

Nicholas Arps, Director of Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608

Submitted via email: construction@sanjuan.edu

RE: Notice of Preparation of an Environmental Impact Report for the Katherine Johnson Middle School, SCH Number 2022060230

Dear Mr. Arps:

We have lived for decades in our home located within 1/3 mile of the Creekside Surplus School Site that was once the Creekside Elementary School. As a result we cherish our neighborhood, its parks and open space, and our creeks (Strong Ranch Slough and Chicken Ranch Slough). We have seen how your district has made a success out of its district-wide K-5 Montessori School while the old Creekside elementary school buildings were, by comparison, allowed to deteriorate. Over the years since the San Juan Unified School District (SJUSD) declared the Creekside site to be a Surplus School Site, the SJUSD has tried to sell the site to developers (there were no takers), has leased the property to private schools, and has re-purposed the buildings and grounds for use as an adult education facility. In the meantime, the public has continued to enjoy the site's open spaces for recreation and access to the outdoors, including the adjacent Creekside Nature Area that is a unit of the Fulton-El Camino Recreation and Park District (FECRPD) facility set.

While we have no problem with SJUSD rehabilitating the old Creekside School or using the property for a valid school district purpose, we are deeply concerned about the SJUSD proposal to create a new middle school campus at Creekside. Therefore, it was good to see that SJUSD intends to prepare an Environmental Impact Report (EIR) for the proposal at Creekside, as there will indeed be significant impacts on the environment if that project is carried out. But before getting into our specific comments about contents of the Notice of Preparation (NOP), we point out some overarching concerns:

- Process – The manner whereby the Creekside site was chosen is highly suspect. SJUSD has told the public that there have been problems stemming from the blending of middle schoolers and high schoolers at the Encina Preparatory High campus. Specific data in support of that problem have been hard to find, however the Assessment Data reports for Encina have consistently shown low academic performance there. What's missing, though, is a distinct policy-making trail from the alleged problem of having middle school grades at Encina to the proposed solution of creating a new middle school campus at Creekside. Apparently, no other locations were evaluated by the SJUSD Trustees and, thus, the Trustees could not have known of the environmental effects of their action to select Creekside as the solution to the Encina problem. This has caught the public unaware and has spurred concern among

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the fairly small segment of the public that has been told about the proposed new campus at Creekside. It would be helpful to have the EIR fill in the details of how the SJUSD Trustees determined – via an open process that involved the public and responded to their concerns - that middle school grades would not be hosted at the 47.41 acres of school district land at the Encina/Greer complex and that no other school district property in the west end of the SJUSD would be used for middle school education other than the existing Arcade Fundamental and Arden Middle campuses, the several existing K-8 campuses in the west end, and a new large campus at the Creekside site. This is particularly important given that the SJUSD Facilities Plan, which SJUSD has said drives the construction of new schools, is silent as to the source and use of some \$60M needed to build the Creekside site and an additional unknown sum needed to relocate the adult education facility from Creekside to Encina.

Another questionable aspect of the process is the way the NOP has been drafted. The text seems to be an Initial Study checklist in paragraph form, identifying this that or the other subject as having little or no consequence. Yet, the site's inherent baggage is obvious, as even a casual reading of the NOP comments posted by the State Clearinghouse show. We expect the SJUSD to do more than just give lip service to the issues raised by people and entities that submit written comments about the NOP and the EIR as well as concerns voiced by the public. Our observations about the proposed project thus far have been that any such concerns are held at arm's length by SJUSD Trustees and staff. We agree with CEQA case law that public input should not be given the brush off. We expect the EIR to take public input seriously.

- Demographics – West Arden Arcade is one of four Environmental Justice Areas (EJAs) in the Environmental Justice Element of the Sacramento County General Plan (adopted 12/2019). As designated, the West Arden Arcade EJA applies to all of unincorporated Arden Arcade west of Watt Avenue. The SJUSD policy decision to re-arrange middle school boundaries at its west end has direct ramifications for students and their families in the West Arden Arcade EJA, which implies that the Environmental Justice Element of the County General Plan is of extreme importance for the Creekside project. To characterize the Creekside campus as a panacea for environmental justice problems would demonstrate blissful ignorance of the intent and direction of the Environmental Justice Element, particularly with respect to factors like the West Arden Arcade EJA's poverty, lack of civic engagement, inadequate and/or unsafe mobility choices, and restricted access to open space and a healthful environment. Such problems will not be resolved until all residents of the community can rise above them. At a minimum, vigilance is called for to ensure the current environmental injustices do not get worse.

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- Definition of “project”. The NOP states that “the project” is the “Katherine Johnson Middle School Project”. Katherine Johnson Middle School (KJMS) is located at 1400 Bell Street. There is nothing in the NOP that speaks to the relocation of students from the current KJMS to some other location. Nor does the NOP explain the expanded enrollment of the proposed KJMS campus at Creekside. The CA Department of Education census of KJMS enrollment in the 2021/2022 school year shows 543 students there, only 229 of which are in 6th grade. Those 6th graders would be in the 8th grade by the earliest time the proposed Creekside campus would be open. Will all of them be transferred from Encina to Creekside? Not according to Frank Camarda, SJUSD Operations Chief, whose public presentations have indicated there would be new enrollment boundaries established for the north, middle and south segments of Arden Arcade’s school population. According to Mr. Camarda’s public statements, the projected enrollment at the Creekside campus would be 671, which might be 550-600 more students than would be expected to transfer from KJMS at Encina (based on a guess of about 1/3 of the 229 students). Suffice it to say that the figures are confusing to the public. Adding to the puzzle, the SJUSD has said the expected “bulge” of middle schoolers in the west end is temporary, can be absorbed by the existing high schools, and contrasts with the expected overall decline in enrollment now underway. It would be helpful for the EIR to provide details about how many students are expected to attend the proposed KJMS at Creekside and identify the neighborhoods from which those students would be derived, address the temporary nature of the expected middle school “bulge” and explain how the need for 3 middle school campuses within 3 miles (one re-boundaried and 1 brand new) are justified in the face of a declining school population.

In addition, since the NOP says the current adult school at Creekside will be relocated to Encina, the EIR should provide sufficient information about impacts from that component of the project as well as describing the Creekside factors. If the 300 adult school students from the current Creekside adult school population of 300-500 (NOP data) are to be transferred to Encina, where will the other 200 students be sent and what are the environmental implications of shifting those students?

- Not fair to kids. Rosy expectations lie at the heart of the argument for the Creekside campus. It has been said that children deserve a nice school they can be proud of, especially disadvantaged children. But any way the site is sugar-coated cannot escape the simple fact that the site is too small for the proposed kind of large middle school. Because of the site’s flood risks, the buildable acreage is considerably smaller than what the state expects. The location at 3 dead-end streets requires a through road. Recent SJUSD construction projects in the local area involve large parking lots that ultimately reduce existing green space. District staff had told the public that the

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campus plan is fixed, the building footprints will not be changed and 2-story buildings will not be considered. The SJUSD Facilities Committee was told the site barely exceeds 70% of the state's cut-off for an undersized middle school campus of this magnitude. SJUSD staff have hinted that the state can grant an exception. It is a mystery why it is OK for disadvantaged students to get a minimum-sized campus or a less-than-minimum sized campus they are supposed to be proud of when students in SJUSD's privileged neighborhoods have more spacious facilities. Further, putting a low-performance student body into a new building is no guarantee of remarkably-improved performance. Lower class size, a much better ratio of teachers to students, and a wide diversity of academic and physical education experiences are probably in order. All those factors speak to a need for more space, not less; for maximums, not minimums.

Having stated those overarching matters, we turn to the NOP's list of potential environmental impacts. As indicated above, we are not opposed to SJUS using the site for school district purposes, but we do object to the scale of development and rush to judgement inherent in the proposed project to date. The California Environmental Quality Act is merely a device whereby decision-makers (in this case, the SJUSD Trustees) can become informed of the environmental consequences of their actions. We expect the EIR to treat each aspect with sincerity, to delve into the concerns raised with an approach that demonstrates a genuine search for answers and mitigation. And we expect the SJUSD Trustees to respond according to their adopted strategy of respecting the entire community they serve in that they "commit to hearing all voices, acknowledging, validating, and responding as we continuously grow together as a community" (SJUSD Strategic Plan Shared Value #3).

Rather than detail points other commenters may have raised or can be expected to raise for each of the various factors laid out in the NOP, we submit some highlights that matter sincerely to us and, we imagine, can add value and clarity to similar concerns raised by others.

AESTHETICS, LIGHT AND GLARE. The Creekside site is smack in the middle of a large, densely-populated, major urban area. The fact that the site has a lot of open space and is adjacent to Chicken Ranch Slough and the Nature Area has tended to buffer the surrounding residences from the, frankly, largely unpleasant urban mass that surrounds the site. Maximum development of the site will only take away from the relief the site currently offers to nearby residents. So, while we understand that schools have to be lit during certain periods of darkness, we assert that backlight, up light and glare (BUG) standards are of paramount importance. Lighting design for the new campus should not only involve BUG-appropriate luminaires, but should also consider circadian lighting aspects (color spectrum), intensity (dimming), security lighting based on motion sensing technology, and dark sky solutions. Those factors can help to diminish the intrusiveness of the campus' lighting on adjacent residences, flora and fauna. This topic area is also related to the energy topic area.

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AGRICULTURAL AND FORESTRY RESOURCES. The NOP states that it will say no forest lands are present. Such a statement reflects a misguided attitude towards forests – as though trees only have value for lumber. Yet for decades the US Forest Service has promoted the policy stance that forest lands have many uses beyond just timber harvesting. What matters at Creekside is urban forestry. There are significant trees at Creekside and its neighboring Nature Area. Those trees provide important reductions in the heat island effect, sequester carbon, and provide habitat for animals, including sensitive species. The current trend in state policy is for more and better trees – not less of them - in urban areas, particularly urban areas that can be of service to residents of disadvantaged areas like West Arden Arcade. The role of trees as a climate change strategy cannot be overlooked; the state even has an oak tree initiative that speaks directly to the ability of oak trees for carbon sequestration.

The site might not be “zoned or designed for agricultural” purposes, but it is used that way. There is a community garden at the current adult school, one that seems to be important to local residents, many of whom are recent immigrants and refugees. And, frankly, that’s consistent with modern trends away from Big Ag and corporate farming. If you want fresh produce, grow it yourself. Children and their families can learn that food is not grown in the back rooms of supermarkets. That’s consistent with SJUSD’s Strategic Plan commitment #2 to “Real World Knowledge”, so why get rid of it?

AIR QUALITY. We all know our local air quality is awful. There will be plenty of days when students will not be going outdoors at Creekside thanks to air quality levels rated hazardous for children’s lungs or athletics conducive to mouth-breathing. There will surely be days, even weeks, when California is on fire and smoke hangs heavy over our community. If the site was bigger, it could have more room for indoor athletic activity – a gym with a mezzanine running track for example. The likelihood of several days with bad air quality argue for a site plan that has not been preselected to be a set of buildings that require going outdoors when traveling between class rooms. Air quality events are less problematic if a two-story building footprint is used, one conducive to moving between class rooms without going outdoors. This topic area is directly related to the energy and air quality topic areas.

BIOLOGICAL RESOURCES. We have seen the extensive letter sent by the CA Department of Fish and Wildlife in response to the NOP. We have also seen the letter from the CA Wildlife Foundation/California Oaks and the comments of the Sacramento Area Creeks Council. It is obvious that the site is very important to local flora and fauna, including several species of concern. To those letters we note our own direct observations of species of concern such as the Western Pond Turtle, Red-shouldered hawk, Yellow-billed magpie, and our knowledge of the observations of others as to long-eared owls, Swainson’s hawks, Cooper’s hawks, White-tailed kites, Great egrets, and the like. The NOP states that Chicken Ranch Slough “runs through a small portion of the project site’s northern boundary.” That’s not true. Chicken Ranch Slough runs along the site’s entire northern and northwestern boundary and provides important riparian habitat immediately downstream of the Slough’s reach that runs through the Creekside

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Nature Area that holds a crucial Blue Oak legacy forest. The riparian habitat of Chicken Ranch Slough in the immediate vicinity of the site is important habitat, not something to be taken lightly.

Sacramento County strongly values our riparian habitat areas. The County's web site says:

“When compared to grasslands and upland forest, riparian areas have the highest species diversity and productivity for both flora and fauna. Over 135 species of California birds such as the willow flycatcher, yellow-billed cuckoo and red-shouldered hawk either completely depend upon riparian habitats or use them preferentially at some stage of their life. Riparian habitat provides food, nesting habitat, cover, and migration corridors. Another 90 species of mammals, reptiles, invertebrates and amphibians such as California red-legged frog, valley elderberry longhorn beetle, riparian brush rabbit, steelhead, Chinook salmon, western pond turtle, Sacramento splittail, giant garter snake, and Swainson's hawk depend on California's riparian habitats. Riparian habitat provides riverbank protection, erosion control and improved water quality. In addition, riparian areas provide numerous recreational and aesthetic values.”

It goes on to say, “Only 5% to 10% of California's original (pre-European contact) riparian habitat exists today and much of the remaining habitat is in a degraded condition.” And adds:

“Sacramento County has adopted numerous policies in favor of protecting riparian areas. These policies can be found in the 1993 Sacramento County General Plan Conservation Element. County policy CO-62 ensures no net loss of marsh and riparian woodland acreage, values or functions. County policy CO-67 states that parcels shall not be created wherein much of the parcel area would comprise marsh or riparian habitat rendering the parcel unbuildable except when within a floodplain corridor or to be dedicated to and maintained by the County for flood control, drainage, and wetland maintenance.”

(source: https://planning.saccounty.net/InterestedCitizens/Pages/ER_Riparian.aspx)

It is abundantly clear that the EIR needs to pay very careful attention to the biological resources and sensitive habitats associated with the site, Chicken Ranch Slough, the unbuildable area of the site subject to flooding, and the adjacent Creekside Nature Area.

CULTURAL AND TRIBAL RESOURCES. We support the concerns and issues presented in response to the NOP by the Native American Heritage Commission.

ENERGY – The NOP is phrased so as to suggest that the EIR will mention energy conservation and move on. There doesn't seem to be any sense of emergency. But the issue is not trivial. In fact, SMUD is currently implementing a policy whereby the region's power supply will be carbon-free by 2030. To achieve that, SMUD relies on partnerships with other public entities.

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That means SJUSD will need to step up with leading edge innovations, rather than being among the last to participate as implied by the NOP. Full-on energy efficiency investments in lighting, HVAC systems and building envelope technology are called for, along with aggressive investments in solar power, battery storage and a complete commitment to electric vehicle support (for SJUSD vehicles and chargers and battery storage for staff, parents, and visitors whether they use electric cars or e-bikes and for students who might use e-bikes and e-scooters) in addition to total support for access by non-motorized vehicles. This topic area is directly related to the air quality and transportation topic areas.

GEOLOGY, SOILS, MINERALS AND PALEONTOLOGY – Our primary concern here is that the soil in the parts of the site subject to flooding should not be disturbed.

GREENHOUSE GAS EMISSIONS – The topic area should be re-focused on all aspects of climate change. It is obviously linked with several other topic areas. Climate change is real and the sense of enormous adverse impacts is growing every day. We can expect intense atmospheric river events, serious challenges to our water supply, longer periods of hotter temperatures, greater and more disastrous wildfires and severe disruptions to our normal expectations for vegetation and other biological resources. The EIR should treat climate change like the serious threat it is.

HAZARDS AND HAZARDOUS MATERIALS – The NOP describes this topic area as just another required topic that can be dismissed with a few canned paragraphs. For example, is the site close to an airport? That's not as big a factor as it was when McClellan AFB was in operation. These days the site is underneath the take off and landing pattern of McClellan Field, which involves occasional flights related to aircraft rework and significant flights connected with Coast Guard and CalFire missions. Especially during fire season, the aircraft flights are particularly disruptive. This topic area is related to the noise and vibration topic area.

HYDROLOGY AND WATER QUALITY – This topic area is presented by the NOP as one that has potential significance. And, indeed, this topic is one of several serious challenges to the project due to the presence of Chicken Ranch Slough. The Chicken Ranch Slough watershed and creek system is addressed by several policies of Sacramento County and is part of the larger State Plan of Flood Control system that is linked with the Central Valley Flood Protection Board and federal flood damage reduction programs administered by the Army Corps of Engineers and other federal entities. The EIR should therefore show how the project will adhere to and address federal, state and county objectives. Long story short, there should be no construction within the flood-risk area associated with the worst-case climate-change scenario. This includes the perimeter fencing the project anticipates for the lowest portion of the flood risk zone (around the elevation vicinity of a 3-5 year recurrence interval flood), as such fencing will act as a debris barrier that can impede the flow of water and direct flood waters into more hazardous circumstances. We are aware of, and support the recommendations of, the Sacramento Area Creeks Council in this regard.

NOISE AND VIBRATION – Interference with routine ambient noise should not be evaluated on the basis of decibels that interfere with hearing health. Instead, the EIR should listen carefully to

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the kinds of concerns raised by nearby residents in the two public meetings that preceded the NOP comment deadline. The normal screaming, shrieking, yelling, etc. of middle school children's outdoor activities can seriously disturb nearby residents' peaceful enjoyment of their homes. Our house is .3 crow-fly miles from a school that is adjacent to a public park and swimming pool. We routinely hear disruptive noises from school groups and public address systems. Thankfully this does not impact us every day, as could very well be the case for residences close to a large middle school. The problem of disruptive school-generated noise should not be treated lightly in the EIR. Nor should the EIR overlook the noise and vibration impacts from low-flying aircraft that will inevitably pass over the site, particularly during California's long fire season.

POPULATION AND HOUSING – The NOP seems oblivious to the existing situation of crowded multi-family residences that exist adjacent to and nearby the Creekside site. The residential load has exploded in recent years as local rents have skyrocketed and with the addition of immigrants and refugees who often have large families. Though the proposed project is unlikely to reduce the demand for housing, it will inevitably conflict with the on-street parking situation that has emerged in the vicinity along with the increased intensity of home occupancy.

Population shifts within the SJUSD have led SJUSD to make changes to its property holdings in the west end by changing schools, leasing property or using west end schools for district-wide purposes. In recent years, the student population has shifted away from the east end and back to the west end. Since the SJUSD is now converting its district-wide Arcade fundamental middle school to a neighborhood-oriented, bounded middle school, the EIR should present analyses of possible changes to other west-end properties held by SJUSD. The EIR should consider whether other district-wide or special-purpose schools - such as Thomas Edison Language Institute or General Davie school - could be relocated to under-utilized sites away from the west end to make room for the middle school "bulge" in the west end. The EIR should present data about SJUSD's leased property and the potential to reclaim the properties by terminating or not renewing the leases so as to create alternatives to an expensive new school at Creekside. The EIR should also seek alternative ways to use the Creekside site for school functions that do not involve the significant impacts that the proposed large new middle school poses at Creekside. And because taxpayers and school budgets should not be saddled with long-term brick-and-mortar solutions to temporary student population "bulges", the EIR should address the overall decline in student population that works against the presumption of viability for new campuses.

PUBLIC SERVICES – The NOP seems to have included this topic area as just another excuse to dismiss challenges to the proposed project at Creekside. Because the site is in unincorporated Sacramento County, local public services are largely inadequate. For example, the CHP is supposed to provide traffic enforcement – such as reckless driving or speeding – but is spread so thinly across California that it cannot match the traffic enforcement capability of local cities. That means our local streets and roads are not very safe. By significantly altering traffic patterns, the new school will worsen the existing situation. Likewise, municipal services delivered by the county are already stretched too far – our county Supervisor has said in public meetings that the county isn't up to the job. Creating a large new middle school at Creekside will likely burden the county with additional workloads for road maintenance, parking enforcement, code compliance,

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homeless encampment surveillance and so on. Since unincorporated communities cannot respond to the demand for services the way cities do, the NOP's focus in this topic area needs to be on the existing and expected inadequacies and costs of services, rather than the creation of new facilities. This topic area is obviously related to several other topic areas.

RECREATION – The NOP proposes to speak about the new campus at Creekside as a driver of increased recreational demand. In reality, though, the real problem with the site is that it threatens to reduce the availability and existing use of the site for recreation. As mentioned above, many residents of the surrounding area are economically disadvantaged. The site is their only open space available for outdoor recreation. The Environmental Justice Element of the County plan clearly shows that there are no traditional parks available within ¼ mile of the residents of the immediate vicinity. The Creekside Nature Area is a specialized recreational facility that gives residents certain opportunities to experience the outdoors, and those functions are most definitely valued by the users. However, for decades the school property has routinely been used for more traditional kinds of urban recreation: playing catch, throwing frisbees, kicking soccer balls, jogging, walking dogs, riding bikes, etc. By locking the public out from the open space at the site, SJUSD will most definitely restrict the largely disadvantaged population of users from access to the site and, unless public access to the Nature Area is guaranteed, the project will deny users of their outdoor recreation experiences there as well. SJUSD has historically enabled the public to use its facilities for outdoor recreation when school is not in session. But more recently, SJUSD's facilities have been locked up to keep the public away at all times, even though the school facilities are not used in the late afternoons and evenings, on weekends and holidays and during long summer recesses. The EIR should address this problem and propose mitigation that will enable the public to continue to enjoy the unfettered access to outdoor recreation that has always been provided by the site.

TRANSPORTATION – This topic area is of extraordinary significance for the project. The EIR should specifically address how the local streets are currently used and how their use will be changed if the large new middle school campus is built at Creekside. Traffic counts alone will not tell the story. Neighborhood streets like Sweet, Elvyra and Belport on the west are already narrow due to street width and parked cars, to the point where only one vehicle at a time can pass through. Parked cars have been clipped by large trucks. Speeding vehicles have threatened pedestrians and even killed neighborhood pets. On the east side, Jonalan, Hampshire and Miramar are residential streets with many driveways. They are not well-suited for the inevitable crush of drop-off or pick-up and event traffic and parking that the school will cause. Further, it is simplistic to think that vehicles leaving the school will be able to easily execute turns from Belport to El Camino or from Elvyra to Fulton. Similarly, traffic on the east side will inevitably experience conflicts with turns from Morse to either Marconi or El Camino.

As for alternative means of mobility, the EIR should understand that there is no viable bus service for the school site. Sacramento RT runs buses with half hour headways on El Camino, Marconi and Fulton that are mostly focused on commuter connections to the light rail system serving downtown Sacramento. Arden Arcade is famous for speeding traffic and lack of sidewalks. The streets in the proposed campus's service area have a few bike routes on major roads and there are no protected bike lanes. The few streets with sidewalks in the proposed

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campus's service have 1950's era narrow sidewalks with rolled curbs and many obstructions like telephone poles and utility boxes. Walking and biking are, frankly, unsafe and unpleasant activities for any of the major access roads. Street crossings are another serious problem. The SJUSD has told the public that students will be expected to walk to and from the proposed project if they live within 1 ½ miles of the school. That means students will be expected to cross major streets like Howe, Bell, Fulton, Watt and El Camino. Safe crossings (stop signs, street lights, etc.) on those thoroughfares are spaced far apart. It is generally too far to walk to and from a safe crossing, meaning students will understandably attempt crossings where there are no stop signs, street lights or protective mid-street islands. We shudder to think of middle schoolers crossing a street like El Camino twice a day during rush hour, a problem that will inevitably be made worse by crossings in darkness (during winter and as a result of daylight-savings vs. standard times).

UTILITIES AND SERVICE SYSTEMS – The NOP talks about the availability of services but doesn't seem to mention the conflicts that provision of those services can cause. For this topic area, the EIR should detail how street congestion is complicated on trash pick-up days and how emergency service vehicles, maintenance vehicles, delivery vehicles and utility vehicles often block traffic on roads needs for access to and egress from the site. Understanding that storm water drainage will be discussed in the hydrology/water quality topic area, we suggest that water supply is not just an issue for this topic area, as it is substantially related to climate change.

WILDLAND FIRE HAZARDS – The NOP's assertion that there will be no wildfire impacts is beyond belief. Just last week there was a wildfire on the school property at the northwestern reach of Chicken Ranch Slough. By sheer good fortune, a neighbor was awake during the early morning hours when the fire broke out and called Metro Fire. Their fire fighters were able to get the blaze under control before too much damage could be done. However, even the slightest differences in observation, temperature, wind and humidity could have set off a major fire. The reality is that California is a tinderbox and urban wildfires are a thing. Had the fire spread it could have destroyed the riparian vegetation in the now-dry creek bed, the bridges, the Nature Area and its priceless oak forest, adjacent residences and utility lines. This topic was the subject of considerable concern at the SJUSD Scoping Meeting on June 30th. Please see to it that the EIR treats the threat of urban wildfire as the serious issue that it is and as an issue that is exacerbated by climate change.

Thank you for your attention to these comments. As you can tell, we are deeply concerned about a number of issues that rise to the level of significance and cry out for mitigation. We have been appalled by the insistence of SJUSD that the die has been cast such that nothing the public says will make a difference. We expect the EIR to comply fully with CEQA rules and regulations, to not be used as a justification document, and to apply genuine, serious mitigation to the current, hastily-developed design. We also expect the "no project" alternative to be given sincere consideration, as it is our preferred alternative.

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