



**CITY OF LOS ALTOS
CITY COUNCIL MEETING
June 9, 2015**

DISCUSSION ITEM

Agenda Item # 6

SUBJECT: Receive an update on the Blach Neighborhood Traffic Study; and direct staff regarding intersection improvements at Miramonte Avenue and Covington Road

BACKGROUND

In 2010/2011, a traffic study was conducted by Fehr & Peers, Transportation Consultants, to review traffic safety and the flow of traffic for the greater Blach Intermediate School (Blach) neighborhood. The study focused on the safety of students traveling to and from Blach. Additional areas for review were: improvements at the intersection of Miramonte Avenue and Covington Road; no-turn restrictions on Eastwood Drive; and the trial no stopping restrictions and permit parking program behind Blach at Carmel Terrace and Altamead Drive.

The study recommended projects to improve safety, which were separated into three tiers (Attachment 1). These projects were also considered during the development of the Pedestrian Master Plan. Three projects from Tier 1 were originally programmed into the Capital Improvement Plan: Miramonte Avenue/Covington Intersection Improvements; Covington Class I Pathway; and Carmel Terrace Class I Pathway. The original improvements recommended for the intersection of Miramonte Avenue and Covington Road included building out the corners to improve pedestrian and bicycle refuge, add a crosswalk across the north leg of the intersection and to install a traffic signal. Based on public feedback, however, the City Council at its May 22, 2012 meeting, directed staff to proceed with the improvements at the intersection without a traffic signal.

On January 8, 2013, the City Council approved a design at the intersection of Miramonte Avenue and Covington Road, which improves pedestrian safety by constructing City standard curbs and gutters, pedestrian ramps and enhanced crosswalk striping. The intersection will remain a four-way stop. The existing vehicle queues are expected to remain the same with this design.

The design for the intersection improvements is complete. Per the Council's request, outreach to the Blach PTA and the four immediate property owners at the intersection were completed during the design phase.

The improvements will also accommodate a Class I Pathway from the intersection to Covington School, which is currently in conceptual design. Both projects were identified as Tier 1 priority projects in the 2011 Blach Neighborhood School Traffic Study.

EXISTING POLICY

None

PREVIOUS COUNCIL CONSIDERATION

January 4, 2011; February 14, 2012; May 22, 2012; January 8, 2013

DISCUSSION

The intersection improvements were originally scheduled to be constructed in the summer of 2014; however, the recent relocation of Bullis Charter School (BCS) and the potential traffic impacts to the intersection and Blach Intermediate School area brought additional concern to the design, construction and traffic impact of the intersection and neighborhood.

On February 28, 2014, Los Altos School District (LASD) released for public review a Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Final Facilities Offer to BCS. On March 20, 2014, the City provided comments to the IS/MND (Attachment 2).

On March 31, 2014, LASD presented responses to comments to the IS/MND to the Los Altos School District Board. At this meeting, the Board accepted the responses and approved the IS/MND. The City was made aware of this approval on May 16, 2014 through email correspondence with LASD.

On December 19, 2014, LASD released a Notice of Preparation (NOP) for an environmental impact report for the expansion of BCS. The project includes expanding the enrollment of BCS by 191 students, which includes six (6) new portables at Egan Jr. High School, nine (9) new portables at Blach Jr. High School, and relocating the private Stepping Stones Preschool from Blach Intermediate School to Covington Elementary School. The City provided comments to the NOP on January 20, 2015 (Attachment 3).

In March 2015, LASD released a draft environmental impact report (EIR) in conformance with the California Environmental Quality Act (CEQA). An EIR must be prepared to fully describe the environmental effects of a project, identify mitigation measures to lessen or eliminate adverse impacts, and examine feasible alternatives to the project. The City provided comments to the EIR on April 20, 2015 (Attachment 4).

Key Traffic Concerns

Contributing Traffic Factors

The level of service performance at any intersection depends on several factors, but primarily is dependent on the volume of traffic and the type of traffic controls at the intersection. These factors influence the amount of time a motorists is waiting to pass through an intersection.

In the area around Blach, traffic restrictions were implemented in previous years that have contributed to the volume of traffic and may have affected the level of service performance at Miramonte Avenue and Covington Road:

- Eastwood Neighborhood Traffic Management Process – Initiated in 2003 by residents of Eastwood Drive to address cut-through traffic and speed on Eastwood Drive. This process resulted in a right-turn restriction of northbound right turns from Miramonte Avenue onto Eastwood Drive during school drop-off times (7:00 AM to 10:00 AM).

Receive an update on the Blach Neighborhood Traffic Study; and direct staff regarding intersection improvements at Miramonte Avenue and Covington Road

- Altamead Drive/Carmel Terrace Neighborhood Traffic Management Process – Initiated in 2006 by Altamead Drive/Carmel Terrace residents to address vehicular circulation and pedestrian and bicycle safety during school drop off periods. This process resulted in a one-year trial of a residential parking permit program and no stopping restriction during the morning drop-off period (7:00 AM – 10:00 AM).

The restrictions above effectively move the vehicular school traffic through this intersection; thus contributing to the intersections overall delay during the school commute hours.

Miramonte Avenue/Covington Road – City Analysis

The intersection of Miramonte Avenue and Covington Road is currently controlled by a four way stop. For a stop controlled intersection, the City’s Circulation Element evaluates the Level of Service (LOS) based on total average delay. Total average delay is defined as the delay, in seconds, experienced per vehicle.

In 2012, the City performed an LOS analysis of existing intersection performance. Analysis conformed to the Highway Capacity Manual calculation methods and was performed using Synchro modeling software. The average intersection LOS was F with a 141 total average delay. Additionally, all approaches to the intersection performed at LOS F. The critical vehicle queue length was 506 feet (northbound Miramonte Avenue).

LOS analysis was also performed with a signal at the intersection. The average LOS was B with a total average delay of 20 seconds. The critical queue length was 220 feet (northbound Miramonte Avenue). At its May 22, 2012, the City Council meeting, decided not to proceed with the installation of a traffic signal.

Miramonte Avenue/Covington Road – LASD Analysis

The EIR analyzed four (4) scenarios; Existing, Existing + Proposed Project, 2020 Cumulative Baseline, and 2020 Cumulative + Proposed Project. Analysis conformed to the Highway Capacity Manual calculation methods and was performed using Traffix modeling software.

In the Existing + Proposed Project scenario, the EIR identifies that the additional trips generated from the project would worsen the performance of the intersection from LOS D to LOS F, which is considered a significant impact. To mitigate this impact, the EIR recommends that the City install a traffic signal at this intersection. In the City’s EIR comment letter, it states that LASD should pay for the signal improvement to mitigate the project’s impacts or contribute to future signal improvements if the City is not ready for implementation. LASD should also conduct outreach to the surrounding neighborhood regarding the required mitigation.

Miramonte Avenue/Covington Road – Intersection Design

As stated above, the design of pedestrian safety improvements are complete. Staff was concerned about constructing the planned improvements to only have them removed to accommodate a traffic signal as required by the EIR, causing additional construction impacts to the neighborhood.

Receive an update on the Blach Neighborhood Traffic Study; and direct staff regarding intersection improvements at Miramonte Avenue and Covington Road

Staff is seeking direction on whether to proceed with the planned pedestrian improvements, revise the current intersection design to include full traffic signal improvements, or revise the design to include appurtenances such as traffic signal conduit to accommodate a future traffic signal.

If the Council elects to revise the intersection design, staff recommends LASD conduct the necessary outreach to the surrounding neighborhood regarding the required mitigation; as well as, provide funding for the traffic signal construction.

PUBLIC CONTACT

Posting of the meeting agenda serves as notice to the general public.

FISCAL/RESOURCE IMPACT

None

ENVIRONMENTAL REVIEW

Categorically Exempt pursuant to CEQA Section 15061 (b) (3)

RECOMMENDATION

Receive an update on the Blach Neighborhood Traffic Study; and direct staff regarding intersection improvements at Miramonte Avenue and Covington Road

ALTERNATIVES

1. Proceed with current design and construct improvements
2. Modify the intersection design to include traffic signal appurtenances
3. Modify the intersection design to include full traffic signal improvements

Prepared by: Cedric Novenario, Transportation Services Manager

ATTACHMENTS:

1. Blach Neighborhood Traffic Study – Tier 1-3 Priority Tables
2. Initial Study/Mitigated Negative Declaration-Final Facilities Offer to Bullis Charter school for 2014-2015 – Los Altos Comments
3. Notice of Preparation of an Environmental Impact Report for the Provision of Facilities for Bullis Charter School (2015-2016 to 2018-2019) – Los Altos Comments
4. Bullis Charter School Draft Environmental Impact Report (2015-2016 to 2018-2019) – Los Altos Comments

Receive an update on the Blach Neighborhood Traffic Study; and direct staff regarding intersection improvements at Miramonte Avenue and Covington Road

**TABLE 5
 TIER ONE IMPROVEMENTS SUMMARY**

LOCATION	RECOMMENDATION	CONCERN ADDRESSED	COST ESTIMATE
Covington Road	<ul style="list-style-type: none"> Provide Class I path on south side 	<ul style="list-style-type: none"> Separates bicycle and pedestrian traffic from vehicle traffic. Wrong way bicycle riding and scooting. 	\$276,000
Covington Road/ Miramonte Avenue	<ul style="list-style-type: none"> Install 2-phase traffic signal. Add crosswalk across north leg. Add advanced stop bars. Build out corners to improve pedestrian and bicycle storage areas. Rest signal in all-red during off-peak times. 	<ul style="list-style-type: none"> Improve traffic flow and reduce vehicular delay. Improve intersection right-of-way control and driver yielding. Batch pedestrian crossings. Resting in all-red reduces potential for speeding through the intersection on major street approaches. 	\$150,000 for signal \$1,500 for crosswalk striping \$2,200 for advanced stop bars \$20,000 for corner improvements
Altamead Drive	<ul style="list-style-type: none"> Add shoulder stripe or bike lanes between Grant Road and Carmel Terrace 	<ul style="list-style-type: none"> Narrow travel way for vehicular traffic, encouraging reduced speeds. Delineate area for bicycle travel. Provide connection to Blach, MVHS, and Miramonte School. 	\$18,900
Portland Avenue/ Buckingham Drive	<ul style="list-style-type: none"> Relocate stop bar on Buckingham Drive to behind pedestrian crossing 	<ul style="list-style-type: none"> Vehicles currently travel through crossing area before stopping, creating a potential conflict with pedestrians 	\$400
Source: Fehr & Peers, December 2010. Cost estimates include 40% markup for design, traffic control and mobilization, and contingencies.			

Tier 2: Medium-Priority Improvements

The second level of improvements, those that have a mid-range impact on student safety and circulation, are recommended as part of Tier 2. These infrastructure improvements address the next level of circulation issues and concerns, and complement the improvements identified in Tier 1. Before Tier 2 improvements are implemented, it is recommended that the City assess the efficacy of the Tier 1 improvements, and consider reprioritizing the Tier 2 and Tier 3 improvements. Tier 2 improvements are detailed below.

**TABLE 6
 TIER TWO IMPROVEMENTS SUMMARY**

LOCATION	RECOMMENDATION	CONCERN ADDRESSED	COST ESTIMATE
Miramonte Avenue	<ul style="list-style-type: none"> Extend east side sidewalk from Eastwood Drive to Covington Road At Portland Avenue, bulb out the southeast corner and add advanced stop bars 	<ul style="list-style-type: none"> Provide space for pedestrians to walk Provide queuing area for pedestrian traffic 	\$89,000 for sidewalk \$21,000 for corner improvements
Eastwood Drive	<ul style="list-style-type: none"> Tighten corner radii at Miramonte Avenue and Covington Road Add shoulder stripe or bike lanes 	<ul style="list-style-type: none"> Slows vehicle speeds entering Eastwood Drive Provide space for bicyclists, slow vehicle speeds 	\$50,000 for corner improvements \$14,600 for striping
Blach Intermediate School Entrance	<ul style="list-style-type: none"> Tighten corner radius at western driveway on Covington Road Widen sidewalk on west side of parking lot 	<ul style="list-style-type: none"> Slow vehicles turning onto school property Improve circulation for students walking onto campus 	\$21,000 for corner improvements \$24,900 for sidewalk
Altamead Drive	<ul style="list-style-type: none"> Enhance existing crosswalk at Miramonte School with high visibility striping and signing, add refuge island, and provide ADA-compliant curb ramps 	<ul style="list-style-type: none"> Improves visibility of existing crosswalk Median serves dual purpose of pedestrian refuge and traffic calming device Curb ramps provide accessible crossing 	\$7,600 for crosswalk \$17,500 for median \$8,700 for ramps
Covington Road/ Grant Road	<ul style="list-style-type: none"> Add advanced stop bars 	<ul style="list-style-type: none"> Discourages vehicle encroachment into crosswalk 	\$1,100
Portland Avenue/ Runnymede Drive	<ul style="list-style-type: none"> Install high visibility crosswalk Extend median through Runnymede/McKenzie 	<ul style="list-style-type: none"> Provide crossing opportunity serving Heritage Oaks Park Median serves dual purpose of pedestrian refuge and traffic calming device, improves visibility of /protection of tree 	\$7,600 for crosswalk \$21,700 for median

Source: Fehr & Peers, December 2010.
 Cost estimates include 40% markup for design, traffic control and mobilization, and contingencies.

Tier 3: Low-Priority Improvements

The third level of improvements includes those that have a long-range impact on student safety and circulation. These infrastructure improvements address the next level of circulation issues

and concerns, and installation of the improvements identified in Tiers 1 and 2. Before Tier 3 improvements are implemented, it is recommended that the City assess the efficacy of the prior improvements, and consider reprioritizing those remaining. Tier 3 improvements are detailed below.

TABLE 7 TIER THREE IMPROVEMENTS SUMMARY			
LOCATION	RECOMMENDATION	CONCERN ADDRESSED	COST ESTIMATE
Miramonte Avenue	<ul style="list-style-type: none"> • At Berry Avenue, install high visibility crosswalk with: <ul style="list-style-type: none"> ○ Median refuge island ○ Advanced pavement legends and signage ○ Pole-mounted pedestrian-actuated flashing beacon 	<ul style="list-style-type: none"> • Channels pedestrians from Berry to east side of Miramonte Avenue, with existing sidewalk • Median provides traffic calming benefits • Provides connection to Class I path on Berry Avenue 	\$10,800 for striping \$17,500 for median \$3,800 for advance signs and markings \$8,700 for beacon
Portland Avenue/ Buckingham Drive	<ul style="list-style-type: none"> • Consider reconfiguring the intersection per Exhibit 8 	<ul style="list-style-type: none"> • Vehicles traveling through pedestrian path 	\$8,400
Eastwood Drive	<ul style="list-style-type: none"> • Add traffic circles at Muir Way and Eastwood Court 	<ul style="list-style-type: none"> • Slow vehicle traffic to minimize conflicts with bicycles 	\$33,600
Grant Road/ Portland Road	<ul style="list-style-type: none"> • Work with Mountain View to evaluate potential signalization 	<ul style="list-style-type: none"> • Reduce cut through traffic on Carmel Terrace/ Altamead Drive 	\$15,000 for study
Source: Fehr & Peers, December 2010. Cost estimates include 40% markup for design, traffic control and mobilization, and contingencies.			



**Community Development Department
One North San Antonio Road
Los Altos, California 94022**

March 20, 2014

Randy Kenyon
Los Altos School District
201 Covington Road
Los Altos, CA 94024

**RE: Initial Study/Mitigated Negative Declaration
Final Facilities Offer to Bullis Charter School for 2014-2015**

Dear Mr. Kenyon:

Thank you for providing the City of Los Altos with the Notice of Intent to Adopt a Mitigated Negative Declaration for the Final Facilities Offer to Bullis Charter School for 2014-2015. After reviewing the Initial Study/Mitigated Negative Declaration (IS/MND), the City is unclear about how the BCS school schedule for a typical day would work and is concerned that the project will result in a significant impact to the intersection at Miramonte Avenue and Covington Road. Below is a list of the City's questions and comments:

BCS School Schedule

The description of how the students will be distributed between the Egan and Blach campuses on a typical day is unclear and needs to be better defined. Specifically:

- How many days in the school year will there be 445 students at the Egan campus and 266 students at the Blach campus?
- If the student rotation is going to be utilized between the campuses, it needs to be better quantified and defined.
- If necessary, provide a week-by-week breakdown of the number of BCS students that will be at each campus.

Specific information about the BCS school schedule is necessary to ensure that the potential traffic impacts are correctly quantified and mitigated.

Traffic and Circulation Impacts

As described, the project will result in a potentially significant impact to the level of service (LOS) of the Miramonte-Covington intersection. The proposed mitigation measures do not appear to reduce that impact to a less than significant level. In addition to the IS/MND needing to better address this potentially significant impact, the City has the following comments/questions related to the Transportation and Traffic section:

- The stated school release time in the Table 3-12 is different from what is recommended. Please clarify.
- The IS/MND identifies the school's release time as 4:45 PM, which would coincide with the PM peak commute and contribute to an LOS F at the Miramonte-Covington intersection.

This seems contradictory to the mitigation measure TRAF-1b, which would require BCS to end instruction no later than 3:30 PM.

- Based on the recommended mitigation measure TRAF-1b, BCS shall end instruction time no later than 3:30 PM, but Table 3-12 omits School Hour PM Peak as being not applicable. However, the mitigation measure would add traffic to the School Hour PM Peak, so this information should be included and analyzed to ensure that the mitigation measure is not creating a significant impact during the School Hour PM Peak.
- What are the respective vehicle queue lengths for northbound/southbound Miramonte and westbound/eastbound Covington during school commute times? What is the associated LOS for each movement?
- How will the school enforce/discourage parents from arriving no more than five minutes prior to school end times?

Blach Neighborhood Impacts

- The IS/MND should include an analysis of the potential parking impacts in the surrounding neighborhood.
- Will the project result in any traffic or parking impacts along Carmel Terrace or Altamead Drive?
- Was there any neighborhood notification, such as mailed notice to all properties within 500 feet, regarding the publication of this Notice of Intent to adopt a Mitigated Negative Declaration?

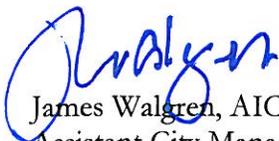
Bicycle and Pedestrian Information

- Is there any data regarding the number of children walking or biking to BCS?
- Due to the potentially significant impacts related to vehicle traffic, has the School considered any mitigation measures to encourage/facilitate students walking, bicycling and/or carpooling to the Blach campus?

Overall, it appears that there needs to be a more detailed analysis of the potential transportation and traffic related impacts and more robust mitigation measures to avoid any significant impacts. Thank you in advance for your cooperation on these issues.

If you have any questions or would like to further discuss these comments, please contact me at (650) 947-2635 or at jwalgren@losaltosca.gov.

Sincerely,



James Walgren, AICP
Assistant City Manager
Community Development Director

CC: Marcia Somers, City Manager
Jim Gustafson, Public Works Director



City of Los Altos
1 North San Antonio Road
Los Altos, California 94022-3087

January 20, 2015

Mr. Randy Kenyon
Assistant Superintendent, Business Services
Los Altos School District
201 Covington Road
Los Altos, CA 94024

**SUBJECT: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT
REPORT FOR THE PROVISION OF FACILITIES FOR BULLIS
CHARTER SCHOOL (2015-2016 TO 2018-2019)**

Dear Mr. Kenyon:

We appreciate the opportunity to comment on the Notice of Preparation of Environmental Impact Report for the Provision of Facilities for Bullis Charter School. After reviewing the notice, we offer the following concerns regarding the preparation of the environmental impact report:

Transportation and Traffic

1. Study Intersections –

- a. Egan-BCS Campus – There is already a considerable amount of traffic around this campus area. We ask that the following intersections be studied; San Antonio Rd/W. Portola Ave, San Antonio Rd/Sherwood, San Antonio Rd/Loucks, Los Altos Ave/W. Portola Ave, Los Altos Ave/Loucks, Los Altos Ave/Pine Rd, E. Portola Ave/Jordan Ave, San Antonio Rd/Almond Ave, San Antonio Rd/Main St/W. Edith Ave, San Antonio Rd/First St/Cuesta Dr, and Los Altos Ave/W. Edith Ave.
- b. Blach-BCS Campus – We ask that the following intersections be studied; Miramonte Ave/Covington Rd, Grant Rd/Covington Rd, Miramonte Ave/Berry Ave, Miramonte Ave/Portland Ave, Grant Rd/Portland Rd, Grant Rd/Oak Ave, Miramonte Ave/Fremont Ave, and Fremont Ave/Grant Rd.

2. Road Segments –

- a. Egan-BCS Campus - The City has received many concerns from residents and the school community regarding conflicts between motorists, pedestrians, cyclists and parked vehicles on the following road segments; W. Portola Ave (bet. Los Altos Ave and San Antonio Rd), E. Portola Ave (bet. San Antonio Rd and Jordan Ave, Del Monte Ave (bet. San Antonio Rd and Carmel Ave), Paso Robles Ave (bet. San Antonio Rd and Carmel Ave), Pleasant Way (bet. W. Portola Ave and Paso Robles

Mr. Randy Kenyon
Assistant Superintendent, Business Services
Los Altos School District
201 Covington Road
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- Ave), Mercedes Ave (bet. W. Portola Ave and Paso Robles Ave), and Carmel Ave (bet. W. Portola Ave and Paso Robles Ave)
- b. Blach-BCS Campus – The City has received similar complaints on the following road segments; Covington Rd (bet. Miramonte Ave and Grant Rd), Covington Rd (between Springer Rd and Miramonte Ave), Eastwood Dr (bet. Miramonte Ave and Covington Rd), Miramonte Ave (bet. Fremont Ave and Covington Rd), Berry Ave (from Springer Rd to Miramonte Ave), Golden Way (bet. Berry Ave and Covington Rd), Russell Ave (bet. Berry Ave and Covington Rd), and Grant Rd (bet. Oak Ave and Covington Rd).
3. **Parking** – In addition to traffic concerns for both campuses, residents in these areas have complained about school related parking in their neighborhoods. These concerns range from blocking driveways and/or mailboxes, narrowed streets and litter associated with the parking. Additionally, Stepping Stones Preschool is noted as having access from Rosita Avenue and described as having its teachers and staff using our Rosita Park parking lot. We ask that parking impacts in the area be studied.
4. **BCS Attendance between Egan and Blach Campuses** - There is an existing, unique pattern where Bullis Charter School children attend both campuses creating a traffic pattern between the school sites; perhaps this will worsen; we ask that this be studied for any traffic impacts.
5. **Update on mitigation measures** – The Initial Study/Mitigated Negative Declaration for the Final Facilities Offer to Bullis Charter School for 2014-2015 identified mitigation measures related to traffic impacts. Can any data be provided that determines the effectiveness of those mitigations?

Thank you for the opportunity to provide these comments. Please contact me at (650) 947-2626 or cnovenario@losaltosca.gov if there are any questions.

Sincerely,



Cedric Novenario, P.E.
Interim Public Works Director

cc: Community Development Director
Planning Services Manager
City Manager



**Community Development Department
One North San Antonio Road
Los Altos, California 94022**

April 20, 2015

Mr. Randy Kenyon
Assistant Superintendent, Business Services
Los Altos School District
201 Covington Road
Los Altos, CA 94022

**SUBJECT: BULLIS CHARTER SCHOOL DRAFT ENVIRONMENTAL IMPACT
REPORT (2015-2016 TO 2018-2019 SCHOOL YEARS)**

Dear Mr. Kenyon:

This letter is in response to the draft Environmental Impact Report (EIR) for the subject Bullis Charter School project. Generally, the project increases Bullis Charter School (BCS) enrollment by 191 students and proposes changes to the Egan, Blach and Covington school campuses. The project involves the following changes for each campus: six (6) new portables for BCS and a relocated ball field at Egan; nine (9) new portables for BCS at Blach; and four (4) new portables and a new playground for a relocated Stepping Stones Preschool from Blach, and a relocated playground for Los Altos Parent Preschool at Covington.

After reviewing the draft Environmental Impact Report and the Initial Study, the City of Los Altos has the following concerns and comments:

1. Stepping Stones Preschool: this is a private preschool and infant care licensed for up to 80 children 6 weeks old to 5 years old. This a nonconforming private use at the public Blach campus site that in its relocation to the Covington campus:
 - a. Needs use permit to exist at Blach campus and to relocate to Covington campus. Both sites are within the R1-10/PCF zoning district (see Section 14.60.030 of the Los Altos Municipal Code);
 - b. Does not meet the required 25-foot side yard setback from the southerly property line of the Covington campus;
 - c. Does not provide an appropriate buffering screening next to the structures or the playground adjacent to single-family properties to the south;
 - d. Relies on agreement for parents and employees to use the City's Rosita Park parking lot that is not in effect;

- e. Has a potential noise impact from the air conditioning units to the single-family properties to the south; and
 - f. Has a potential traffic and circulation impacts from using Rosita Avenue as drop-off area.
2. Los Altos Parent Preschool relocated playground at the Covington campus:
 - a. Does not meet the required 25-foot setback from the southerly property line; and
 - b. Does not have an appropriate buffer screening for relocated playground next to single-family properties.
3. Egan campus in general:
 - a. The relocated baseball field has impacts that should be addressed:
 - i. Noise impacts to adjacent single-family properties on May Lane to the south
 - ii. The need for buffer screening along the southerly property line;
 - b. The new structures and added capacity:
 - i. Needs expanded parking for teachers;
 - ii. Needs expanded drop-off area for vehicles.
 - c. Traffic counts:
 - i. The traffic counts were taken in late December 2012 and early January 2013. We have concerns that the traffic counts taken do not reflect present traffic conditions, and by extension, the current LOS experienced at the intersection of San Antonio Road at W. Portola Ave does not reflect the Existing plus Project modeled LOS.
4. Blach campus in general:
 - a. The new structures and added capacity:
 - i. Needs expanded parking for teachers;
 - ii. Needs expanded drop-off area for vehicles.
5. Mitigation Measures:
 - a. Traffic 4.A-2a (for Blach):
 - i. Relies on the City installing a signal at Covington and Miramonte to be Less than Significant, or else the impact is Significant Unavoidable. The LASD should pay for the signal improvement to mitigate the measures or contribute to future signal improvements if the City is not ready for implementation. The LASD should conduct outreach to the surrounding neighborhood regarding the required mitigation.
 - b. Traffic 4.A-2b (for Blach):
 - i. Implement TDM Program to reduce trips to school. How will BCS enforce this? As stated in the draft EIR, there is no certainty this will be successful.

- c. Traffic 4.A-2c (for Blach):
 - i. Asks BCS parents to use Grant Road for the AM peak hour. How will BCS enforce this? As stated in the draft EIR, there is no certainty this will be successful.
 - d. Traffic 4.A-3a (for Egan):
 - i. Maintains crossing guards at BCS driveways, however, the project should discuss minimizing student conflicts with the driveways.
 - e. Traffic 4.A-3b (for Egan):
 - i. Requires three volunteers/staff to assist in unloading/loading of students from vehicles. How will BCS enforce this? As stated in the draft EIR, there is no certainty this will be successful.
 - f. Traffic 4.A-3c (for Egan):
 - i. Encourages parents to arrive at least 15 minutes prior to the beginning of instruction, to reduce congestion. Encourages parents to arrive no earlier than five minutes to the end of classroom instruction to reduce vehicle queues. How will BCS enforce this? As stated in the draft EIR, there is no certainty this will be successful.
 - g. Noise NOI-1:
 - i. Incorrect construction hours for Saturday are stated, should be between 9 am to 3 pm.
 - h. Noise NOI-2:
 - i. Should address City's HVAC noise limit of 50 dBA at the property line
6. General Traffic Questions:
- a. Are the mitigation measures for each school stand-alone? Or do they have to be combined?
 - b. Aside, from Traffic 4.A-2a, if the other mitigation measures are implemented and do not improve the impact, what will LASD do to mitigate?
 - c. There are a significant number of Egan students that walk and bike that must cross the BCS driveways. Although maintaining the crossing guards will help address potential vehicle-bicycle and vehicle-pedestrian conflict, would LASD consider further reducing that conflict by providing an alternative access point at the gate on San Antonio Road to allow for Egan students an unimpeded way to school? Students coming south of the site can potentially access Egan here. To make this access point more attractive, improvements can be made such as a pathway and fencing to separate the path from BCS grounds.
 - d. The analysis and proposed improvements do not take into consideration the queueing and safety concerns resulting from parents who park on the north side of W. Portola and cross mid-block between vehicles. These movements in unmarked locations add to the

queueing effect, and often parents and students dash in front of vehicles to cross the street. Will there be a proposal to help mitigate this?

7. Alternatives:

- a. The analysis of alternatives should clarify its reasoning for selecting appropriate alternatives. For example, it is not clear why locating BCS to other LASD properties is infeasible, not merely too costly;
- b. Alternative No. 2 seems infeasible and relies on an unenforceable mitigation to constrain the traffic routes to the Blach campus and should not be included.

Thank you for the opportunity to provide these concerns and comments. Please feel free to call me at (650) 947-2632 or at dkornfield@losaltosca.gov if there are any questions.

Sincerely,

David Kornfield
Planning Services Manager

Cc: City Manager
Community Development Director
Transportation Services Manager