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Eric Anderson, Senior Planner  
City of Mountain View  
Community Development Department  
500 Castro Street, P.O. Box 7540  
Mountain View, CA 94039

Dear Mr. Anderson:

I write to share our objections to proposed responses to the school districts' comment letter on the draft East Whisman Precise Plan and Draft Environmental Impact Report for the East Whisman Precise Plan Project.

Due to the City's inadequate additional analysis and explanations that are not supported by substantial evidence, the City should revisit this with further environmental analysis and recirculation before City Council considers approval of this project. Specifically:

**Response D1: Neither the Draft EIR nor the Final EIR identifies any intersection at a nearby school that was analyzed during student drop-off or pick-up times.**

"The Draft EIR includes a comprehensive transportation analysis that describes the effects of project traffic on 49 intersections in the area under Cumulative Conditions. This analysis considers residents living in the Precise Plan area traveling to nearby schools to drop-off and pick-up students as part of the resident's vehicle trip; therefore, it describes the effects of project traffic on schools located near these study intersections." (on page 21 of the September 2019 Screencheck Final EIR ("Final EIR"))

Contrary to the City's statement, the transportation analysis is not comprehensive. In particular, the inclusion of drop-off and pick-up of Project students in a resident's vehicle trip only accounts for the length of a trip. It does not consider the intersections at the receiving schools nor does it account for queue lengths fronting those schools.

## **Response D2: School District Strategy should be a binding requirement on the Developer**

The response notes no response is required (on page 22 of the Final EIR). Although Comment D.2 is a comment on the Draft East Whisman Precise Plan and not on the Draft EIR, the plan should nonetheless be modified to ensure that the School District Strategy is a binding requirement on the Developer.

## **Response D3: The School District Strategy should be a mitigation measure.**

The City has voiced its commitment to the School District Strategy as a mechanism for gathering sufficient funding for school facilities. On page 23 of the Final EIR, the response argues that Government Code section 65996 provides all the available mitigation for the Project's impact on school facilities and no specific mitigation measure is required. The District believes that the City can turn that commitment to the School District Strategy into an enforceable obligation on the Applicant by making the School District Strategy into a mitigation measure.

## **Response D4: Neither the Draft EIR nor the Final EIR evaluates the Project's traffic impacts at the schools that would serve the Project.**

The response again claims that the traffic study sufficiently accounted for the Project's traffic impacts at the receiving schools because drop-off and pick-up of the Project's students were included in the vehicle trips (On pages 23 and 24 of the Final EIR). The inclusion of student trips only describes the length of the Project's trips, not where those trips go. Unfortunately, neither the Draft EIR nor the Final EIR evaluates the Project's traffic impacts (i.e., intersection LOS, street capacity, and queue delays) at the schools that would serve the Project. In fact, the Fehr & Peers' Program-Level Transportation Analysis does not mention a single, particular school. And while the City's General Plan Policy MOB 1.6 has a policy for traffic calming at schools, none of the 49 studied intersections are at a receiving school. Without a specific receiving school analysis in the Draft EIR, the Project's Draft EIR does not demonstrate that it is consistent with the General Plan.

### **It fails to provide justification for deferring a sufficient environmental analysis**

The response speculates that the Project could provide housing where students would live closer to their school and that VMT would be reduced and this would be analyzed in supplementary environmental analyses (on page 24 of the Final EIR). In CEQA terms, this response is a “bare conclusion” without supporting substantial evidence. It fails to provide justification for deferring a sufficient environmental analysis. The Draft EIR identifies nearby schools in the Public Services and Recreation section, but no specific school is mentioned in the Transportation section of the Draft EIR or the Final EIR.

### **Response D5: No traffic impact analysis on receiving schools or any further analysis**

The response only states that student vehicle trips were included in vehicle trip estimates (on page 24 of the Final EIR). This response fails to acknowledge that there is no traffic impact analysis on receiving schools and ignores the request for further analysis and recirculation of the Draft EIR. Additionally, a new traffic pattern has been established with the opening of Jose Antonio Vargas Elementary in August and the implementation of neighborhood schools.

Thank you for the opportunity to comment on these items. It is fair to say that developing a consistent school strategy would not only create a clear path forward for future projects but also eliminate the concerns that we have raised with the current EIR. We look forward to collaborating to plan for growth in our schools and community.

Respectfully,



Dr. Ayindé Rudolph, Superintendent

cc: Mountain View City Council  
Dan Rich, City Manager  
Phil Henderson (OHSB)