#### ADDENDUM TO CEQA INITIAL STUDY FOR A.M. WINN SCHOOL CLOSURE

#### INTRODUCTION

On February 16, 2012, the Board of Education considered the closure of A.M. Winn Elementary School and received public comments regarding the closure. Several of these comments are relevant to the CEQA analysis of transportation. Issues of concern raised at the meeting were as follows:

- 1) Although the District has a policy to bus students in an attendance where significant safety issues are present to their assigned school, this policy cannot be feasibly implemented due to recent severe budget constraints facing the District, and the Board of Education cannot therefore, ensure busing for students.
- 2) James Marshall School is located 1.8 miles from A.M. Winn School and Abraham Lincoln School is located 1 mile from A.M. Winn School. Thus, it is reasonable to assume that a substantial portion of students re-assigned to these schools would be required to walk or be driven over 1 mile and in some instances 2 miles to their new school location in the absence of busing as an option.
- 3) Absent busing as an option, issues were also raised regarding the safety of elementary school students crossing Bradshaw (a 6 lane thoroughfare) to access James Marshall School, or Routier Road (a 2 arterial with limited crossing signals) to access Abraham Lincoln School.

## **ADDENDUM TO THE CEQA ANALYSIS**

Based on the new information and issues raised at the Board of Education meeting of February 16, 2012, the following additional information and revisions should be included in the CEQA Initial Study prepared for A.M. Winn School Closure:

## **Transportation Text Corrections and Clarifications**

#### **Standards of Significance**

Project Level of Service (LOS) is a standard frequently used to determine if traffic or congestion is unacceptable. In the City of Rancho Cordova, LOS D is generally considered acceptable and in some cases the City may consider LOS E or F acceptable. The reason the City accepts a lower level of service is to encourage transit use and attain other adopted goals. Policy C.1.12 of the City of Rancho Cordova's Circulation Element states: "Seek to maintain operations on all roadways and intersections at Level of Service D or better at all times, including peak travel times, unless maintaining this Level of Service would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals. Congestion in excess of Level of Service D may be accepted in these cases, provided that provisions are made to improve traffic flow and/or promote non-vehicular transportation as part of a development project or a City-initiated project."

James Marshall Elementary School is located in the unincorporated portion of the County of Sacramento. James Marshall School is located in the "urban policy boundary" not the urban services boundary of the County. Therefore, LOS D is applicable.

The common standard of significance for bicycle and pedestrian facilities in the City of Rancho Cordova General Plan EIR states that "the project is considered to have a significant effect on bike and pedestrian facilities if it would result in adverse effects to existing bikeways or pedestrian facilities that would discourage their use and result in safety issues" or if a project "would conflict with policies, plans, or programs supporting alternative transportation or increase demands for transit facilities greater than planned capacity (e.g., transit service, carpooling, bicycling, walking).

## Traffic Volumes, Level of Service and Operation

It is expected that the schools to receive transfers will have an increase in the number of vehicles picking up or dropping off students resulting in some congestion and queuing of vehicles will occur which is an existing condition at most if not all school sites regardless of enrollment levels. However, because students to be re-assigned in many cases live more than 1 mile away from the new school site, and would need to cross either Bradshaw Road or Routier, and further because school busing will no longer be an option, it is reasonable to assume more parents may choose to drive their children to school. This may result in higher levels of vehicle traffic and congestion for student drop-off.

The City of Rancho Cordova and the County of Sacramento use Level of Service D as an acceptable service for a threshold of significance. For Signalized intersections, Level of Service D is characterized by: "congestion becomes more noticeable. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high volume to capacity (v/c) ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable." For street segments, "LOS D is characterized by congestion with average vehicle speeds decreasing below the motorist's desired level for two and four lane roads. Lane change maneuvers on four lane roads are difficult to make and adversely affect traffic flow like turning traffic and slow vehicles. Multiple cars must wait through more than one green phase at a traffic signal. Stop-controlled approach motorists experience queuing due to a reduction in available gaps."

The proposed project without busing would therefore, increase vehicle trips to the recipient school sites. While it is not anticipated that this amount of new vehicle traffic would exceed level of service D at or near major streets and signalized intersections, it can be expected that localized, short term congestion would occur at the school sites during drop off and pick-up. These may pose increased safety issues for children walking near the school site with heavy vehicle traffic.

# <u>Public Transit, Bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities</u>

The common standard of significance for bicycle and pedestrian facilities in the City of Rancho Cordova General Plan EIR states that "the project is considered to have a significant effect on bike and pedestrian facilities if it would result in adverse effects to existing bikeways or pedestrian facilities that would discourage their use and result in safety issues" or if a project "would conflict with policies, plans, or programs supporting alternative transportation or increase demands for transit facilities greater than planned capacity (e.g., transit service, carpooling, bicycling, walking)." From a CEQA perspective, the proposed project does not adversely physically affect the bikeway or pedestrian facilities in the area, but the project does pose unresolved safety issues for the children (due to their number and age) who will no longer have busing as an option and therefore, may cross Bradshaw and Routier Roads. Based on the proposed re-assignment areas prepared by District staff, there are an estimated 153 students from A.M. Winn that would need to cross Routier Road and an estimated 183 A.M. Winn students who would need to cross Bradshaw Road. Therefore, absent bus alternatives, the proposed project would significantly increase the number of students required to cross major roadways which poses safety issues.

## **CONCLUSION**

While no significant traffic impacts such as substantial change in a major roadway or intersection level of service is expected to result from the proposed action, without busing, it is expected that peak hour localized congestion at the receiving schools will be exacerbated. And, additionally, without busing a substantial number of students would be exposed to safety risks related to crossing major roadways.

Available bus service would address queuing issues at school sites by reducing the number of vehicles at drop-off and pick up hours and would also reduce the risk of students crossing major roadways as pedestrians. Both Routier and Bradshaw Roads do have pedestrian facilities (signals and crosswalks); however, they are both very wide roadways. In the case of Bradshaw, the roadway is 6 lanes carrying very high traffic volumes (40,000 to 60,000 average daily trips or ADT). In the case of Routier Road, the roadway is a 2 lane arterial, which carries lower traffic volumes (less than 7,000 ADT) but which has high speeds due to the length of space between controlled intersections. Crossing guards have been recommended as a mitigation measure to resolve safety concerns. While this mitigation measure may reduce safety risks, such measures would not with certainty resolve these risks particularly on a heavily traveled and wide roadway like Bradshaw. In conclusion, absent busing service, it cannot be said with certainty that the proposed project would not result in continuing and long term safety risks.