



LOS ALTOS SCHOOL DISTRICT

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City of Los Altos
1 N. San Antonio Road
Los Altos, CA 94022

RE: The EIR on the Pilgrim Haven Construction Project

This letter outlines the concerns and issues and some suggested mitigations to the above referenced project proposed for this site, in response to the EIR conducted by the city.

As a background, The Los Altos School district has over 4,300 students attending 9 schools in the greater Los Altos community and employs over 500 staff members. The district has a long history of educational success and excellence, consistently ranking number one in Santa Clara County and ranked in the top one or two spot in the State of California. We are representing the interests of the students and parents of that community in this letter. It should be noted that the proposed project will directly affect the adjacent Santa Rita School as well as the nearby Egan Intermediate School and Bullis Charter School. There are 550 students attending Santa Rita school on a property directly adjacent to the Pilgrim Haven Site, 550 students attending Egan School and an additional 330 students at the Bullis Charter School located on the Egan campus located within the vicinity of the project on the corner of West Portola and San Antonio. This group defines our community of interest for these comments and the interests of our community are with the success of our children in our schools.

Before we address specific issues we want to express our concern that the draft EIR hardly mentions Santa Rita School, an immediate neighbor of Pilgrim Haven. This project will directly affect the learning environment of the 550 students at Santa Rita and this should be noted. We also are very concerned that the project will four years to complete. This has the potential to disrupt the school, as well as transportation to and from the school, for a very long time.

We have several comments that we feel must be addressed in the EIR. The draft EIR should be restructured to address these concerns adequately.

Density and Height

The buildings as proposed substantially increase the density and height of buildings next to the playing fields, amphitheatre, classrooms and multipurpose room at the boundary of the site next to Santa Rita School. Possible impacts include:

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- 1) Decreased daylight to the school site
- 2) Change in the runoff planes of water to the site, threatening playing fields and buildings
- 3) Increased visibility of the school playing fields from the buildings being added to the site, reducing safety and perceived security for our students

The project could reduce these impacts by keeping the total height at its current level, reducing the portion of the building that faces the playing fields and classrooms, and reducing the number of windows and patios that face the school. In addition, the water runoff issues can be mitigated with both a lower portion of the site covered with concrete and careful implementation of the drainage systems. We did not see any analysis in the EIR that addresses these concerns.

While the report states that reduced density is not an acceptable alternative due to it not being financially feasible, environmental impact and safety concerns should take precedence over financial concerns.

Noise

The noise during construction is of critical concern, as is any incremental noise produced from a denser, larger facility after construction is completed. Neither have been addressed adequately in the report and deserve attention and mitigation.

- 1) **Construction Noise:** There likely will be significant noise from demolition, truck traffic, machinery and the like upwards of 100db during the day, while school is in session. This is very challenging to the environment of a school, particularly one that operates a significant portion of its program outside. During the school day, hammering, truck backups, etc. should be given severe limits and adhere to a strict schedule that allows the school to operate safely in its current form. Acoustic Monitoring is proposed, but only by responding to complaints and not in real time. There should be full time acoustic monitoring during construction to insure noise levels are minimized. In addition, it should be noted that the Santa Rita School holds an outdoor assembly every Friday morning from 8:20am to 9:00am. Construction noise should be held to a minimum during the period to insure an effective assembly can continue unaffected
- 2) **Post Construction Noise:** It is clear that additional noise will result from the additional residents and critical care unit that is added to the facility, and this must be considered and addressed for mitigation. Will there be an outdoor PA? Will there be more sirens from ambulances? Will there be increased noise from increased traffic activity? None of these are addressed in the draft EIR.

Pollution

Although the report does indicate some of the risks from Lead and Asbestos, it does not adequately address the types of mitigations that are commonly used to eliminate the risks and issues that this kind of project might present to an operating school with children between 4 and 12 years old. For example, the levels of toxins that are currently in the Santa Rita playing fields have been measured and monitored. We would want to be assured that the school will continue to be protected. Understanding when these risks are going to be introduced to the environment,

and if possible not creating these risks during school days (e.g. doing them during the summer) and then properly screening and cleaning the school site after these events is essential. We would propose:

- 1) The screening systems that are proposed as mitigations to airborne toxins be improved to provide a higher standard of protection, including full tenting of areas under demolition careful monitoring of weather conditions, particularly wind, to insure that the risk of airborne toxins is minimized by restricting demolition on windy days.
- 2) Additional unforeseen hazards need to be monitored and managed. Should any water wells, fuel or other storage tanks or other unknown underground toxins be discovered during construction then immediate notification of the city and appropriate modifications to the construction management process should be undertaken to minimize risks to the children near the site.

Safety

Managing such a large scale and lengthy project is challenging, particularly with the presence of so many pedestrians and especially children walking and biking to school. In addition the risk of bringing so many construction workers into a school community introduces additional risks to the safety and protection of our children. These risks are significant and are inadequately addressed in the EIR. Further, traffic and walking lanes to and from the construction site are likely to experience significant increased traffic, parking and debris during construction. This must be addressed as well. Finally, the finished project will create new safety risks in the community: many additional driveways onto Pine, limited visibility from those driveways to pedestrian and bicycle traffic, and the introduction of an underground parking garage with attendant additional safety risks from cars exiting up a ramp at higher speeds than required to creep through a driveway.

We believe several mitigations can be achieved:

- 1) Restrict all demolition and delivery vehicles from traveling through the school traffic areas (Pine Lane, Los Altos Avenue and West Portola) between the hours of 8am and 9am, and 2pm and 3pm.
- 2) Do not allow any construction or construction worker vehicles parking on Pine Lane or Los Altos Avenue, keeping bike lanes free for riders.
- 3) Require flagmen and crossing guards at entrances and exits for the site.
- 4) Provide "safe routes to school" around the site during and after construction, including pathways that allow children to safely enter the school through Pilgrim Haven during and after construction.
- 5) Sidewalks can be installed on the north side of Pine Lane replacing the "berm" that is now used as a safety buffer to provide a safe route on both sides of Pine, and the current asphalt walkway on Los Altos Avenue should be replaced with concrete.
- 6) A crosswalk should be installed at the end of Guadalupe crossing over to the north side of Pine for children and worker safety.

Traffic Study

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The traffic study relies on data collected on a Wednesday in November 2006. This is highly unreliable data as a measure of actual traffic patterns in that Wednesday is a "late start" day at the nearby Egan Intermediate School. School starts at 9:00 am on Wednesday s, which is 40 to 60 minutes later than on every other day of the week. The data simply is not representative of the real traffic patterns.

Traffic on Los Altos Avenue and Pine Lane likely is significantly worse on days other than Wednesday. The project will make it worse still. There have been a number of complaints from parents about the safety of that intersection, which coupled with an injury of a senior citizen in the crosswalk during that time of day makes us very concerned about our students' safety. There seems to be no recognition of these facts in the study itself. Finally, there is no analysis of walking, biking or other pedestrian traffic, which is quite heavy particularly on Los Altos Avenue and Pine Lane. We feel these traffic patterns should be studied as well in order to plan accordingly.

The proposed change to the Spagnoli property, rezoning it from residential to commercial as part of this project, concerns us as well. This property's current configuration (essentially an open orchard) allows for very good visibility from Los Altos Avenue to Pine Lane of bike and pedestrian traffic. The proposed project built at that corner likely will reduce this visibility substantially. This is not mentioned in the EIR and could have a significant impact on pedestrian and bike safety and should be evaluated carefully for safety risks.

Sincerely,

Tim Justus
District Superintendent