

Responses to Public Comments
Stratford Preparatory School
Special Use Permit
(SP23-002)



December 2023

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Appendix A: Draft Comment Letters

Section 1.0 Introduction

The Initial Study/Negative Declaration (IS/ND) for the Stratford Preparatory Special Use Permit project (project) was prepared in compliance with the requirements of the California Environmental Quality Act (CEQA). The 20-day public circulation period for the IS/ND started August 22, 2023, and ended September 12, 2023. The following pages contain responses to comments submitted by agencies, organizations, and individuals during the IS/ND public review period. Copies of the comment letters are attached to this document in Appendix A.

Pursuant to CEQA Guidelines §15073.5, the recirculation of the ND is required when the document must be “substantially revised” after public notice of its availability. A “substantial revision” is defined as:

- (1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance; or
- (2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

CEQA does not require formal responses to comments on an IS/ND and the decision-making body shall adopt the proposed ND only if it finds on the basis of the whole record before it, that there is no substantial evidence that the project will have a significant effect on the environment and the ND reflects the lead agency’s independent judgment and analysis [CEQA Guidelines §15074(b)].

Section 2.0 Responses to Comments Received on Draft IS/ND

Comments are organized under headings containing the source of the letter and its date. The specific comments from each of the letters and/or emails are presented, with each response to that specific comment directly following. Copies of the letters and emails received by the City of San José are included in their entirety in Appendix A of this document. Comments received on the Draft IS/ND are listed below.

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Regional and Local Agencies

A. Pacific Gas and Electric Company (dated August 31, 2023)

Comment A.1: Thank you for providing PG&E the opportunity to review the proposed plans for 3800 Blackford Ave dated 8/22/2023. Our review indicates the proposed improvements do not appear to directly interfere with existing PG&E facilities or impact our easement rights.

Please note this is our preliminary review and PG&E reserves the right for additional future review as needed. This letter shall not in any way alter, modify, or terminate any provision of any existing easement rights. If there are subsequent modifications made to the design, we ask that you resubmit the plans to the email address listed below.

If the project requires PG&E gas or electrical service in the future, please continue to work with PG&E's Service Planning department: <https://www.pge.com/cco/>.

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

Response A.1: As stated on page 111 of the Initial Study, the project site is currently served by existing electrical and natural gas services. In the event that future gas or electrical services are required, the applicant would coordinate with PG&E's Service Planning department.

The project proposes to increase enrollment of an existing school campus by occupying existing buildings, and no new construction or site disturbance is proposed. As such, no digging or excavation is proposed. The comment does not raise any issues about the adequacy of the Initial Study, therefore, no further response is required.

B. County of Santa Clara – Roads and Airports (dated September 12, 2023)

Comment B.1: The County of Santa Clara Roads and Airports Department (The County) appreciates the opportunity to review the Notice of CEQA Posting for Stratford Preparatory School IS/ND (SP23-002). We submit the following comments:

It is stated in the IS/ND that

- *"The project applicant should work with City staff in determining an appropriate contribution towards the implementation of multi-modal improvements to the transportation system in the area surrounding the San Tomas Expressway and Moorpark Avenue intersection."*

- *“It was found that there are no feasible improvements possible at the San Tomas Expressway & Moorpark Avenue intersection.”*
- *“City staff will determine whether the project may be required to install ADA-compliant ramps at the San Tomas Expressway/Moorpark Avenue and San Tomas Expressway/Williams Road intersections.”*

Therefore, since the Project will adversely affect the intersection of San Tomas Expressway & Moorpark Ave, (first and second bullets) the project should provide a fair-share contribution towards widening the San Tomas Expressway.

Response B.1: As discussed on page 96 of the Initial Study, a project’s effects on level of service (LOS) can no longer be considered an impact on the environment. Consistent with the City’s Transportation Analysis Handbook, a Local Transportation Analysis was prepared for the project (refer to Appendix D of the Initial Study). The results of the analysis show that the added trips as a result of the proposed project would result in an adverse effect on the San Tomas Expressway and Moorpark Avenue intersection.

As discussed on page vii of the Transportation Analysis (refer to Appendix D), the widening of San Tomas Expressway to eight lanes between El Camino Real and Williams Road is identified in the County’s Comprehensive Expressway Plan. The widening of San Tomas Expressway between Homestead Road and Stevens Creek is part of the Measure B Expressway Improvement Program.

The applicant is coordinating with the City to provide a fair share contribution of \$226,919 prior to Planning Permit approval towards the widening of San Tomas Expressway. This comment does not provide new information that would change the analysis or conclusions disclosed in the Initial Study.

Comment B.2: Regarding the third bullet, the project should also determine if improvement is needed in the short term since there is no identified schedule for widening San Tomas Expressway.

Response B.2: As documented in the Transportation Analysis (refer to Appendix D of the Initial Study), the intersection is shown to operate at LOS F conditions without project traffic. As noted in response B.1, the applicant is working with the City to provide a fair share contribution to the San Tomas Expressway widening. The improvement is a Measure B improvement for which funding must be identified by the County and/or contributions by development projects, no single project can implement the improvement. This comment does not provide new information that would change the analysis or conclusions disclosed in the Initial Study.

Comment B.3: We also do not recommend the signalization of Boynton and Moorpark due to their proximity to San Tomas and Moorpark (~500ft West) due to queue spillback issues observe during both AM & PM Peak. The city should consider providing a “Keep Clear” zone at the intersection of

Boynton and Moorpark to prevent vehicle queue from blocking left-turning vehicles from Moorpark onto Boynton.

Response B.3: As discussed on page 98 of the Initial Study, the Boynton and Moorpark intersection meets the signal warrant; however, the City has determined that a traffic signal is not being considered at this intersection at this time.

Organizations, Businesses, and Individuals

C. Unidentified Caller (dated September 9, 2023)

Comment C.1: The City received a voice mail from an unidentified individual that lives in proximity to the Stratford Preparatory School. The individual expressed concern that an increase in students would result in more traffic on Blackford Avenue during school drop-off and pick-up.

Response C.1: As discussed on page 96 of the Initial Study, a project's effects on LOS can no longer be considered an impact on the environment. Consistent with the City's Transportation Analysis Handbook, a Local Transportation Analysis was prepared (refer to Appendix D of the Initial Study). The analysis found that the traffic volume increase from the project may be perceptible to residents along Blackford Avenue, as noted by the commenter.¹ Therefore, as stated on page 100 of the Initial Study, the project would be required to implement comprehensive traffic calming measures in accordance with the City's Traffic Calming Policy. These measures would include the following:

- Implementation of two radar speed signs along Blackford Avenue approaching school.
- Installation of edgelines along both sides of Boynton Avenue from Moorpark Ave to Williams Road to narrow the existing travel lane width to 10'.
- Providing enhanced high-visibility crosswalk improvements at all legs of intersections of Williams Road/Boynton Avenue, Blackford Avenue /Boynton Avenue and Manzanita Drive/Hibiscus Lane intersections.
- Potentially, installing edgelines along both sides of Blackford Avenue from Saratoga Avenue to Boynton Avenue.

With implementation of the above traffic calming measures, the project would be consistent with the City's Traffic Calming Policy. This comment does not provide new information that would change the analysis or conclusions disclosed in the Initial Study.

¹ The analysis also concluded that traffic volume increase may be perceptible along Hibiscus Lane and Rebecca Way.

Section 3.0 Conclusion

The comments received on the IS/ND did not raise any new issues about the project's environmental impacts or provide information indicating the project would result in new environmental impacts or impacts substantially greater in severity than disclosed in the IS/ND and recirculation of the ND is not required.

Appendix A: IS/ND Comment Letters



August 31, 2023

Kara Hawkins
City of San Jose
200 East Santa Clara St
San Jose, CA 95113

Re: SP23-002
Stratford Preparatory School

Dear Kara Hawkins,

Thank you for providing PG&E the opportunity to review the proposed plans for 3800 Blackford Ave dated 8/22/2023. Our review indicates the proposed improvements do not appear to directly interfere with existing PG&E facilities or impact our easement rights.

Please note this is our preliminary review and PG&E reserves the right for additional future review as needed. This letter shall not in any way alter, modify, or terminate any provision of any existing easement rights. If there are subsequent modifications made to the design, we ask that you resubmit the plans to the email address listed below.

If the project requires PG&E gas or electrical service in the future, please continue to work with PG&E's Service Planning department: <https://www.pge.com/cco/>.

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding our response, please contact the PG&E Plan Review Team at pgeplanreview@pge.com.

Sincerely,

PG&E Plan Review Team
Land Management

A.1

County of Santa Clara

Roads and Airports Department

101 Skyport Drive
San Jose, CA 95110-1302
(408) 573-2460 FAX 441-0276



September 12, 2023

Kara Hawkins,
Planner III
Planning, Building & Code Enforcement
City of San José
200 East Santa Clara Street
kara.hawkins@sanjoseca.gov

SUBJECT: Notice Of CEQA Posting for Stratford Preparatory School IS/ND (SP23-002)

The County of Santa Clara Roads and Airports Department (The County) appreciates the opportunity to review the Notice Of CEQA Posting for Stratford Preparatory School IS/ND (SP23-002). We submit the following comments:

It is stated in the IS/ND that

- *“The project applicant should work with City staff in determining an appropriate contribution towards the implementation of multi-modal improvements to the transportation system in the area surrounding the San Tomas Expressway and Moorpark Avenue intersection.”*
- *“It was found that there are no feasible improvements possible at the San Tomas Expressway & Moorpark Avenue intersection.”*
- *“City staff will determine whether the project may be required to install ADA-compliant ramps at the San Tomas Expressway/Moorpark Avenue and San Tomas Expressway/Williams Road intersections.”*

Therefore, since the Project will adversely affect the intersection of San Tomas Expressway & Moorpark Ave, (first and second bullets) the project should provide a fair-share contribution towards widening the San Tomas Expressway.

Regarding the third bullet, the project should also determine if improvement is needed in the short term since there is no identified schedule for widening San Tomas Expressway.

We also do not recommend the signalization of Boynton and Moorpark due to their proximity to San Tomas and Moorpark (~500ft West) due to queue spillback issues observed during both AM & PM Peak. The city should consider providing a “Keep Clear” zone at the intersection of Boynton and Moorpark to prevent vehicle queue from blocking left-turning vehicles from Moorpark onto Boynton.

Thank you again for your continued outreach and coordination with the County. If you have any questions or concerns about these comments, please feel free to contact me at ben.aghegnehu@rda.sccgov.org

Thank you,