzaat

Sunnyvale, CA

RESPONSE TO LETTER A13 – LANDZAAT

Response to Comment A13-1

The commenter asks what the vinyl-coated chain-link fence looks like and states that a fence using the vinyl slats would provide screening for people to do undesirable activities in the park.

The commenter does not discuss the adequacy of the EIR. The chain-link fence would not use slats. The vinyl coating is a coating to cover the links themselves as well as the posts and top post. An example of this type of fencing is shown below. Comment noted.

Response to Comment A13-2

The commenter states that the park use observation was not an accurate assessment of park use due to minimal park visits and visit times.

The Draft EIR cited three dates for on-site visits at three different times. Additionally, the park maintenance staff was contacted by the City as well as by the Draft EIR preparers to discuss park use. The park staff would have the most knowledge of actual park use as they are on-site every day. Data was also gathered based on reservations of park facilities by sports teams and

the community. On-site visits, data from the City of Sunnyvale, and park staff communications are considered adequate to determine the amount of park use during different times of the day.

Letter A.14

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

comments on the Environmental Impact Report

preeti ray . Wed, Nov 11, 2015 at 3:20 PM
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>
Cc: preeti ray .

Respected members of the Sunnyvale City Council,

We are writing to express our concerns about the Stratford School Draft EIR.

We are 19 year residents of this area. We initially bought here as we wanted a diverse, quiet and family friendly neighborhood for us and our children. Since moving here we have had 3 children. Our kids have attended and are still enrolled in the local schools. All three attended Laurelwood Elementry and Peterson Middle and over the years they biked and walked to their respective schools as it was safe enough to do so.
Over the years with the growth in the area we are finding that the traffic is getting much heavier and we are seeing a much larger number of cars driving our streets. This is especially true during the peak times in the morning and afternoon when the schools are starting or letting out and when it is normal commute time. Our local schools are now over full and on counting I find that there are already 5 schools present around here. It is being difficult if not impossible to let younger kids walk or bike to school as the neighborhood traffic is not reasonable during the rush hours.

A.14-1

In addition with the addition of the Apple campus on Homestead we expect to get even more traffic going through our neighborhood.

From talking to some of the very long time residents we have learnt that Raynor School was the original Elementary school for this neighborhood. With Laurelwood totally impacted it would be more appropriate to open this up again as a neighborhood school (which would have mostly local walking students) rather than to bring 300-400 additional cars into the neighborhood AND having to either bus our local kids to other elementary school or put more portables on the already overfull campus.

I would also like to direct the Council's attention to what our neighbor Wee Lee has already expressed in relation to the Air Quality:

A. Air quality impact -Section 3.2

Same as Letter F

1. *Table 3.2-3 (Page 3.2-5) shows that our area is already in violation of federal and/or state air quality standards for ozone, coarse particulate matter and fine particulate matter. An air quality impact is considered significant if among other things, the project would (i) violate any air quality standard or (ii) contribute significantly to an existing or projected air quality violation. Yet, the project is deemed not to have a significant impact on air quality on the basis of BAAQMD significance thresholds (Table 3.2-6) without converting the estimated emissions (pounds/day) into the air*

quality standards of Table 3.2-4 (ppm) to determine if the project actually causes a violation in additional air quality standards. Clearly, the project will already exacerbate the existing violations for ozone, coarse and fine particulate matter, but the report dismisses the effects by stating "the correlation between a project's emissions and increases in nonattainment days, or frequency or severity of related illnesses, cannot be accurately quantified" (Page 3.2-18) and blithely concludes that the project's impact is less than significant. The cumulative effect of the project's emissions on the existing air quality of this area needs to be determined, rather than comparing project contributions relative to a significance threshold.

2. *BAAQMD Regulation 14 (Page 3.2-10) requires measures to reduce emissions of air pollutants from mobile sources by reducing motor vehicle use and/or promoting use of clean fuels and low-emission vehicles. The report fails to quantify the project's impact on air quality measures and provides no measures to comply with Regulation 14.*
3. *The report also claims that the project will not contribute to localized concentrations of mobile-source carbon monoxide that would exceed applicable ambient air quality standards (Page 3.2-20), the standard being increasing traffic volumes at affected intersections to more than 44,000 vehicles per hour. If you consider that the Levi stadium has just over 30,000 parking lots, even the stadium will not create a situation of more than 44,000 vehicles per hour! We need to take into account the context of the project and this threshold of 44,000 vehicles per hour is clearly not the correct standard to use to determine the project's impact on carbon monoxide emissions in a residential area with a park where many young children congregate and play. Instead, the report needs to determine the air quality impact in ppm of carbon monoxide from the additional vehicle trips and determine if it leads to a violation of the standards listed in Table 3.2-4.*

A.14-2

In our view, the Stratford School Draft EIR is deeply flawed and it comes to invalid conclusions. It has not adequately addressed the noise and air quality impact of the project on an ongoing basis and it does not satisfactorily address the safety and traffic issues for the neighborhood - and especially the children. When we are sorely in need of another elementary school it does not make sense to be bringing in a private school for which most of the neighborhood residents cannot or will not pay. We have a great local school system and we feel that our goal should be to support and expand it and not expand access for private schools. We would very strongly urge you to reject this whole project.

Thank you for your consideration.

Anindya and Preeti Ray

RESPONSE TO LETTER A14 – RAY

Response to Comment A14-1

This comment states concerns regarding existing traffic congestion and safety in the Birdland neighborhood and the associated challenges of walking and biking. The comment notes that the Apple Campus 2 may further exacerbate these concerns.

Please see Master Responses 1 and 2.

Comments from a Previous Letter

The commenter provides the same comments as provided by Wee-Lee Lim (Letter F).

The commenter is referred to Response to Comments F-1 through F-11.

Letter A.15

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

DEIR for the Stratford School Project

Lillian Gacusan Kwiatkowski . Wed, Nov 11, 2015 at 3:41 PM
To: mishijima@sunnyvale.ca.gov

Dear Ms. Ishijima,

Please consider the traffic and congestion that the Stratford School will bring to our neighborhood. Already cars are on the rise as people try to circumvent bad traffic on Lawrence Expwy. Once the Apple Campus opens to its thousands of employees, we will undoubtedly see more traffic in our neighborhood. Let's please not exacerbate the problem with adding traffic from a school. A.15-1

My four kids have attended the public schools in our area, Laurelwood, Peterson and Wilcox. They are excellent schools - we do not need a private school in the neighborhood. Furthermore, my kids have walked and biked and I know how hazardous it is for them already. I worry that this increase in traffic may be an added danger to kids making their way to and from school. A.15-2

Please, I highly urge you to consider the needs of the residents in our wonderful Sunnyvale neighborhood FIRST, before the desire of richer outsiders who want to send their students to an exclusive private school.

Sincerely,
Lillian Kwiatkowski
Quail Ave., Sunnyvale

RESPONSE TO LETTER A15– KWIATKOWSKI

Response to Comment A15-1

This comment expresses concerns regarding existing traffic congestion and cut-through traffic in the Birdland neighborhood. The comment notes that the Apple Campus 2 may further exacerbate these concerns.

Please see Master Responses 1 and 2.

Response to Comment A15-2

This comment states concerns regarding existing traffic congestion and safety in the Birdland neighborhood and the associated challenges of walking and biking.

Please see Master Response 2.

Letter A.16

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford School at Partridge

jmlongmire@gmail.com . Wed, Nov 11, 2015 at 4:11 PM
To: mishijima@sunnyvale.ca.gov

Dear Momoko Ishijima,

As a resident of the Birdland neighborhood I would like to express the following concerns related to the opening of the Stratford School at Partridge.

1. Increased traffic volume only to be exacerbated by opening of the Apple campus. Inverness is used as a cut-through by non-residents to avoid congestion on Homestead and Wolfe. A.16-1

2. Traffic speed along Inverness and other collector streets. Speeds are typically in excess of 30 mph. This is not only unsafe but contributes greatly to noise levels. I would urge the city to consider implementing speed control mechanisms (road narrowing, speed humps, additional stop signs, etc.) along our collector streets. A.16-2

Thank you very much for your consideration,

James Longmire
Homeowner
980 Inverness Way

RESPONSE TO LETTER A16 – LONGMIRE

Response to Comment A16-1

This comment states concerns regarding future traffic congestion and cut-through traffic in the Birdland neighborhood.

Please see Master Responses 1 and 2.

Response to Comment A16-2

This comment states concerns regarding traffic safety in the Birdland neighborhood, particularly as it relates to speeding.

Please see Master Response 2 regarding traffic safety.

Letter A.17

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford School traffic impact

Mary Sullivan Wed, Nov 11, 2015 at 4:13 PM
Reply-To: Mary Sullivan .
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

Dear Momoko Ishijima,
I realize you might not be aware of the action taking place in this small corner of Sunnyvale. Some is concerning Butcher's Corner as well as the Wolfe Road corridor (between Homestead Rd and El Camino), some is concerning Apple Spaceship office and Vallco Shopping area (technically in Cupertino). I have attended three meetings and was amazed that things are being considered, without a broad perspective. I hope I am not exhibiting NIMBA (not in my backyard) though I do live in the Ray-Nor Park neighborhood. The rapid building without considering the roads, residents and quality of life seems short sighted and sad. I am hoping you will consider bringing it to light with the councilmembers. A.17-1

I attended a evening informational meeting lead by Mr. Bennedict, a builder who is proposing a R-4 or R-3 project at Butcher's Corner. Community members spoke up against this for many reasons - especially the importance of following the "El Camino Precise Plan" Holly Lofgren sited and the currently overburdened roadways. Another meeting was to gather information for the Wolfe Road corridor, a traffic assessment (by Eileen Goodwin's group) of which the environmental impact study is negative with alarming accidents and injuries. Additionally, this school interest - Stratford School is looking to build a middle school on land the City of Sunnyvale sold without full public knowledge. This middle school of ~500 students, not counting staff traffic, with parents dropping off and picking up via Marion Way and the Birdland neighborhood would overburden the neighborhood roads (https://www.youtube.com/watch?v=Zyk84Q4k8Q8). This assessment of traffic is even before Apple spaceship opens and other Apple offices open down Wolfe Road near Central Expressway. It just seems that no one is considering the big picture once all these come to full capacity. A.17-2
I understand that City of Sunnyvale Councilmembers can disregard the environmental report and allow projects to more forward. Obviously this looks like a number of runaway trains rushing toward each other, with no over sight! The impact to residents and quality of life is short sighted and sad. I hope the people I voted to represent me and my family, will strongly consider my concerns.
Thank you,
M. Sullivan

RESPONSE TO LETTER A17 – SULLIVAN

Response to Comment A17-1

This comment questions whether the DEIR considered traffic impacts associated with nearby projects.

Please see Master Response 1.

Response to Comment A17-2

This comment questions whether the DEIR considered traffic impacts associated with nearby projects such as Butcher's Corner.

Please see Master Response 1.

Letter A.18

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

DEIR Stratford School Project

Michael Kurtz . Wed, Nov 11, 2015 at 4:26 PM
Reply-To: Michael Kurtz .
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

City Planner Momoko Ishijima,

I am writing you with some comments in response to the DEIR for Stratford/Raynor School. After reviewing this report, there are numerous concerns that my husband and I have as citizens of Sunnyvale.

It is clear that the full area of impact was not taken into consideration while measuring the traffic to and from this proposed Stratford/Raynor school location. The perimeter area created by the following streets was not fully researched. These streets are Wolfe, Homestead, Quail/Tantau, Lawrence Expwy, El Camino.
Also the increase in approximately 7500-10,000 vehicles traveling through these streets to the Apple Campus was not considered in both the increase traffic and air pollution in your study. This Apple campus has been in the planning and construction phase many years prior to the Stratford proposed campus. This is a big oversight in the study and needs to be addressed in a new DEIR. A.18-1

The Air Quality impact from the increase of 7500-10,000 vehicles from the Apple Campus along with the increase of 450-520 vehicles traveling to the proposed Stratford campus and idling for 20-30 minutes during morning drop off and afternoon pickup was not adequately measured. The students traveling into the Birdland community will be far above the stated number due to these students living outside the Birdland boundaries. With the demands on students today, very few will be walking or bicycling to the proposed Stratford school. Thus a much higher vehicle count needs to be reassessed in a new DEIR. A.18-2

Safety for all our children in Birdland and those that may be attending the proposed Stratford school was not fully assessed. A.18-3

The streets bordering Raynor School and Park have long been cited with dangerous speeding and lack of stop signs and slowing measures. Quail Avenue and Dunford have not been altered or fixed to address these longstanding safety concerns of the neighborhood. Also, the intersection of Dunford, Oriole, and Norman is an extremely dangerous intersection for pedestrians, bicyclists, and cars. This is a blind curve. A.18-4

Best regards,
Cynthia Kurtz

RESPONSE TO LETTER A18 – KURTZ

Response to Comment A18-1

This comment asserts that the DEIR is inadequate because it does not take into account the Apple Campus 2.

Please see Master Response 1.

Response to Comment A18-2

This comment questions the trip generation methodology in the DEIR and asserts that trips were underestimated.

Please see Master Response 2.

Response to Comment A18-3

This comment asserts that traffic safety issues were not adequately assessed in the DEIR.

Please see Master Response 2 regarding traffic safety.

Response to Comment A18-4

This comment expresses concerns regarding traffic safety in the Birdland neighborhood. The comment calls out Quail Avenue, Dunford Way, and the intersection of Dunford, Oriole, and Norman for their safety challenges for all modes.

Please see Master Response 2 regarding traffic safety.

Letter A.19

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Stratford School at Partridge Avenue - Draft EIR comments

1 message

Heather Chen . . Wed, Nov 11, 2015 at 4:39 PM
To: Momoko Ishijima <mishijima@sunnyvale.ca.gov>

Hi Momoko:
I have some concerns about the Draft EIR that was submitted for the Stratford School @ Patridge Ave project.

My main concerns for the project are:

1. The priority use of areas of Raynor park after local public school hours (after 1:20pm on Wednesdays and after 2:10pm on Mon, Tues, Thurs, Fri).
2. The traffic congestion and impact to pedestrians and bicyclists mostly during after school hours. A.19-1

Regarding item 1.
Appendix J takes a very unscientific approach to analyzing park use. It says that staff visited the park "3" times to get a sense of the use. After that, it also mentioned that park maintenance workers were interviewed to get their inputs on how much the park was used. They made judgements based on how much trash was generated and on observations made during mornings. This analysis is not comprehensive enough to make a judgement of how much Stratford's after school use will impact the availability of the park during the time period when many of the neighborhood kids would be using the fields. There probably more casual use of the park during the afternoon/evening than indicated by the observations in the Appendix. For example, during soccer season, there are often 3 or 4 teams practicing on the fields every day after 3 or 4pm. These teams do not reserve the field, but they use it because it is close by their homes. I feel that the priority reserved use of Raynor park during after school times (after 1:20pm on Wednesdays and after 2:10pm on Mon, Tues, Thurs, Fri) is an unreasonable allowance for a private institution. They should be allowed to use the park, but without priority reservations. A.19-2

Regarding item 2.
I am mostly concerned about the number of cars that will be waiting to pick up kids after school. After school pick up is notoriously inefficient because kids don't all come out at the same time and so the line of cars doesn't clear out as quickly as before school dropoff. Even though there is some room for vehicles onsite, there will be overflow onto Dunford ave. What is the policy for cars who can't fit in the onsite vehicle loop? They will simply block traffic along Dunford. While the school can ask people to carpool, it is difficult to require since kids all have different after school activities and need to go in different directions. I don't feel like the school will be very successful asking parents to make allowances for traffic. Many people choose private school because they are busy people, and they don't necessarily want to be told how to travel to and from school. A.19-3

These are my main concerns. I hope that these issues will be resolved before the use permit is approved.
Thank you.
Heather Chen on Quail Ave in Birdland.

RESPONSE TO LETTER A19 – CHEN

Response to Comment A19-1

The commenter states her concerns regarding the project including:

1. The priority use of areas of Raynor Park after local public school hours (after 1:20 PM on Wednesdays and after 2:10 PM on Mon, Tues, Thurs, Fri).

2. The traffic congestion and impact to pedestrians and bicyclists mostly during after school hours.

Responses to these concerns are discussed below.

Response to Comment A19-2

The commenter states that the park use analysis is not comprehensive enough to make a judgment of how much the proposed project after-school use will impact the availability of the park. The commenter continues and states that the priority reserved use of Raynor Park during after-school times (after 1:20 PM on Wednesdays and after 2:10 PM on Mon, Tues, Thurs, Fri) is an unreasonable allowance for a private institution. They should be allowed to use the park, but without priority reservations.

Please see response to Comment A13-2 above regarding data used in Section 3.12 Recreation.

The EIR analyzes the proposed project's physical impacts on the environment. Park availability itself is not a physical environmental impact that is analyzed in the EIR. For further discussion on the Joint Use Agreement, the commenter is referred to Master Response 4. Any physical impacts, like user displacement and increased wear and tear, are considered impacts under CEQA and thus are discussed in Section 3.12 Recreation.

Response to Comment A19-3

This comment states concerns regarding student pickup after school. The comment asserts that some spillover will occur onto Dunford Way due to insufficient queuing space.

The project would generate an estimated 135 trips in during the afternoon peak period after school ends. Based on traffic counts from the Stratford School De Anza campus, 52 trips in are expected to occur prior to school ending, and 55 trips are estimated to occur during the 15 minutes immediately after school ends. The proposed site plan accommodates up to 80 cars, including eight spaces for drop-off and 72 spaces for queuing.

Stratford School has proposed to station several staff at the drop-off area to facilitate efficient traffic flow, consistent with its approach at other campuses. Nevertheless, predicting vehicle queues is inherently uncertain, and it is possible that queues would occasionally spill over onto Dunford Way. If some queuing does occur on Dunford Way, there is sufficient queuing capacity on the south side of the street where parking would be prohibited. Stratford School would strive to minimize dwell times during drop-off to limit queues and would monitor spillover effects along Dunford Way.

Letter A.20

Momoko Ishijima <mishijima@sunnyvale.ca.gov>

My feedback on the "Draft Environmental Impact Report" - Stratford School at Partridge Avenue

1 message

Sesha Prasad Wed, Nov 11, 2015 at 7:36 PM
Reply-To: Sesha Prasad .
To: "mishijima@sunnyvale.ca.gov" <mishijima@sunnyvale.ca.gov>

Dear Momoko Ishijima,

I would like to provide my feedback regarding the proposed Stratford project at Partridge Avenue.

Before getting into the Environmental impact of the proposed Stratford School project, I must call your attention to the looming Apple Spaceship, that will likely draw hundreds of cars (if not more, given the 13 thousand seat building), trying to escape the Homestead/Wolfe signal lights, into our neighborhood. The cascading effect of the Apple Spaceship, Kaiser and the many new real estate developments along El Camino/Wolfe/Lawrence/Homestead will be increasingly felt in our neighborhood. A.20-1

We live at 1642 Peacock Avenue, one of the streets leading into our neighborhood, known to locals as Birdland and Birdcage. These neighborhood names derive from the street names and the high likelihood of gridlock within the residential neighborhood.

We celebrated Halloween recently and over 100 kids showed up for trick-or-treating. This given the evening time on a busy, broad avenue. These kids represent a cross section of our neighborhood who attend the local schools - Laurelwood Elementary, Peterson Middle school, Appleseed Montessori, Silicon Valley Academy, New concept Chinese school (preshcool) or Dynasty Academy (aftercare).

Our kids go to the excellent public schools, either walking, biking or getting dropped-off by a parent. We touch several intersections and street crossings enroute. Between 7:30 and 8:30 you can witness the contention for road space particularly along Inverness, Dunford, Teal, Bryant and Poplar. At some of the street crossing along these roads you can imagine the vulnerability of kids, particularly given their relatively smaller sizes and the impatient/distracted drivers that are quite apparent everywhere. Our neighbors have posted a few videos capturing this scene on Youtube. See this for example: https://www.youtube.com/watch?v=BsIDZ9mfeXQ

My feedback on the draft EIR for the proposed Stratford school project is informed by the above daily experience. This pertains to Air Quality Impact and Traffic Impact sections in the EIR.

* A new school meant to house 500+ students will add a lot more cars into this mix. I can for foresee the resulting congestion, chaos, aggression and potential exposure of our kids to not only the physical danger of more cars, but also the added exhaust emissions resulting from idling cars, waiting for their turn to pass each yard of pavement surface, adversely A.20-2

impacting air quality
* Raynor park is small enough, as it is. Dividing up a large chunk of it as priority use (particularly given how the basketball court is positioned), more than one-half of the park will be inaccessible to local kids and adults. Given, the park is also home to Soccer and baseball leagues among others. A.20-3
* Parents dropping kids off will invariably need to park for one reason or another and there just isn't enough parking real estate onsite. You can see this spilling onto neighborhood streets. A.20-4

In summary, this project does not appear to be in the best interest of Birdcage/Birdland/Raynor park neighborhood residents. It will adversely impact our quality of life, air quality, raise the noise thresholds, endanger children particularly those on foot or bikes and worsen the congestion. Many of the neighborhood streets just do not have the capacity for more cars. On top of this, the priority use agreement of Raynor park puts us all at a disadvantage.

I respectfully submit that the proposed Stratford project be NOT approved for this site. Stratford is an excellent school, but the location is just plain wrong. You will have a lot of unhappy school patrons, neighbors, potentially putting kids moving around into danger.

Best,
Sesha Narahari
1642 Peacock Ave
Sunnyvvale, CA

RESPONSE TO LETTER A20– NARAHARI

Response to Comment A20-1

This comment expresses concerns regarding anticipated traffic impacts from the proposed project and the Apple 2 Campus and other nearby projects.

Please see Master Response 1.

Response to Comment A20-2

The commenter states that the project will result in congestion, chaos, aggression, and potential exposure of our kids to not only the physical danger of more cars, but also the added exhaust emissions resulting from idling cars, waiting for their turn to pass each yard of pavement surface, adversely impacting air quality.

The commenter does not discuss the adequacy of the EIR. The commenter is referred to Master Responses 1, 2, 3 and 4.

Additionally, as noted in Section 3.2 Air Quality, the proposed project would not exceed air quality thresholds during project operation. Exposure to TACs was evaluated as a part of the air quality analysis. This analysis showed the project would result in a less than significant impact.

Response to Comment A20-3

The commenter states that more than one-half of the park will be inaccessible to local kids and adults by giving priority use to the proposed project.

The commenter does not discuss the adequacy of the EIR. Please see Section 3.12 regarding park impacts and park usage. Per the Joint Use Agreement, priority areas would be available to the public during priority use hours when not in use by Stratford.

Response to Comment A20-4

This comment expresses concerns regarding the project's parking supply.

Please see Response to Comment F-9.

Letter A21

BRUCE TICHININ, INC.
Bruce Tichinin
Attorney At Law
17150 Wedgewood Avenue
Los Gatos, California 95032
Telephone: (408) 429-8415
E-mail: tichinin@garlic.com
Web: www.brucetichininlaw.com

November 11, 2015

VIA EMAIL ONLY:

mishijima@sunnyvale.ca.gov

Momoko Ishijima, Associate Planner, City of Sunnyvale

Re: Draft EIR - Stratford School at Partridge Avenue

Dear Ms. Ishijima :

Kindly be advised that my office represents the Board of Directors of Save Sunnyvale Parks and Schools, Inc.

On their behalf, I offer the following comments on the above-referenced Draft EIR.

I.

THE DISCUSSION OF PROJECT ALTERNATIVES IS INADEQUATE.

A. The "Project without Joint Use Agreement Alternative" Is Improperly Rejected from Evaluation As an Alternative.

The Draft EIR (p. 4.0-37) describes this alternative, in relevant part, as one in which the *"proposed project would be constructed as described in ... [the] Project Description ... but would not include a joint use agreement. Stratford School would not have guaranteed use privileges of Raynor Park and would not be able to use the park during recess times or for physical education activities."* A21-1

The Draft EIR then states: *"[t]he proposed project **is dependent on park use**; this alternative renders the project **infeasible**."* (id., bolding and underlining added)

This analysis and conclusion is flawed.

State CEQA Guidelines §15126.6 governs the consideration and discussion of alternatives to a *"Proposed Project."* (*See:* title of subdivision (a) of §15126.6). In relevant part, it states:

"An an EIR shall describe a range of reasonable alternatives to the project ... which would feasibly attain the ***most basic objectives*** *of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."*

State CEQA Guidelines §15126.6 (a), bolding and underlining added.

A21-1

Nothing in the list of *"Project Objectives"* (Section 2.2, p. 2.0-13) includes any use, guaranteed or otherwise, of the park by Stratford Schools. Moreover, nothing in the above-quoted Draft EIR description of this *"Project without Joint Use Agreement Alternative"* in any way inhibits or interferes, in any form by any person, with *"park use,"* so that the purported reason for rejecting the alternative as allegedly "infeasible" (i.e. dependency on park use) simply does not exist in fact. The attempt of the Draft EIR to reject the Alternative on such basis is crude sophistry, i.e. *"subtly deceptive argumentation or reasoning."* (Miriam-Webster Dictionary)

Moreover, because eliminating the Joint Use Agreement would eliminate the necessity for the new basketball court, this Alternative would eliminate the necessity for destroying any trees on site, and would thus *"avoid or substantially lessen a ... significant effect of the project,"* and clearly *"feasibly attain ... [the] basic objective of the project"* of *"[p]reser[ving] healthy trees on-site to the maximum extent feasible,"* thus meeting the criteria for treatment under §15126.6 (a) as one of the alternatives to be discussed in this EIR in which such tree preservation is one of the listed *"Project Objectives"* in Section 2.2 of the Draft EIR.

Accordingly, it is requested that this Alternative be included in the range of reasonable alternatives to the project that is described, and whose comparative merits

are evaluated against those of the project as proposed and the other alternatives discussed. A21-1

B. <u>The School Project Proposals of the Other Bidders for the Raynor Activity Site Were Improperly Omitted from the Alternatives Discussion</u>.

German International School of Silicon Valley, Los Altos School District, Morgan Autism Center and Fremont Union High School District all submitted genuine bids, in competition with Stratford Schools, Inc., to use the project site for a school.

Thus, facially, each of their proposals falls within the *range of reasonable alternatives"* to the subject project which would *"feasibly attain most of the basic objectives of the project,"* so as, in any good faith approach to CEQA compliance for this project, merit being examined for whether they *"would avoid or substantially lessen any of the significant effects of the project"* as proposed for Stratford Schools, Inc. A21-2

Failure to include each of them as an alternative described and evaluated in the EIR as being within the *"reasonable range of alternatives"* for which discussion is required under §15126.6 is a failure to comply with CEQA, absent some articulated factual basis for concluding, based on contents of these alternative bids, that any one of them not included in the alternatives discussion would <u>not</u> *"avoid or substantially lessen any of the significant effects of the project"* as proposed by Stratford Schools, Inc. In fact, unless any of these bids show an intention to destroy mature trees - as does the project as by Stratford, each of them meets the criterion for being included in the alternatives discussion under §15126.6 of avoiding or substantially lessening the significant effect of destroying the mature trees that Stratford's proposal will.

It is requested that the Section 4.0 Alternatives discussion be corrected as proposed above.

Respectfully yours,

BRUCE TICHININ

cc: Board of Directors of Save Sunnyvale Parks and Schools, Inc.

RESPONSE TO LETTER A21– SAVE SUNNYVALE PARKS AND SCHOOLS INC.

Response to Comment A21-1

The commenter notes that the project alternative without joint use agreement was improperly rejected.

CEQA Section 15126.6 (a) states that an EIR need not consider every available conceivable alternative and that "an EIR is not required to consider alternatives which are infeasible." Schools are meant to serve as educational centers, which also provide recreational opportunities. Based on available models for existing schools, a school without available outdoor space would not be a place that would foster the type of educational opportunities the City wants to accomplish through its project objectives. Any physical impacts related to increased usage of Raynor Park are discussed in the Draft EIR. Please also see Master Response 3 regarding Alternatives and Master Response 4 regarding the Joint Use Agreement.

Response to Comment A21-2

The commenter requests that other development proposals for the site be included in the range of reasonable alternatives.

As noted above, CEQA Section 15126.6 (a) states that an EIR need not consider every conceivable alternative to a project. The Draft EIR analyzes the project application submitted to the City, and alternatives that would meet most of the project objectives and reduce or avoid the project's environmental impacts. Alternatives were selected to foster informed decision-making and to help decision makers understand project impacts. CEQA does not require that every other potential development proposal for the site be analyzed as an alternative.

CEQA Section 15126.6 (a) also states that "there is no iron clad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." The rule of reason is described in Section 15126.6 (f), and Section 15126.6 (f) (3) states that "an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whole implementation is remote and speculative." The range of alternatives selected present alternatives whose effects could be inferred based on available data and that were found to be feasible alternatives to the proposed project.

Section 15126.6 (a) also states that the lead agency is responsible for selecting a range of alternatives and that an explanation of the selection process must be included in the EIR. The City of Sunnyvale, as the lead agency, selected the range of alternatives, and the Draft EIR adequately explains why each alternative was selected or rejected. As such, the Draft EIR meets CEQA requirements for alternatives and no change is needed.

Letter A-22

November 9, 2015

Stratford School Draft EIR Public Hearing

Sunnyvale Planning Commission

Public Comments

1. Denise Delange – not a lot in DEIR you can argue about, results are results. Finding to revisit Alternative 3 would result in a significant and unavoidable traffic impact at Lawrence and Benton. Assumptions are inaccurate, adult school serving residents – they wouldn't be coming through that intersection. Residents wouldn't be travelling through that intersection. Other alternatives to review. Multiple bidders on property – other bidders should be reviewed as alternatives. Not the best project for site because of traffic from outside the neighborhood (than a neighborhood school). Noise, pollution, traffic congestion, safety are main concerns. Loss of trees and loss of use of park. A22-1

2. Henry Alexander – lives on the corner of Marion where it becomes Dunford. Traffic cuts through neighborhood to avoid traffic on main routes. President of Raynor Park Neighborhood Association. Many safety concerns. Have discussed concerns with the City. EDF says problems with idling cars – pollution, bad for health, serious illnesses. No plans to calm traffic. A22-2

RESPONSE TO LETTER A22 – PLANNING COMMISSION PUBLIC MEETING

Response to Comment A22-1

Commenter notes that assumptions regarding significant and unavoidable impact at Lawrence and Benton for Alternative 3 are inaccurate. The commenter requests that other alternatives be reviewed for the project site and that noise, pollution, traffic congestion, safety, and loss of park space are of main concern.

Please see Response to Comment P2-1. Please refer to Master Responses 1, 2 and 3. Additionally, as noted in Section 3.2 Air Quality, the project would not exceed air quality thresholds during project operation. Exposure to TACs was evaluated as a part of the air quality analysis. This analysis showed the project would result in a less than significant impact.

Response to Comment A22-2

The commenter states general concerns with the project as reflected in his comment letter.

Please see response to Comment Letter T.

3.0 Amendments to the Draft EIR

3.1 AMENDMENTS TO THE DRAFT EIR

In the revised text below, please note that additions are underlined and deletions are shown in ~~strikeout~~.

EXECUTIVE SUMMARY

Page ES-4, last paragraph, sentence has been changed to the following:

Throughout the Draft EIR, the terms "project" and "proposed project" are used to refer to the ~~structure's demolition~~ project development.

ENVIRONMENTAL ANALYSIS

Section 3.7 Hazardous Materials

Page 3.7-27, last paragraph

Adherence to existing federal, state, and local regulations regarding the handling, transport, and disposal of hazardous materials, as well as implementation of mitigation measures **MM 3.7.2a** through **MM 3.7.2d**~~e~~

Section 3.14 Recreation

Page 3.12-13 5th paragraph first sentence has been changed to the following:

Based on field observations and personal communications with park staff most of casual park use takes place after ~~3:00~~ 6:00 pm on weekdays and weekend days.

This page is intentionally left blank.

APPENDICES

Appendix A: Mitigation and Monitoring Reporting Plan

STRATFORD SCHOOL AT PARTRIDGE AVENUE FINAL EIR APPENDIX A – MITIGATION

1. STATUTORY REQUIREMENT

When a lead agency makes findings on significant environmental effects identified in an environmental impact report (EIR), the agency must also adopt a "reporting or monitoring program for the changes to the project which it has adopted or made a condition of approval in order to mitigate or avoid significant effects on the environment" (Public Resources Code Section 21081.6(a) and California Environmental Quality Act Guidelines Section 15091(d) and Section 15097). The Mitigation Monitoring and Reporting Program (MMRP) is implemented to ensure that the mitigation measures and project revisions identified in the EIR are implemented. Therefore, the MMRP must include all changes in the proposed project either adopted by the project proponent or made conditions of approval by the lead agency or a responsible agency.

2. ADMINISTRATION OF THE MITIGATION MONITORING AND REPORTING PROGRAM

The City of Sunnyvale (City) is the lead agency responsible for the adoption of the MMRP. Stratford School is the project applicant and is responsible for implementing, verifying, and documenting compliance with the MMRP, in coordination with other identified agencies. According to CEQA Guidelines Section 15097(a), a public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation. However, until mitigation measures have been completed, the lead agency remains responsible for ensuring that implementation of the measures occurs in accordance with the program.

Verification of mitigation compliance and responsibility for compliance is the responsibility of the applicant–designated project manager. The project manager will be responsible for coordinating plan reviews and field verification with the appropriate City department staff or outside agencies.

3. MITIGATION MEASURES AND REPORTING PROGRAM

Table 1 is structured to enable quick reference to mitigation measures and the associated monitoring program based on the environmental resource. The numbering of mitigation measures correlates with numbering of measures found in the Impact Analysis chapters of the Draft EIR.

TABLE 1
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Requirements of Measure	Compliance Method	Verification/Timing	Responsible Party
Air Quality				
MM 3.2.1a	During construction activities, the applicant and/or its contractor shall ensure that all off-road diesel-fueled equipment (e.g., rubber-tired dozers, graders, scrapers, excavators, asphalt paving equipment, cranes, and tractors) is California Air Resources Board (CARB) Tier 3 Certified or better.[1]	• Equipment inspection	• Preconstruction and during construction	• Project manager
MM 3.2.1b	Prior to the issuance of grading or building permits, the City of Sunnyvale shall ensure that the Bay Area Air Quality Management District's (BAAQMD) Basic Construction Mitigation Measures are noted on the construction documents. These basic construction mitigation measures include the following: 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. 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.	• Construction plan approval	• Preconstruction	• City of Sunnyvale

[1] NO_x emissions are primarily associated with use of diesel-powered construction equipment (e.g., graders, excavators, rubber-tired dozers, tractor/loader/backhoes). The Clean Air Act of 1990 directed the EPA to study, and regulate if warranted, the contribution of off-road internal combustion engines to urban air pollution. The first federal standards (Tier 1) for new off-road diesel engines were adopted in 1994 for engines over 50 horsepower and were phased in from 1996 to 2000. In 1996, a Statement of Principles pertaining to off-road diesel engines was signed between the EPA, CARB, and engine makers (including Caterpillar, Cummins, Deere, Detroit Diesel, Deutz, Isuzu, Komatsu, Kubota, Mitsubishi, Navistar, New Holland, Wis-Con, and Yanmar). On August 27, 1998, the EPA signed the final rule reflecting the provisions of the Statement of Principles. The 1998 regulation introduced Tier 1 standards for equipment under 50 horsepower and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. As a result, all off-road, diesel-fueled construction equipment manufactured in 2006 or later has been manufactured to Tier 3 standards.

Mitigation Measure	Requirements of Measure	Compliance Method	Verification/Timing	Responsible Party
	4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph). 5. 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. 6. All construction equipment shall be maintained and properly tuned in accordance with manufacturers' specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. **7.** 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 BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.			
Biological Resources				
MM 3.3.1	**Nesting Bird Preconstruction Surveys.** If clearing and/or construction activities will occur during the raptor or migratory bird nesting season (February 15–August 15), the applicant and/or its contractor shall retain a qualified biologist to conduct preconstruction surveys for nesting birds up to 14 days before construction activities. The qualified biologist shall survey the construction zone and a 500-foot buffer surrounding the construction zone to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds. Surveys shall be repeated if project activities are suspended or delayed for more than 15 days during nesting season. If active nest(s) are identified during the preconstruction survey, a qualified biologist shall establish a 100-foot no-activity setback for migratory bird nests and a 250-foot setback for raptor nests. No ground disturbance should occur within the no-activity setback until the nest is deemed inactive by the qualified biologist.	• Preconstruction surveys for work done between February 15 and August 15	• Up to 14 days prior to construction	• Project manager • City

Mitigation Measure	Requirements of Measure	Compliance Method	Verification/Timing	Responsible Party
Cultural Resources				
MM 3.4.2	If during the course of grading or construction unknown archeological and paleontological resources are discovered, the contractor shall halt work immediately within 20 feet of the discovery, the City of Sunnyvale shall be notified, and a professional archaeologist, who meets the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology, or paleontologist shall be retained to determine the significance of the discovery. A qualified professional shall determine impacts, significance, and mitigation in consultation with recognized local Native American groups, if appropriate. In addition, prior to the commencement of project site preparation, all construction personnel shall be informed of the potential to inadvertently uncover cultural resources and the procedures to follow subsequent to an inadvertent discovery of cultural resources.	• Site inspection	• During construction	• Project manager • City of Sunnyvale • Qualified archaeologist
Hazards and Hazardous Materials				
MM 3.7.2a	Prior to construction, the applicant shall implement an Operations and Maintenance Plan. The plan shall include measures which would ensure that the assessment, repair, and maintenance of damaged materials within the buildings shall be done in a manner to protect the health and safety of workers and building occupants as described in applicable state and local regulations. If necessary, the applicant shall retain a Division of Occupational Safety and Health (Cal/OSHA) registered asbestos contractor to remove asbestos-containing materials to ensure safety to the surrounding neighborhoods.	• Review of Operations and Maintenance Plan	• Prior to construction	• Project manager • City of Sunnyvale
MM 3.7.2b	Prior to construction, the applicant shall consult with a certified lead risk assessor to determine options for control and correction of lead-based paint hazards. If lead-based paints are found to be present, to prevent accidental release of lead-based paint, the applicant and/or its contractor shall use the following techniques during construction: • Stabilize loose and flaky paint prior to construction activities.	• Site inspection	• Prior to construction • During construction	• Project manager • Contractor • Certified Lead Risk Assessor

Mitigation Measure	Requirements of Measure	Compliance Method	Verification/Timing	Responsible Party
	• Require all workers to wear OSHA-level protective material for handling lead-based paint per OSHA requirements for lead in construction. • Remove all lead-based paint materials to a scrap yard or landfill that can accept such materials.			
MM 3.7.2c	If project construction includes removing existing site improvements that would expose unimproved areas, the applicant shall contact the local planning or other applicable oversight agency department to determine whether sampling relating to the former agricultural use of the subject property is required prior to construction activities. Sampling activities shall take place as directed by the applicable oversight agency.	• Site inspection	• Prior to construction	• Project manager • City of Sunnyvale
MM 3.7.2d	If hazardous materials are encountered during construction or accidentally released as a result of construction activities, the contractor shall implement the following procedures: • Stop all work in the vicinity of any discovered contamination or release. • Identify the scope and immediacy of the problem. • Coordinate with responsible agencies (Department of Toxic Substances Control, Central Coast Regional Water Quality Control Board, or EPA). • Conduct the necessary investigation and remediation activities to resolve the situation before continuing construction work.	• Site inspection	• During construction	• Project manager • Contractor
Transportation				
MM 3.14.1a	To reduce the conflict point in the drive aisle between the two southern parking lots and to improve the efficiently of the drop-off/pick-up loop, the project applicant shall restrict project site access at the Partridge Avenue driveway to only allow outbound travel during drop-off/pick-up times. The applicant shall place a sign indicating no left or right turns into the parking lot from Partridge Avenue during the specified drop-off and pick-up times on the school property and the public right-of-way to enforce the one-way operation of the driveway.	• Site inspection	• Project operation	• Project applicant

Mitigation Measure	Requirements of Measure	Compliance Method	Verification/Timing	Responsible Party
MM 3.14.1b	To improve pedestrian circulation and visibility at the Partridge Avenue driveway, the project applicant shall construct a curb extension at the northern end of the driveway as shown on **Figure 3.14-12a**. Additionally, the project applicant shall install an ADA-compliant raised crosswalk across the driveway to facilitate a continuous and direct extension of the sidewalk. The driveway exit shall include a stop sign and stop bar to clearly delineate the right-of-way.	• Site inspection	• During construction	• Project manager • City of Sunnyvale
MM 3.14.1c	The project applicant shall implement the following enforcement strategies: • Provide at least three staff stationed throughout the project site to facilitate drop-off/pick-up procedures: one along the northern parking lot; one adjacent to the drop-off/pick-up area, and one at the Partridge Avenue driveway. • Install a "no stopping/passenger loading" sign along the northern parking lot. • Restrict passenger loading on Dunford Way and Partridge Avenue during peak drop-off and pick-up times. • Discourage parking in the neighborhood through communication with parents and students. • Encourage carpooling, walking, and biking to school, to the extent feasible.	• Site inspection	• Project operation	• Project applicant
MM 3.14.1d	The project applicant shall continually monitor circulation around the immediate area and work with the City and community to identify and resolve issues as appropriate and reasonable. Additionally, the project applicant shall continue to actively communicate with parents about drop-off/pick-up procedures.	• Site monitoring	• Project operation	• Project applicant

Mitigation Measure	Requirements of Measure	Compliance Method	Verification/Timing	Responsible Party
MM 3.14.5a	The project applicant shall install sharrows on Dunford Way between Wolfe Road and the eastern city limits per California Manual on Uniform Traffic Control Devices (CA MUTCD) to clearly delineate Dunford Way as a bike route and increase driver awareness of possible bicyclists on the road (shown in **Figure 3.14-12b**).	• Site Inspection	• During Construction	• Project applicant • City of Sunnyvale
MM 3.14.5b	The project applicant shall fund the City's engineering study to determine the need for the installation of crosswalks and yield signs as shown in **Figure 3.14-13**. If the engineering study finds that crosswalks and yield signs are warranted, the applicant shall fund the installation of crosswalks and yield signs. Additionally, the applicant shall fund the installation of advance school warning signs in both directions along Dunford Way and Partridge Avenue along the school's frontage. The signs will be SW 24-1 (CA) signs as defined by the California Manual on Uniform Traffic Control Devices (MUTCD).	• Site inspection and monitoring	• Project operation	• Project applicant • City of Sunnyvale

This page is intentionally left blank.