



October 27, 2008

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

Dear Mr. Savidge:

The City of El Cerrito appreciates the opportunity to review and comment on the Draft Environmental Impact Report (EIR) for the Construction and Renovation of Castro Elementary School to Replace Portola Middle School Project. We support the West Contra Costa Unified School District's (WCCUSD's) efforts to address the seismic safety concerns at the existing Portola Middle School site, and to provide high quality school facilities that are compatible with their surroundings. El Cerrito City staff has reviewed the EIR and has the following comments:

Project Description (Chapter 3.0)

- We believe that the closure of the existing Portola Middle School is not a “project of independent utility” and should be analyzed as part of this EIR. The closure of the existing Portola Middle School is a part of the planned construction and renovation of the Castro Elementary School to create the new Portola Middle School. The existing Portola Middle School will not close without a replacement facility available. Treating closure of the school separate from the construction of the new school should be viewed from the perspective of the California Environmental Quality Act's (CEQA's) provisions relative to comprehensive, compared to piecemeal review. Therefore, the EIR should fully analyze the closure and resulting vacancy of the existing Portola Middle School as part of the Project. In addition, since certain buildings at the existing Portola Middle School are seismically unsafe, the demolition or alternative of non-demolition and stabilization of those buildings should be fully analyzed as part of this EIR. Demolition or stabilization of these buildings is “reasonably foreseeable” given the determination that the buildings are seismically unsafe, and the District decision to relocate the existing school rather than retrofit the buildings.
- Table 3.0-2 – WCCUSD enrollment – This table does not appear to reflect that the Fall 2008 kindergarten classes are full at Fairmont, Harding, Kensington, Madera and Stege Elementary schools. The City provided this information on kindergarten enrollment in its comment letter on the Notice of Preparation (NOP)/Initial Study for the EIR, dated March 20, 2008. The EIR should address the capacity questions raised by the City in our March 20th letter to analyze any potential inadequate capacity at other elementary schools as part of its analysis of the reassignment of existing Castro Elementary School students. The analysis in the EIR may understate this impact by assuming that all these schools are under-enrolled and would have adequate capacity to serve the Castro Elementary School students.

Therefore, the EIR concludes that the impact of reassignment would be less than significant. The EIR should analyze and determine if this impact is potentially significant given the current enrollment levels and future trends, and identify mitigation measures if needed to address this impact.

- It appears that temporary relocation of the existing Portola Middle School students may be a possibility. For example, the school may be damaged in an earthquake or the construction of the new Middle School delayed. We would recommend that the EIR analyze temporary relocation.
- The hours of operations for the existing schools are not clear. While classes may start at a particular time and after-school programs another time, the time the campus and park is open and available to students, staff and the public should be detailed in addition to the time for classes and other associated programs. Proposed changes in times of operation and availability should be reviewed for impacts on the surrounding community.
- Sections 3.1 and 3.5 - The descriptions of project locations, current uses, and characteristics should describe the drop-off and pick-up areas and operations at both the existing Castro Elementary School and Portola Middle School. This will lay the groundwork for an adequate analysis of the impacts of the proposed project. It is important to note that the existing Portola Middle School has two on-site drop-off and pick-up areas: one on Navellier Street and one on Moeser Lane. To at least meet the existing site design of the Portola Middle School, and to diminish congestion and emergency vehicle access concerns on the local residential streets surrounding the new Portola Middle School site, the new school should provide an on-site drop-off and pick-up to maximize use by cars and buses. This need is further supported by the project objective of developing “a project that respects community patterns of use and mitigates potential impacts.”

It appears that there are two locations for providing an on-site drop-off/pick-up area, one or both of which would require little to no change to the proposed School site plan, and would not require additional paving: 1) Vehicles could enter and exit from Donal Avenue, and loop through the Lower Hardcourt area; and/or 2) Vehicles could enter and exit from Lawrence Street and/or Donal and circulate through Upper Courtyard. A third option would require paving landscaped areas on Donal in front of the Admin/Gym and classroom buildings, so vehicles could circulate in that area. Using one or both of the first two options seems more efficient, less costly, and would preserve landscaping.

- Section 3.5, Page 3.0-35 - The proposed Collaborative for High Performing Schools (CHPS) standard to “meet maximum parking capacity guidelines and provide preferred parking for carpools and vanpools to limit automobile use” should be demonstrated in the Traffic and Circulation section of the EIR.
- Page 3.0-35 - The percentage of secure bicycle parking to be provided is indicated as 15 percent, which is inconsistent with the 25 percent indicated on Page 3.0-36, and should be corrected as appropriate. It should be noted that both percentages exceed the design guidelines of the City of El Cerrito Circulation Plan for Bicyclists and Pedestrians.
- Page 3.0-35 - The indication that the “existing painted curbs and signage would help manage circulation at the campus to help relieve congestion at peak pick-up and drop-off

times and neighborhood commute times, and to ensure continuous emergency access to the campus” should be demonstrated by first describing existing operations with the Castro Elementary School and then comparing the added activity due to the middle school in the Traffic and Circulation section of the EIR. Further, the indication that a “WCCUSD staff monitor would be present to assist in student drop-off and pick-up” should be included as an integral part of the project description or a mitigation measure as appropriate.

- Figure 3.0-9 should have a legend to identify existing and proposed structures, landscaped and paved areas.
- The dashed line on top sketch of Figure 3.0-10 should be identified.
- The pattern on buildings 2, 3 and 4 on Figure 3.0-20 should be identified.

Introduction to the Environmental Analysis and Assumptions Uses (Chapter 4.0)

- Table 4.0-1 and Table 4.0-2 list the surrounding projects considered for cumulative analysis. Table 4.0-2 contains three separate projects totaling 63 units that are closer to the proposed site than the El Cerrito Plaza BART station and Windrush School. Both the BART station and Windrush School are included in the Cumulative Analysis. Individually, these three projects may not have a significant impact on the proposed project, but together as 63 residential units in the general vicinity of the project, they do represent enough units for consideration and analysis.
- Most technical chapters have some level of review of applicable General Plan policies and a brief statement on consistency presented in a Table format. While the EIR distributes the General Plan Consistency Analysis into each technical section of the EIR, a consolidated list might also aid review. The review needs to demonstrate which policies are consistent or in conflict with the development with additional details that are project specific. Overall, the analysis appears to only provide a cursory conclusion on consistency.

Land Use and Planning (Chapter 4.1)

- The EIR appears to only focus on zoning designations and does not consider other City policies that may conflict with the proposed relocation to the Castro site. For example, the EIR should discuss the inconsistency of the proposed vacancy of the existing Portola Middle School with City policies to prevent blight and foster a high quality built environment, and enhance economic development in the General Plan and other City plans. The WCCUSD’s plan to leave the building vacant could be inconsistent with these City policies. The vacant building could be an attractive nuisance leading to a potential for vandalism and other crimes. It also could lead to generally blighted conditions that would adversely affect adjacent properties and land values. The EIR should identify these inconsistencies with City policies to determine their significance under Impact 4.1.2 and include mitigation to address the adverse effect of vacancy. The EIR should contain certain specific property maintenance mitigation measures, and consider the pros and cons of demolition of Portola School to address the potential land use, safety and seismic safety impacts of leaving it intact for an undetermined period of time.

- Impact 4.1.4 states that the proposed student reassignment would place more students at Fairmont, Stege, and Mira Vista Elementary Schools and Adams Middle School. Reassignment of students would not result in any conflicts with relevant plans, policies and regulations and that no mitigation measure is required.

Mitigation measures would appear to be required in this case. The WCCUSD should look at future increases in student enrollments. According to kidsdata.org, in California and most Bay Area counties, the overall population – as well as the estimated child population – increased from 1995 to 2008. In the Bay Area, Santa Clara County has the largest child population at 452,592 children, followed, in order by Alameda, Contra Costa, San Mateo, San Francisco, and Marin Counties. It should also be noted, that between 2004 – 2008 all El Cerrito and Kensington elementary school enrollments, except for Castro Elementary school, have increased. Castro's population began declining after the school board scheduled it for closure. Attachment 1 details this enrollment pattern. Also, the EIR should analyze what the impact of the increased enrollment at Fairmont School means for the already Board approved sale of the senior center land to the City.

In addition, several reports have indicated seismic issues at Adams Middle School and the district currently does not have the funding to retrofit and/or replace the current buildings. The district has not formulated a plan if Adams Middle School becomes unusable and Portola's enrollment exceeds its capacity.

Aesthetics/Visual Resources (Chapter 4.2)

- The text following Impact 4.2.11 should describe in more detail the existing nighttime illuminated park activities cited there.
- There appears to be no analysis of the visual impacts of the new Portola Middle School structures on surrounding single-family residential neighbors, specifically neighbors to the east along Lawrence Street. Elevation drawings should show a cross section from adjacent uphill neighbors, along Lawrence Street to Norvell Street. A photo simulation should also be included to adequately analyze view impacts.
- The analysis for Scenic Vistas and Scenic Resources for Portola School appears irrelevant since there is no specific project design to analyze.
- In 2004/05, the WCCUSD utilized the lower play area of the Portola Middle School as temporary housing for Kensington Hilltop School during the school's reconstruction phase. Since the relocation of Kensington Hilltop School to their permanent site, the district abandoned half of lower blacktop area (where the temporary school was housed), leaving the area as a storage yard for old portables and trailers. During past years, this area has been vandalized on several occasions. The City would like to see this area restored to its original condition, prior to the closure of the Portola Middle School campus. Or it could preferably be used by the City to provide compatible recreational uses with the City Community Center, and therefore help mitigate the impacts of increased usage of Castro Park, discussed in this letter and the EIR.

Cultural and Paleontological Resources (Chapter 4.4)

- Construction personnel should be educated by the project archaeologist on what to look for and on protocol when a potential historical artifact is encountered prior to any grading activities.

Geology and Soils (Chapter 4.5)

- The EIR identifies significant unavoidable impacts on the existing Portola Middle School building due to earthquakes, landslides, and unstable soils (Impacts 4.5.5, 4.5.11, and 4.5.14). The potential collapse of a building due to seismic and soils issues may present a significant risk to surrounding uses and buildings. In particular, the City is concerned about potential impacts of building collapse on adjacent public and private properties, including on users of the adjacent Cerrito Vista Park, the El Cerrito Community Center/Swim Center Complex, and the buildings in the Complex. These impacts should be addressed in the EIR. Mitigation Measure 4.5.5 appears insufficient to address these impacts. The Mitigation Measure only requires WCCUSD to consider demolition or stabilization of the buildings. The EIR should require demolition or stabilization of the existing building as mitigation within a specific timeframe, such as within six months of school closure. Since the impact is significant and unavoidable, WCCUSD must adopt all feasible mitigation measures before adopting a statement of overriding considerations. Therefore, the City requests that the following mitigation measure be added to the EIR: Within six months of school closure, the existing seismically unsafe Portola Middle School buildings be demolished or stabilized to preclude a seismically induced collapse or partial collapse of the subject buildings, as determined by a qualified geotechnical engineer, geologist, or other appropriately qualified expert. As part of stabilization, a temporary catchment wall could be considered on the school site to reduce risk of injury to people or surrounding property.

This mitigation should be linked to and be consistent with Mitigation Measure 4.4.5 that provides for studies to determine if it is structurally and financially feasible to stabilize the existing Portola Middle School buildings for adaptive reuse.

- The discussion on page 4.5-19 regarding the City's Special Study Map should be revised to indicate that the map is used generally to display areas subject to the City's Hazard Overlay District, which has been established by the El Cerrito Municipal Code. The map is solely for the purposes of enforcing the ordinances and also assists the Building Official in determining whether a geologic study is required for any proposed construction. The map makes reference to other sources for more precise information, specifically the Tri-Cities Seismic Safety Study (Bishop 1973).

Hydrology and Water Quality (Chapter 4.7)

- Page 4.7-4, Compliance with the City's Creek Protection Overlay District should be included in the Impacts and Mitigation Measures discussion.
- Page 4.7-9, as indicated in the Section 4.7.2 Regulatory Framework as well as the City's Municipal Code, the construction and post-construction impacts of the proposed project must meet the requirements in the most recent version of the Contra Costa Clean Water Program *Stormwater* C.3 Guidebook. This should be noted and made consistent throughout the EIR. As an example, the discussions of Impact 4.7.2 and Mitigation Measure 4.7.5a

should reference the requirements of the Contra Costa Clean Water Program (CCCWP) as taking precedence over other standards and guidelines.

- Page 4.7-15 - The school district is not required to obtain a grading permit from the City because the State Architect takes precedence. However, the City will review grading plans for issuance of a Transportation Permit to approve haul routes and specify any appropriate haul route impact fees.
- Page 4.7-18, Mitigation Measure (MM) 4.7.5a – This measure must include preparation of a Stormwater Control Plan (SCP) in accordance with the CCCWP C.3 Guidebook. The SCP must be developed simultaneously with the preliminary project site, drainage and landscaping plans. The SCP must be submitted for review and approval by the City before detailed site, drainage and landscaping improvement plans are prepared. The discussion regarding a filtering system should be revised to be consistent with the CCCWP guidelines of using filtering systems as a last resort. The section should also include the City of El Cerrito Public Works Department as an enforcement/monitoring agency in addition to those already listed.
- Page 4-7-19, MM4.7.5b – Connections to the City’s stormwater system will require a City Encroachment Permit. As such, the section should also include the City of El Cerrito Public Works Department as an enforcement/monitoring agency in addition to those already listed.

Traffic and Circulation (Chapter 4.8)

- General - The Traffic and Circulation Section of the EIR does not adequately evaluate existing conditions or impacts of the proposed project. As indicated under our comments for Section 3 Project Description, this section should fully evaluate existing and proposed drop-off and pick-up operations, as well as on-site and off-site parking demand and capacity. In addition, other technical information appears to not have been provided or may be incorrect as described in subsequent comments.
- Mitigation Measures 4.8.1 and 4.8.4 – Traffic Control Plan for traffic impacts due to demolition of the existing Portola Middle School and construction of the new Portola Middle School should be more specific. The mitigations should specify measures that are required in the Traffic Control Plan rather than listing a menu of potential “standard” components that the Plan “shall consider.” Both the existing and proposed new Portola Middle School sites appear to present potentially significant traffic constraints that are known, and must be specifically addressed in the mitigation measures.
- Mitigation Measure 4.8.1 - Include in this mitigation, City imposition of commercial vehicle conditions, and any time restrictions seen as necessary for oversize loads.
- Table 4.8-3 and Section 4.8.3 - To fully evaluate Significance Criteria 1, 5, 6, 7, and 8 considering previously expressed public and City concerns, each of the City of El Cerrito General Plan Policies should be individually evaluated. Important elements to be addressed include the following:
 - How will the project impact a public transit system that adequately serves the new middle school?

- › How will the project impact bicycle routes and access to the new middle school?
 - › How will the project impact safe pedestrian access to the new middle school?
 - › How will the project impact maintaining adequate emergency vehicle access?
 - › How will the project design impact walking, bicycling and transit use?
 - › How will the project impact the role of streets not only as vehicle routes, but also as part of an extensive system of public spaces where people live and city residents meet?
 - › How will the project impact the existing system of arterial and collector streets and if necessary employ traffic management techniques to control the speed of vehicles traveling on residential streets?
- Page 4.8-20 - Because the project generates more than 100 trips, it may have to evaluate the Traffic Service Objectives (TSOs) for Routes of Regional Significance, including San Pablo Avenue, Carlson Boulevard, Central Avenue, and Cutting Boulevard. The West Contra Costa Technical Advisory Committee (WCCTAC) and Contra Costa County Transportation Authority (CCTA) should be consulted.
 - Page 4.8-33 - The trip generation labels in Table 4.8-8 are reversed for Castro Elementary and Portola Middle School. The total net trip generation including the reassigned trips should be explained and reported. In addition, the trip distribution for the middle school and relocated elementary school students should be shown separately.
 - Page 4.8-39 – Considering the activity to and from the proposed visitor/staff parking lot, the proposed curb cut on the western end of Donal Avenue should be located as far away as possible from Norvell Street, but at a minimum 50 feet from the crosswalk.
 - Pages 4.8-39 and 4.8-47 – We have concerns regarding the following findings in the EIR:
 - › “no additional locations for crosswalks have been identified”;
 - › “Safe routes to school have already been designated for the school site”;
 - › “Dedicated bicycle facilities would not be provided along the local streets.”

These findings need to be substantiated including references/sources of information and further evaluation or adequate mitigation measures provided. As indicated in the El Cerrito Circulation Plan for Bicyclists and Pedestrians for schools: “Students, parents, staff, teachers, and administrators all arrive and depart the school grounds within a brief period of time. As a result, there are often conflicts between motorists, bicyclists, and pedestrians. This is especially a concern because young children and youth are present. A more detailed investigation of transportation issues for each school is required. However, there are some improvements that should be prioritized, such as providing a complete and well-connected sidewalk or path for major routes leading to the school, updating the signage and striping to alert motorists of the presence of school children, and enforcing traffic patterns in pick up and drop off areas.” As such, the project should evaluate and identify any needed improvements to existing sidewalks, crosswalks, and bicycle facilities in this area based on the design guidelines in the Circulation Plan. The project should include development of a school route plan as indicated in the California Manual on Uniform Traffic Control Devices.

The school route plan needs to be developed in a systematic manner by the school and the City’s Police and Public Works Departments. The plan must show streets, the school,

existing traffic controls, established school walk routes, and established school crossings. Furthermore, the type(s) of school area traffic control devices used should be related to the volume and speed of vehicular traffic, street width, and the number of the students using the crossing. More specifically, the need to enhance and/or relocate existing crosswalks must be evaluated in light of the additional traffic and buses, changes to loading and bus zones, and changes to the school entrances. This evaluation goes hand-in-hand with proposed Mitigation Measure 4.11.2.4e that calls for the provision of crossing guards at appropriate neighborhood intersections. The project also needs to include development of a comprehensive Safe Routes to School Program using federal guidelines. It should be noted that WCCTAC and Contra Costa County recently received a Federal Safe Routes to School Program grant to conduct walkability audits/walkability workshops, on-site technical assistance, and classroom pedestrian educational presentations for several elementary and middle schools in the WCCUSD including Portola Middle School. This grant project should serve as a launching point for a comprehensive Safe Routes to School Program completed as part of this project. Finally, the planned Class III bicycle facilities on Potrero Avenue and Everett Street must be implemented by the project if not done so by the City before the project is built.

- Page 4.8-39, since no detailed evaluation appears to have been presented or back-up information provided, we have concerns regarding the following findings:
 - › “project site design has been required to conform to City street design standards and would not create any significant impacts or impediments to pedestrians, bicyclists or traffic operations”;
 - › “AC Transit and the City traffic engineering have reviewed all of these streets, and have found the street widths do meet the desired standards;
 - › “it was determined that the street widths will be able to accommodate the site access and circulation needs of the proposed project.”

These findings need to be substantiated including references/sources of information and further evaluation. It is not clear which City street standards are being referred to. The classification and new characteristics of nearby residential streets should be addressed. El Cerrito Municipal Code Section 18.24.040 indicates the following minimum street widths and allows for increased widths where probable traffic conditions warrant such:

- › Major streets or highways, Minimum pavement width: Fifty-six feet in residential areas and sixty-four feet in commercial areas.
- › Secondary streets or highways, Minimum pavement width: Forty feet.
- › Minor streets, Minimum pavement width: Thirty-four feet.

Because the project is altering the character of some of the local streets, the project's conformance to the City's street design standards is questionable without mitigation measures addressing project impacts.

- Page 4.8-39 – The Emergency Vehicle Access section does not appear to indicate how emergency providers would know of any congestion at a specific access point in order to choose the most appropriate path in advance or how emergency response times would be affected if an emergency vehicle had to detour once en-route.

- Pages 4.8-39 thru 40, and 4.8-47 - To fully address public and City concerns regarding congestion, transit access and emergency vehicle access, the EIR should analyze the following items for the local residential streets in the area:
 - › existing street curb-to-curb widths, parking and travel lanes widths;
 - › existing and proposed sidewalks surrounding the school;
 - › existing and proposed length (considering new curb cuts) of loading zones (white and green curb), extended bus zones, and disabled on-street parking;
 - › existing and anticipated drop-off and pick-up operations including queuing, bus dwell times, and double parking;
 - › exhibit illustrating proposed bus turnout;
 - › required lane widths and turning radii for roads carrying AC Transit buses;
 - › required clearances for emergency vehicle access and response routes;
 - › increases in daily traffic volumes in relation to the existing average daily traffic volumes.
- Page 4.8-40 - To fully evaluate Significance Criteria 8, the parking evaluation should account for removal/changes in on-street parking restrictions and supply due to the new curb cuts, loading zones and bus zones. The parking demand rates that were applied, and resulting demand for on-site versus off-site (on-street), must be compared to the proposed on-site versus off-site parking supply. A table would be helpful.
- Page 4.8-47 – States that preliminary recommendations for changes to existing AC Transit bus routes have been identified in this study. The evaluation of transit impacts should consider alternative streets for AC Transit bus zones, such as Norvell Street, which is slightly wider in some locations. Those routes should then be finalized in concert with AC Transit and the City, and should be incorporated into the traffic study and mitigations in the EIR.
- Page 4.8-54, Impact and Mitigation Measures 4.8.2, additional mitigation measures will most likely be required to address the issues and concerns identified above.
- Regarding AC Transit routes, in the past AC Transit has refused to pick up the students at Portola Middle School, opting instead to pick them up at the intersection of Moeser Lane and San Pablo Avenue. This has caused numerous problems over the years to residents along Moeser Lane and merchants locate along Moeser Lane and San Pablo Avenue. The City should have significant input into the re-routing plan.
- Page 4.8-54, Impact 4.8.3 – The closure of the existing Portola Middle School Campus will require that all unnecessary school signs and markings be removed.
- Mitigation Measures 4.8.5 and 4.8.6 - The study asserts that the student reassignment to Fairmont Elementary School would have a “less than significant impact on traffic circulation and parking.” Reassigned students will go to Fairmont, Stege and Mira Vista Elementary Schools. Castro Elementary School’s student population is listed as a working capacity of 318 students. If the students are divided evenly, 106 students and the associated staff will be sent to each elementary school. If Fairmont has a student population similar to that of Castro, that will be a 33% increase in Fairmont’s population. In light of the requests the EIR

Cerrito Police Department receives every year from Fairmont School regarding the need for personnel to be assigned to traffic control, adding 106 students from Castro should not be a "less than significant impact". We can also expect some impact on traffic from the Mira Vista site given its proximity to El Cerrito.

- Section 4.8, Other - Technical information does not appear to have been provided, should be reevaluated, or may be incorrect as follows:
 - The Richmond-Blake intersection has an existing all-way stop control and must be reevaluated.
 - The Potrero Avenue approach to Richmond Street does not have split or protected left-turn phasing. Queuing and level of services must be reevaluated for this intersection.
 - Provide detailed intersection turning movement counts and daily traffic counts in Appendix F.
 - The LOS measure reported for the one signalized intersection is based on the HCM method and not the CCTA method. The CCTA measure must be provided.
 - Provide level of service calculations for Background Conditions in the appendix.
 - The City Hall Transportation Analysis (Dowling, 2004) found the intersection of Richmond Street and Schmidt Lane to operate at LOS E and B during the AM and PM Peak hours, respectively, under Existing Conditions; and LOS F and C under Cumulative Conditions. The discrepancies in LOS between that study and the EIR need to be explained.

Air Quality (Chapter 4.9)

- The analysis in the Air Quality chapter does not appear to address City policies, but instead focuses on vehicle miles traveled and BAAQMD standards.

Noise (Chapter 4.10)

- The EIR appears to need further analysis to support its conclusion that the impacts from noise from outdoor uses at the proposed new Portola Middle School site are less than significant on the surrounding residential area. With limited analysis, the EIR generally concludes that the impacts would be similar to the existing elementary school and, therefore, less than significant. The EIR does not consider the significant increase from students currently using the site (260 students) to the enrollment capacity for the new middle school (600 students). The EIR should analyze the noise from this increase in students and the older age of the middle school students in evaluating whether the impact is significant.
- Page 4.10-14 describes interior noise levels with windows closed during the construction period for the new school. This discussion does not appear to address whether windows would normally be closed during the time of year that construction would occur. This should be considered in calculating and mitigating construction noise. Roof construction should also be included in this analysis.
- Page 4.10-15 provides for temporary barriers to mitigate construction noise at Cameron School by 6-7 dB. Please provide methodology or reference as to how this effect was calculated.

- Page 4.10-16 - The study needs to identify the duration of time during which noise from the wrecking ball will occur.
- Pile driving has proven to be a significant concern and impact to surrounding neighborhoods during construction. Will the construction methods involve pile driving? If so, mitigation measures should be provided that address the noise and vibration impacts.
- Page 4.10-19, please provide means of determining how it was determined that onsite recreation and park activities would not be anticipated to result in a noticeable increase (3 dBA) in ambient noise.
- Table 4.10.9, do noise levels in this table include bus traffic?

Public Services and Utilities (Chapter 4.11)

- The EIR identifies the unavailability during construction of the existing Castro Elementary School as an emergency shelter, as a less than significant impact. While the unavailability would only be temporary, it would be helpful if the EIR discussed the availability of other school sites that can serve emergency shelter needs.
- The impact of the closure of the existing Portola Middle School on fire and police protection and emergency response may be potentially significant and the EIR should require mitigation. The EIR concludes that this impact is less than significant because the WCCUSD proposes to keep all fire and life safety systems operational after vacating the school (Impact 4.11.1.5 & 4.11.2.5). However, maintaining systems in operation does not seem sufficient to reduce this impact to less than significant. The EIR should include mitigation to address this impact as follows: Upon closure of the existing Portola Middle School, the WCCUSD shall provide onsite fire protection and security measures, such as guards, lighting, and vandalism protection to the satisfaction of the El Cerrito Police and Fire Chiefs. Existing fire and other life safety systems at the school shall remain functional and in effect upon closure, including alarm systems, electricity, lighting and water supply.
- The EIR's conclusion that the project's contribution to cumulative impacts to fire, police and emergency services is less than cumulatively considerable does not appear to be supported by sufficient evidence and analysis (Impact 4.11.1.8 & 4.11.2.9). The EIR's statement that the "proposed project would provide adequate funding for its contribution to [service needs] as required" does not appear to be supported by information referenced in these two impact areas. The EIR's mitigation measures do not require Project funding for these services. The EIR should identify the Project impact as cumulatively considerable and require mitigation to the satisfaction of the El Cerrito Police and Fire Chiefs.
- The EIR's conclusion that the impact of the proposed Project on the Cameron School is less than significant with a mitigation measure requiring notification and information to students and parents, does not appear sufficient to reduce the identified impacts to less than significant. It should be supplemented with specific mitigations such as providing measures for alternative emergency, pedestrian, vehicular and bike access to the Cameron School, if access is affected by construction (Impact 4.11.3.2).

- The EIR appears to have inadequate mitigation for the potentially significant impact of the new Portola Middle School on Castro Park (Impact 4.11.4.5). Potential impacts are discussed in this section, such as more active and frequent activities in the park, and the need for more frequent maintenance. However these impacts are not quantified in the EIR and specific mitigations are not provided to offset those impacts. Specific analysis of the impacts and related mitigation measures appear needed to address these impacts. The only mitigation listed that addresses this impact (in part) is the requirement for WCCUSD to enter into an agreement with City Departments to address park use issues. The EIR should quantify the impacts based on projected park usage, and include specific mitigation if warranted, such as increased maintenance, installation of synthetic turf, and related funding to address those impacts on Castro Park. The EIR should also consider whether use of the existing Portola lower playfield for public recreation would help mitigate the impacts due to the Project generated increased use of Castro Park.
- The EIR should include mitigation to address the increase in use of non-motorized transportation facilities (including the Ohlone Greenway) caused by the proposed Project. The EIR acknowledges that the proposed project could require construction or expansion of bicycle and pedestrian facilities in the vicinity of the new Portola Middle School, but does not specify timing or how such improvements would be provided and funded. The EIR should quantify the impacts based on projected facilities usage, and include specific mitigation to address those impacts, if needed.
- Mitigation Measure 4.11.2.4d - Notification of the contact person/entity should be expanded beyond 500 feet to include all residences that front the route to and from the location where the buses will pick up the students.
- Mitigation Measure 4.11.2.4e - The number of crossing guards proposed for this project appears inconsistent with crossing guard numbers at other schools.
- A number of Section 4.8 and 4.11 Mitigation Measures would require considerable City of El Cerrito public safety personnel and other resources to manage, supervise and monitor. The EIR should have more detailed analysis to quantify these needs, and describe how Police and Fire resources would be provided and funded for anticipated and unanticipated needs.
- Page 4.11-19, the text states that typically an SRO is funded by the District as is currently done at the existing Portola Middle School. Therefore, Mitigation Measure 4.11.2.4a should stipulate that the District will fund this SRO and the related equipment. In order to mitigate the increased demands on City public safety services as discussed above, the District could consider funding two dedicated SROs for the new Portola School.
- Impact 4.11.4.2 states there is no mitigation required. However, the City believes there will be a reduced capacity of the new facilities constructed at the project site. The current gymnasium at Portola Middle School has a capacity of 1,000. The future site of Portola Middle School will be built for a significantly smaller population. The City and WCCUSD have been working together by written agreement for over 50 years, providing access to recreation facilities for the entire community to enjoy. The City of El Cerrito has had access to the existing Portola Middle School Gymnasium for the last 50 years, and it has become an integral part of the Recreation Department's programs and services. Even though the

proposed project has a gymnasium included, it is our belief that the City could provide optimal gymnasium use year round by offering a wide range of programs and services for all ages to enjoy. The existing Portola Middle School Gymnasium was retrofitted after the Loma-Prieta Earthquake of 1989. If the existing Portola Middle School were demolished, the City of El Cerrito would propose that the District consider separating out the parcel of land containing the existing gymnasium, for continued use by the City of El Cerrito, to mitigate impacts due to the new smaller gymnasium.

- Mitigation Measure 4.11.4.4 - The City of El Cerrito would like to minimize any potential misunderstandings at the conclusion of the proposed Castro/New Portola Middle School project by ensuring that the WCCUSD and the City of El Cerrito adhere to the Joint Use Facilities Agreement, dated June 28, 2006, entered into by and between the City of El Cerrito and the West Contra Costa Unified School District (Attachment 2 – copy of signed Agreement).

Alternatives (Chapter 6.0)

- The analysis of the alternatives does not appear complete and consistent. For each alternative, the EIR should analyze the environmental impacts of the alternative and compare the impacts of the alternative to the impact of the proposed project.
- 6.0-2 - Alternative 4 - The Dolan Lumber Yard may also involve extensive remediation of contaminated soils.

Technical Appendix C – Historic Resource Evaluation

- The project proposes to close the existing Portola Middle School and relocate middle school operations to the existing Castro Elementary School, which will be modified for that purpose. No physical changes are currently proposed to the existing Portola Middle School, but future disposition through sale for adaptive reuse, stabilization, or demolition is anticipated. The EIR identifies the potential disposition as significant unavoidable Impact 4.4.5 (along with related cumulative impact 4.4.13). The EIR text states that the school "appears" to meet the criteria for inclusion in the California and National historic registers because of its design and association with architect John Carl Warnecke. The related criteria are identified on p. 4.4-9 of the draft EIR, and include a resource that "embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values..."

The Historical Resources Evaluation in Appendix C of the EIR provides more information on this criterion. Item B10 on p. 2 identifies the existing Portola Middle School as the work of a master, further explaining that the school is an "important example of the early contextual work" of Warnecke, and one of his first commissions for the Richmond Unified School District. The discussion states the school is an "excellent example of his earlier work" and states that Warnecke went on to become a famed architect of significant sites such as the John F. Kennedy gravesite in Arlington National Cemetery, and Lafayette Square in Washington D.C. This discussion clearly identifies Warnecke as an architect of note, but does not explain how the Portola Middle School is representative of the elements contributing to his importance. The text describing the school as an example of his "early contextual work" provides little substantive information. There is no description of

Warnecke's signature style or elements, or whether they are incipient or present in the school. There is no substantive "link" between the school as an early work and his later works. Thus, while the Portola Middle School is clearly among his works, it is not clear from the EIR that it is representative of his work.

- Identifying a resource as potentially being historically significant can have important implications for potential future reuse or demolition. Additional information should be provided that makes a definitive determination whether or not the building can be listed as historic under National and/or California criteria.

Again, we support the WCCUSD's efforts to address the seismic safety concerns at the existing Portola Middle School site, and to provide high quality school facilities that are compatible with their surroundings. Thank you for the opportunity to comment on the EIR. Although we had a number of comments on the EIR, we believe it made a good attempt to address a complex subject. Please contact Planning Manager Jennifer Carman at 510/215-4332, or I at 510/215-4308, should you have any questions concerning the comments contained in this letter.

Sincerely,

Mitch Oshinsky
Community Development Director

Attachments:

1. California Public Schools – District Report Enrollment 2004-2008
2. Copy of Signed Joint Facility Use Agreement

cc: Mayor and City Council
Scott Hanin, City Manager