

## 2. Response to Comments

LETTER RR25 – Marie Rice (11 pages)

**From:** Paula Montalbo  
**To:** Mark Teague  
**Cc:** Pat Escalante  
**Subject:** Fwd: Comments on the North School Revised DEIR  
**Date:** Monday, September 17, 2018 11:50:17 AM  
**Attachments:** MarieRiceDEIR Comments 9.17.18.pdf

----- Forwarded message -----

**From:** Marie Rice [REDACTED]  
**Date:** Mon, Sep 17, 2018 at 11:34 AM  
**Subject:** Comments on the North School Revised DEIR  
**To:** pmontalbo@hbcisd.org

September 17, 2018

Hermosa Beach City School District,

Thank you for providing the opportunity to comment on the August 2018/Re-Circulated Sections of the North School DEIR.

RR25-1

The more focused traffic analysis contained in this re-circulation has changed some previous findings from "insignificant impacts" to "significant, unavoidable, and adverse impacts" as follows: traffic impacts, traffic hazards, and secondary parking effects. While this improved traffic analysis was necessary and greatly appreciated, there are several areas within this re-circulated document that need additional and improved technical analysis to mitigate impacts and provide decision makers and the community with an informational document that is an effective platform for meaningful participation and informed decision making.

RR25-2

Most importantly, reduced project alternatives should be proposed in the Final EIR, since the DEIR fails to propose any alternatives to the project other than "Alternate A: No Project", and Alternate B: No Project/Reallocate Measure S Funds".

RR25-3

According to Michael Baker International/CEQA SQUAD (August 2018)

"9 of 10 EIRs have a reduced project alternative...It is very rare, and exceedingly rare, for a development project to not have a reduced project alternative of some sort...While not a CEQA requirement, some type of reduced project is a typical alternative, simply because it is the easiest way to demonstrate that the project objectives can still be met while reducing the impacts associated with it. If there is any public/stakeholder input during the scoping or DEIR comment period asking that a reduced project alternative be studied, than that would raise a red flag..."

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The impacts of the Modified Parking Restriction Option described on pages 5.12-43 through 54 of the August 2018/Re-circulated DEIR (which proposes student drop off and pick up zone in the right of way on the street on 25<sup>th</sup> Street and Myrtle Avenue) are evaluated as follows on page 6.1:

RR25-4

"However, traffic impacts caused by the proposed project during the peak half hour arrival and departure periods, traffic hazards caused by operation of the proposed school, and secondary parking effects caused by restricting on-street parking during peak arrival and departure periods of the proposed school will remain significant, unavoidable, and adverse after the imposition of mitigation measures".

In addition, the August 2018 Re-circulated sections of the DEIR state:  
Page 5.12-58 "the project cannot physically accommodate onsite passenger loading"

Page 6-7 "No mitigation measures are available to reduce parking impacts during project operation"

Based on these statements, the District has an obligation to propose Reduced Project Alternatives. An EIR must describe and analyze a range of reasonable alternatives to the project that are "potentially feasible, would feasibly attain most of the basic objectives of the project, and would avoid or lessen any of the project's significant effects". (CEQA Guidelines S151266.6, subd (a).)

The Project Description on page 4-1 of the November 2017 DEIR: Statement of Objectives says: "Objectives for the proposed North School Reconstruction project will aid decision makers in their review of the project and associated environmental impacts:

RR25-5

1. Relieve existing overcrowding at Hermosa Valley School and Hermosa View School.
2. Eliminate temporary, portable classroom buildings at Hermosa Valley School and Hermosa View School.
3. Restore the multipurpose rooms at Hermosa Valley School and Hermosa View School by converting the temporary classrooms back to their original multipurpose spaces.
4. Restore the District's full-day kindergarten program.
5. Maximize the use of limited District funds.
5. Maximize the use of District-owned property.
7. Minimize construction outside the developed footprint of the North School.
8. Construct 21<sup>st</sup>-century educational facilities with flexible outdoor and indoor learning

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spaces.

9. Construct new educational facilities and/or a new school that is safe and secure for students.

10. Construct new educational facilities and/or a new school that uses energy efficiently and cost-effectively."

The language of Measure S stated: "The following is the full proposition presented to the voters by the Hermosa Beach City School District.

To reduce student overcrowding and make safety, security, and health improvements; construct, renovate, modernize and equip classrooms and facilities at North, Valley and View Schools; replace or repair roofs; provide technology improvements for students; and upgrade or replace outdated electrical, plumbing, heating and air conditioning systems, shall Hermosa Beach City School District issue \$59,000,000 of bonds at legal interest rates, and have an independent citizens' oversight committee with no money for administrative salaries or taken by the state?"

RR25-5  
CONT'D

The District's description of the proposed use of the project as described in the February 2017/Notice of Preparation - Section 3.2 (page 20):

"The reopened campus would have a maximum enrollment capacity of 510 seats, although the District anticipates operation with no more than 400 students."

Neither the Project Description, nor the Measure S Bond language, nor the Project Proposed Use specify or require that North School house 510 students. Yet to date, the possibility that a smaller project, which meets most or all of the District's stated objectives for North School, has been overlooked.

RR25-6

It is reasonable and feasible that a reduced project alternative to house a maximum capacity of 400 students would make space for an onsite drop off / pick up zone, and thereby reduce safety hazards, reduce traffic hazards, and reduce the significant and adverse secondary parking impacts while still delivering the project objectives, bond language, and stated use.

RR25-7

Based on the requirements of CEQA, and the common practice to examine reduced project alternatives, the District is obligated to propose several reduced project alternatives with a smaller number of classrooms. These reduced project alternatives should include an onsite passenger loading zone, in combination with a re-evaluation of mitigations for the Kiwanis/Rotary Drop Off zone, the School Bus Shuttle, an emphasis

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RR25-7 CONTD	on Car Pooling, provision of a permanent monitoring/standby mandatory mitigation measures, and Widened intersections, so that decision makers are presented a full array of options to consider.
RR25-8	<p>Note: there are many instances within this Re-Circulated Document in which the conclusion that a proposed mitigation is "not preferred" is stated. "Not preferred" is not CEQA language; the EIR needs to disclose whether the mitigation measure is feasible or infeasible and the extent to which it mitigates impacts.</p>
RR25-9	<p>Please find comments on specific statements and/or conclusions in the remainder of the August 2018/Re-circulated DEIR:</p> <p>Page 1.7 1.4.2: Operation Operations of the North School are described as "enrollment capacity of 510 seats. The school would accommodate the District's third and fourth grade students,"</p> <p>This description of operations does not describe the planned use of the North School to initially house a variety of grades from the Valley/View Schools when the renovations and construction take place at these other School sites.</p> <p>Please clarify the proposed use of the North School to house students while Valley/View Schools are under construction, including grades and numbers of students who will be housed temporarily at North School, and the timelines of this temporary use.</p>
RR25-10	<p>Page 1.7 1.5.2: Alternate B No project / Reallocate Measure S Funds This alternative describes construction of permanent school buildings at View and Valley Schools "of up to 600 K-3 students on approximately 4.6 acres, and Hermosa Valley School would continue to operate its fourth to eighth grade program with up to 1,000 students on approximately 7 acres".</p> <p>What is the ratio of students per acre at Valley School and at View School?</p> <p>What is the ratio of students per acre for North School operating at 510 students on 2.35 acres?</p>
RR25-11	<p>Page 5.12-8 through page 9 Transportation and Traffic / Roadways</p>

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RR25-11  
CONTD

Roadway classifications for the following streets are not identified:  
26<sup>th</sup> Street, 27<sup>th</sup> Street, Gould Avenue, and Morningside Drive (both segments),  
Monterey Boulevard.

Please add the roadway classifications for these streets.

RR25-12

Page 5.12-9

"other local streets in the close vicinity of the school that might be used as access routes include Silverstrand Avenue and Ozone Court."

Based on how the surrounding streets at Valley School are used as unofficial drop off/pick zones, as well as the findings in this re-circulated section that the "...traffic impacts and vehicle queuing on street segments approaching the loading zones would also improve, but remain significant and unavoidable" on page 5.12-44, it is highly likely that both of these roadways will be used by parents to drop students off at the school. Please include the traffic analysis of Silverstrand Avenue and Ozone Court in this Street Segment section, including baselines before the project, and changes to this baseline after the project is completed.

RR25-13

Page 5.12-26 through 32

Project Impact on Intersection Levels of Service: Monterey Blvd and Park Avenue

Please explain how the finding can be made that there are no significant impacts to the Park Avenue at the intersection of Monterey Boulevard, as well as the street segment on Park Avenue from Monterey to 24<sup>th</sup> Street. The finding in Figure 5.12-12 and 5.12-13 is that it is not a significant impact at the intersection at Park and Monterey; yet in Figure 5.12-14 and Figure 5.12-16 the finding is that there is a significant impact on Park Avenue from Monterey to 25<sup>th</sup> Street. That is not plausible. Please re-evaluate this impact at this intersection/street segment, and provide mitigations to decrease these impacts.

RR25-14

Page 5.12-37 Intersection widening mitigating option:

Secondary Effects caused by intersection widening

"For these reasons and because the cost of the improvements is not proportionate to the short-term traffic impact that would occur only during the peak half hour morning arrival and afternoon departure periods...the City and the District determined that the benefit of this potential mitigation measure would not outweigh the secondary environmental effects or its high cost to install. Therefore, this potential mitigation measure is not preferred."

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RR25-14  
CONT'D

### 2. Traffic signalization Mitigating option

"... neither the City nor the district believe this proposed capital improvement option is necessary. Therefore, this potential mitigation measure is not preferred."

What body from the City made the determinations that the widening and signalization mitigations were "not preferred"?

Indicate whether the mitigation is "feasible" or "infeasible", and strike the conclusion that this mitigation is "not preferred".

Page 5.12-38 and 5.12-44

### Staggered Bell Schedule Project Alternative Option

The staggered bell schedule is not a "project alternative option". Rather, it is a mitigation measure that could be used to reduce or eliminate impacts. Please change this description.

RR25-15

Indicate whether the mitigation is "feasible" or "infeasible", and strike the conclusion that this mitigation is "not preferred".

If existing contracts with teachers may limit the implementation of this potential mitigation measure, what are the terms of these contracts that would prevent this mitigation?

When do the current contracts end?

What is the probability that the contracts could be amended to include a 30 minute staggered bell? Given the timeline for project completion, it seems reasonable and feasible to negotiate this change to allow the implementation of a 30-minute staggered bell before this mitigation measure would actually be used.

RR25-16

Page 5.12-38 and 5.12-50

### School Bus Shutting Option

Provide the analysis for the assumption that "20 students from North School" would ride the bus. Explain how the assumption was made that "impacts at the two intersections would remain significant and adverse" without an analysis of projected ridership between the schools.

Indicate whether the mitigation is "feasible" or "infeasible", and strike the conclusion that this mitigation is "not preferred".

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RR25-17 Page 5.12-39  
Street Segments  
Based on how the surrounding streets are used to drop/pick up students at Valley School, as well as the findings in this re-circulated section on page 5.12-44 that the "... traffic impacts and vehicle queuing on street segments approaching the loading zones would also improve, but remain significant and unavoidable", it is highly likely that Silverstrand Avenue and Ozone Court will be used by parents to drop students off at the school.

Please include the analysis of Silverstrand Avenue and Ozone Court in this Street Segment analysis, along with mitigations to reduce or eliminate impacts of this use as a route to school and a drop off area.

RR25-13 Page 5.12-44  
3. Modified Parking Restriction Mitigating Option  
"...traffic impacts and vehicle queuing on street segments approaching the loading zones would also improve, but remain significant and unavoidable".  
What are the state education code requirements for drop off and pick up student loading zones?  
The project proposes to place the entire burden of student loading activities on City right of way, yet this re-circulated analysis does not evaluate school traffic data collected at the other two elementary schools in the city (Valley and View Schools). This school data should be used to evaluate the length of the proposed loading zones to estimate potential queuing impacts on 25<sup>th</sup> Street, Myrtle Avenue, and other impacted street segments.

RR25-19 The City of Hermosa Beach submitted a comment letter on the original DEIR dated 1/2/18, which states (on page 8 of 13):  
"At a minimum, the following school data should be included in the FEIR:  
• Percentage of students that arrive/depart by vehicles versus walking to school (drop off and pick up demand)  
• Number of students per vehicle (vehicle occupancy)  
• Observed time for students to load and unload (service rate)  
• Arrival rates and patterns for each morning and afternoon peak period, which should show that the bulk of vehicles likely arrive just before school starts and ends and then tapers off.

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CONTD

With this set of traffic data, the DEIR could estimate the potential queuing...by applying the Queuing Theory formulas or graphically depicting the Vehicle Accumulation Versus Time diagram for the entire student loading system... Similarly, this method can be used to determine the adequacy of an onsite student-loading zone included in Project Alternatives. If the student loading activities could be mostly contained onsite and on 25<sup>th</sup> Street, then it would reduce the likelihood of needing supplemental loading zones..."

Please include this data and analysis for the proposed loading zones on 25<sup>th</sup> Street, Myrtle Avenue, and the Valley Park Community building drop off zone, and any other area proposed on-site or off-site.

RR25-20

Page 5.12-49

### 5. Valley Park Community Building Lot Project Alternative Option

"This project alternative would involve the use of the parking lot behind the Kiwanis/Rotary Club building at Valley Park as an official District-operated passenger loading area... Since it would be a designated passenger loading area, the District would be required to improve access between the loading area and North School in compliance with California Building Code Standards and meet requirements of the American with Disabilities Act. The cost to make these improvements would be about \$200,000".

The use of the Valley Park Community Building parking lot is not a "project alternative option", it is a mitigation measure that could be used to reduce or eliminate impacts. Please revise this language.

Without a real analysis of the proposed design and length of the drop off / pick up lane(s) in this parking lot, an evaluation of this off-site district designated passenger loading area as a mitigation measure cannot be made.

RR25-21

Provide the design and length of the proposed pick up and drop off lane within the Kiwanis/Rotary Parking lot, as well as the analysis of this detailed design as a mitigation with the technical evaluation proposed by the City of Hermosa Beach, as described in its submitted a comment letter on the original DEIR dated 1/2/18 (on page 8 of 13):

"At a minimum, the following school data should be included in the FEIR:

- Percentage of students that arrive/depart by vehicles versus walking to school (drop off and pick up demand)
- Number of students per vehicle (vehicle occupancy)
- Observed time for students to load and unload (service rate)

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- Arrival rates and patterns for each morning and afternoon peak period, which should show that the bulk of vehicles likely arrive just before school starts and ends and then tapers off.

Provide a description of the use of this same parking lot by Chadwick School (or any other institution) as a bus stop.

Include details, if any, of a contract in place between Chadwick (or any other institution) and the Kiwanis or Rotary for this use, or a contract between the Chadwick School and the City of Hermosa Beach for this use.

Indicate whether the mitigation is "feasible" or "infeasible", and strike the conclusion that this mitigation is "not preferred".

Since no determination can be made that this mitigation is "economically infeasible" without quantitative analysis, please strike this and replace with the actual analysis of the mitigation.

Advise if the Kiwanis/Rotary parking lot (if once designated as an official District-operated passenger loading area) would reduce the amount of required passenger loading/unloading at the school site – either on 25<sup>th</sup> or Myrtle Avenue, or onsite at North School.

Page 5.12-52 through 53  
Passenger Loading

"According to "Traffic Operations and Safety at Schools: Recommended Guidelines by The Texas Transportation Institute (Cooner et al. 2004), drop-off and pick-up areas at schools should include at least one space for every 50 students, with a minimum of 5 spaces. The proposed school has a maximum design enrollment capacity of 510 seats and would require 11 passenger loading spaces."

Please provide this document in the appendix of the FEIR.

This recommendation is cited as the basis for the loading zones, yet it is an example of a guideline from the City of Henderson-Nevada (page 2-21). Please provide local examples of practices and guidelines that are more reflective of the City of Hermosa Beach.

Please offer the details of the on-site loading zones at Valley and View Schools, including length of lanes, numbers of students, and the school data related to pick up

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CONTD

and drop off areas as requested by the City of Hermosa Beach comment letter of 1/2/18.

Page 5.12-53

### Passenger Loading

“... it is possible that parents drop off and pick up their students at areas not officially designated by the District for student loading. This has been observed at Valley and View Schools, which have limited onsite passenger-loading areas. It is possible that parents of North School students will drop off / pick up students at meet-up places such as Valley Park that have safe routes to school. It would be speculative to determine the percentage of students that would be dropped off and picked up offsite locations... and 25 spaces in the Rotary/Kiwanis Club parking lot. Use of Valley Park and other locations would further reduce vehicle traffic and associated roadway hazards on streets south of the project site.”

RR25-24

Please provide analysis of the described off-site drop off/pick up at Valley and View Schools, and apply those findings to forecast potential usage for North School students at the Kiwanis/Rotary Club parking lot designed and designated as an official district student-loading zone.

Page 5.12-53

### Vehicular, Bicycle, and Pedestrian Safety

This section bases conclusions on a survey conducted by the City of Hermosa Beach in August 2016 (Appendix M4). This survey states that parents of approximately 150 Hermosa School district students were surveyed, which represented 11% of the total student enrollment in 2016. The questions did not include specific information about possible off-site drop off/pick up areas for North School, or any mention of traffic delays due to queuing at the on street loading zones at North School.

RR25-25

Please conduct a new survey (managed by the District), which poses more specific questions that relate to the actual proposed project at North School. The survey should include, but not be limited to: the possibility of use of a School Shuttle, the use of car pooling, the use of designated drop off areas at Kiwanis/Rotary parking lot; include specific questions for families with students at 2 or 3 school sites; and other questions designed to collect data about each mode of travel (bike, skate, walk) from parents of 3<sup>rd</sup> and 4<sup>th</sup> grade students, as well as other questions related to queuing wait times at the North School site. The response rate goal should be much higher than 11% to be considered relevant and reliable.

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Finally, the following quote by a District parent outlined on Page M4-6 of the 2016 Hermosa Beach Walk/Bike to School Survey (within the Appendix of this re-circulated document) sums up why all project alternatives, including a reduced project alternative, with on-site passenger loading, an incentivized car pooling program, and of-site passenger loading areas must be considered to reduce safety and traffic hazards caused by the proposed project, with an ongoing monitoring mitigation program of the traffic impacts be employed:

RR25-26

"Some drop off parents drive like idiots and park even worse. They are so busy trying to get their kid to school, they are not watching out for others."

Thank you for this opportunity to participate in the EIR process. We believe that a robust EIR process will provide an array of alternatives and mitigations which meet the requirements of CEQA, and offers decision makers the best options to meet the needs of the District.

Regards,

Marie Rice  
Measure S Supporter