

Via Email

December 20, 2021

Courtney Brown  
City of Oakland, PBD Development Planning Division  
250 Frank Ogawa Plaza, Suite 2114  
Oakland, CA 94612  
Attn. Head Royce School Planned Unit Development Project DEIR Comments  
cbrown@oaklandca.gov

RE: Head-Royce School Planned Unit Development Project DEIR Comments:  
Traffic Impacts

Dear Ms. Brown,

### **INTRODUCTION**

The Neighborhood Steering Committee (NSC) is a grassroots group of neighbors who volunteer their time, skills, and desire to help resolve issues resulting from the operations and activities of Head-Royce School. We engage with the City of Oakland and Head-Royce to advocate for the neighbors' points of view.

With this letter, we object to the increased traffic that would result from Head-Royce School's desired expansion described in its Draft Environmental Impact Report ("DEIR"). **The DEIR's conclusion that the expansion would cause "less than significant" traffic impacts is not credible and is the opposite of its own consultant's (Fehr & Peers) prior conclusions.**

Neighborhood roads can't accommodate a 37% increase—an additional 387 students and faculty---to the school's current population.<sup>1</sup> One need only spend a single day observing Lincoln Avenue<sup>2</sup> during Head-Royce's student pickup or drop-off times to observe the chaos that is the current traffic situation. The additional traffic generated by an enrollment boom would be inconsistent with the residential zoning and character of this neighborhood and exacerbate already overburdened road conditions.

The DEIR reaches its erroneous conclusion based on the following:

---

<sup>1</sup> See EIR, p. 14-24, Table 14-4. The project wishes to add 356 students and 31 faculty to its existing 2018 student-faculty population of 1,052 for a total of 1,439.

<sup>2</sup> Lincoln Avenue is a relatively narrow, two-lane road. It is the main artery for this neighborhood and the school, with access to HWY 13 to the East and HWY 580 to the West. Head-Royce's plans do not include any road capacity improvements to Lincoln Avenue.

- a. First, the DEIR relies heavily on stilted calculations for **vehicle miles traveled (VMT)** to show there is virtually no change in traffic with its planned increase, and therefore no significant traffic impact. However, the DEIR's VMT numbers lack sufficient support, omit necessary data, and employ nonstandard methods, resulting in conclusions that ultimately oppose its own consultant's finding of significant impact and our own observations of traffic conditions.
- b. Second, Head-Royce contends constructing a new **internal loop road** on its South Campus will avoid the need to use Lincoln Avenue to queue its cars, use neighborhood streets to make turnarounds, and relieve any theoretical congestion. The DEIR makes this conclusion without any study of the function, management or efficacy of the internal loop, including capacity, turn rates, flow, or noise and pollution to nearby homes.
- c. Third, Head-Royce contends that a new Traffic Demand Management ("TDM") plan would assure **compliance** with best driving practices and prevent disruptions to the neighborhood. This is not credible because Head-Royce has not been able to meet its *existing* TDM compliance obligations with a *lesser* number of cars, which can only worsen if it is permitted to increase its population. Notably, this new TDM has not been included in the DEIR.

Many of the DEIR's conclusions about traffic are flawed, misleading, or unintelligible. Our comments focus on three areas in the DEIR: (a) VMT, (b) the internal loop road, and (c) compliance.

#### **A. VEHICLE MILES TRAVELED (VMT)**

The DEIR's "less than significant impact" traffic finding hinges on its VMT calculations, which were altered to reverse its traffic consultant's [opposite] finding of "significant impact." The VMT calculations also contained numerous other flaws, that are readily apparent even from a lay person's perspective.

1. **The DEIR uses an incorrect basis for its "Existing VMT."** As we understand it, VMT refers to the amount and distance of automobile travel attributable to a project and is recommended as an appropriate measure for automobile delay. (DEIR, 14-7; SB 743) *Existing VMT* is a measure of existing regional traffic. In contrast, we understand that *Project VMT* reflects new traffic resulting from the project. The DEIR does not evaluate total VMT impacts, rather it compares Project VMT *per population* against a Threshold of Significance to determine whether the project will create substantial traffic impacts. Therefore, total VMT is converted in the DEIR to a per population basis. Generally speaking, a Threshold of Significance is standardized as 15% below the Existing VMT.<sup>3</sup> If the Project VMT is above the Threshold, traffic impacts are considered significant. In other words, this scheme

---

<sup>3</sup> See e.g., DEIR, Attachment 14, p. 10.

essentially rewards projects that spur new transportation modalities that are more efficient than existing modalities. The overall goal of SB 743 is to reduce VMT per vehicle.

The first flaw here is that the DEIR *does not use regional traffic conditions* for Existing VMT. Instead, it compares Head-Royce's *own* Existing VMT to its own anticipated new traffic, or Project VMT. The only rationale given for deviating from accepted methodology is the conclusory statement that Head-Royce School has a "unique use and characteristics" – little other context or explanation is given.<sup>4</sup> We find there is little point to comparing school : school data on a per vehicle basis since the number will be (as it is in this case) essentially the same. Case in point: the DEIR Existing VMT per population of 26.9 and the Project VMT per population of 27.3 is nearly the same.<sup>5</sup> The small difference (an actual *increase* in VMT!) of +0.4 results from a disproportionate increase in student to faculty. (Faculty have a lower VMT because they park at the school e.g., 2 trips per day, instead of 4 associated with a pickup/drop-off vehicles)<sup>6</sup>

In other words, the Existing VMT calculation is defective because it compares "Head-Royce : Head-Royce" rather than "Regional Conditions : Head-Royce." The DEIR's use of VMT in this way is misleading. It should be clarified and subject to a study of regional conditions and further validation.

- 2. The DEIR's VMT numbers lack sufficient support.** The second major flaw is the lack of backup for the DEIR's VMT calculations. The DEIR relies on "estimates" or various reports and backup data (e.g., Head-Royce's car counts) that have not been provided with the DEIR or its Appendix 14. The omission of data severely undermines the public's ability to meaningfully review and comment on the DEIR's conclusions.

From what we *are* able to discern, the DEIR seems to largely rely on outdated data (e.g., from 2018-19 or before) which don't reflect "current" traffic conditions or driving habits.<sup>7</sup> For examples, neighbors witnessed a significant increase in single-occupant vehicles ("SOVs"), and corresponding decreases in carpools and students riding buses during the pandemic, presumably for social distancing. This apparent trend would significantly increase VMT estimates above that reported in the DEIR.

---

<sup>4</sup> DEIR 14-8; see also DEIR, Attachment 14, p. 10 ("Due to its unique use and characteristics, the Alameda CTC Model cannot be used to estimate VMT for the Head-Royce School")

<sup>5</sup> DEIR 14-26; DEIR, Appendix 14, p. 12.

<sup>6</sup> DEIR, Appendix 14, p. 12 ("The VMT per population for the School Expansion Project is slightly higher than the existing because the School Expansion Project includes a higher proportion of students than faculty and staff and students have higher VMT because the student drop off/pick-up trips are [sic] assumed to have twice the VMT as on-site parking trips as described above.")

<sup>7</sup> DEIR 14-7, Table 14-1.

In still other areas, the DEIR favored using “estimates” where actual data should be available. (See e.g., 14-6 to 14-7 on existing mode shares). We provide two examples:

- i. Zip Code Data. It’s unclear how the DEIR uses ZIP code data to make VMT assumptions.<sup>8</sup> It appears the DEIR assigns a travel mode based on the distance a student or staff lives from the school. The DEIR states:

Travel mode allocations were based on the availability of travel modes for each ZIP code. For example, all the walk and bike trips were allocated to the ZIP codes within five miles of the Head-Royce School. The bus trips were allocated based on the overlap between the private and public bus service areas and the home ZIP code locations, with most bus trips allocated to ZIP codes within 10 miles of the Head-Royce School.<sup>9</sup>

This Zip Code method may result in unrealistic allocations of mode shares. For example, we’ve witnessed virtually no one biking or walking to Head-Royce. Head-Royce is located on a steep grade, and many neighborhoods within 5 miles don’t even have sidewalks. Assumptions should not be substituted for actual, verified data. Since mode shares and allocations are of its own population, Head-Royce should be able to readily obtain this data.

- ii. Bus Ridership Estimates. In a second example elaborating on bus ridership, it is unclear how the DEIR estimated that 42% of its population use private and public buses.<sup>10</sup> This appears especially inflated for the AC Transit portion. The DEIR suggests very limited riders on AC Transit:

Although the dedicated school routes have stops on Lincoln Avenue adjacent to the Head-Royce School, they typically do not serve the Head-Royce School population. These lines primarily provide bus service for the students who live in the area and attend nearby public schools. Although these AC Transit bus lines do provide for transit serves [sic] at high frequencies during school-related peak hours, which coincide with typical AM peak hours, they do not provide frequent bus service during the typical PM peak hours.<sup>11</sup>

Head-Royce’s Conditional Use Permit (CUP) requires that it provide vouchers to student and faculty bus riders. Therefore, actual ridership data

---

<sup>8</sup> DEIR 14-6 to 14-8.

<sup>9</sup> DEIR 14-8

<sup>10</sup> DEIR 14-7.

<sup>11</sup> DEIR 14-2.

should be available and used to validate its ridership assumptions. Changes in ridership over time should also be scrutinized as multiple lines of evidence yield better data.

There is virtually no discussion in the DEIR on how its estimates are validated or any other process that assures the quality and accuracy of the data. In short, the DEIR's data on transportation requires further study and disclosure of its sources.

- 3. Head-Royce selectively inflates VMT Threshold to reverse its consultant's conclusion.** The most egregious misstep occurs where the DEIR reverses Fehr & Peers' traffic conclusion from "significant impact" to "less than significant impact" by manipulating the VMT Threshold after the fact (using no new actual data but by making SOV assumptions).<sup>12</sup> The DEIR appears to do so in the following steps.

First, the DEIR changes Fehr & Peers' Threshold of Significance:

**Table 1-Comparison of Threshold of Significance**

<b>Fehr &amp; Peers (2020)</b> (DEIR, Appendix 14, p. 10):	<b>DEIR</b> (DEIR 14-22):
"The <u>School Expansion Project</u> would cause substantial additional VMT if it exceeds the existing <u>VMT per Total School Population</u> minus 15 percent."	"The Project would cause substantial additional VMT if it exceeds the existing VMT per school population, assuming a 30 percent non-single occupant vehicle mode share (i.e., the current TDM Plan requirement), minus 15 percent."

Under the Fehr & Peer analysis, the Existing VMT is 26.9 and Threshold is **22.9** (i.e., a 15% reduction of 26.9 is 22.9).<sup>13</sup>

Under the DEIR, the Threshold balloons to a whopping **33.6**, paradoxically permitting each person associated with the school to travel an *additional* 10.7 miles. The DEIR inflates the Threshold of Significance by incorporating a 30% "allowance", backpedaling on its prior calculations. The DEIR accomplishes this mathematically by first increasing the Existing VMT of 26.9 by 35% (based on its claim that it has reduced SOV 35% more than the 30% required by its TDM, or 65% total) for an "adjusted" Existing VMT of 39.5. From there, it gets a Threshold of Significance of 33.6 (a 15% of 39.5 is 33.6)<sup>14</sup> The difference in results?

<sup>12</sup> Fehr & Peers' Transportation Assessment (Appendix 14) is slyly characterized by the DEIR as "amended as Chapter 14 of this EIR" to justify the changes.

<sup>13</sup> DEIR, Appendix 14, p. 10.

<sup>14</sup> DEIR 14-23, Table 14-3.

**Table 2—Comparison of Traffic Impact Conclusions**

<b>Fehr &amp; Peers (2020)</b> (DEIR, Appendix 14, p. 10):	<b>DEIR (2021)</b> (DEIR 14-26):
<p>“As described earlier, the threshold of significance for the project is recommended to be 15 percent below the existing VMT per population. Since the existing VMT per population is 26.9, <b>the recommended threshold is 22.9.</b> The VMT generated by the School Expansion Project is 27.3. Thus, the VMT generated by the <b>School Expansion Project is considered a significant impact.</b>”</p>	<p><b>“The threshold of significance for the Project is 15 percent below the VMT per total school population, assuming a 30 percent non-SOV mode share (consistent with the current TDM Plan requirement), or 33.6 VMT/population.</b> The calculated VMT generated by the Project is approximately <b>27.3 VMT/population.</b> Since the VMT generated by the Project is below the significance threshold, <b>the Project would have a less than significant impact on VMT.</b>”</p>

This reversal of fortune is not credible on any level. Even were it acceptable to “credit” Head-Royce with 35% inflation to its Existing VMT of 26.9 (we don’t think it is), then the same 35% inflation must *also* be applied to the Project VMT 27.3. (Recall, Project VMT is essentially a parallel, proportional increase of its Existing VMT, with only a small difference – an 0.4 *increase* VMT per population due to more students to faculty)<sup>15</sup> If the DEIR did this, a 35% increase to 27.3 would result in a Project VMT of 36.9, which is *above* the inflated 33.6 Threshold, and therefore a significant impact.

HRS seems to confusingly claim that limiting parking somehow limits Project VMT increases:

Given that there are no additional parking spaces, all of the increase in SOV mode from the proposed School expansion would rely on drop-off/pick-up vehicles.<sup>16</sup>

[...]

Although the School population is expected to increase by 37 percent, the proposed on-site parking supply would only increase by 22 percent, which would provide fewer parking spaces per population and reduce the automobile trips generated by the Project.<sup>17</sup>

It appears to argue that limiting parking supply also eliminates more SOVs. But this Reagan-like supply side economics argument makes no sense (it didn’t in the 1980’s either). First, it fails to account that SOV includes--and is in fact dominated by—a parent driving with a student and is therefore unrelated to parking supply.

<sup>15</sup> DEIR, Appendix 14, p. 12.

<sup>16</sup> DEIR 14-23.

<sup>17</sup> DEIR 14-27.

Parents drive home, they don't park. Second, it is inconsistent with the Fehr & Peers earlier analysis that parking results in *less* trips per commuter vehicle (2 for vehicles that park, versus 4 for parents that must return home after drop-offs and pickups).<sup>18</sup>

- 4. Further Study & Data Gaps.** It's important to emphasize the limitations of the VMT per population analysis. The DEIR's exclusive reliance on a per population VMT approach ignores the increase in absolute numbers (a 10,500 increase over existing conditions) and the increase in trips in absolute numbers (a 600 increase over existing conditions). This dramatic increase does not support a "no significant impact" finding. In other spots, the DEIR correctly acknowledges the importance of reducing absolute VMT increases:

Increased VMT leads to several direct and indirect impacts to the environment and human health. Among other effects, increasing VMT on the roadway network leads to increased emissions of air pollutants, including GHGs, as well as increased consumption of energy. Transportation is associated with more GHG emissions than any other sector in California. As documented in the City of Oakland Equitable Climate Action Plan (July 2020), 67 percent of Oakland's local GHG emissions are produced by transportation.<sup>19</sup>

Traffic impacts should be further studied with multiple methodologies. In fact, Fehr & Peers Transportation Assessment promised follow up studies, such as:

...we will determine the adequacy of the roadway modifications proposed by the project and whether the proposed plans to alleviate the existing traffic congestion on Lincoln Avenue caused by cars and buses dropping off and picking-up students will be effective, or if these plans coupled with increased enrollment and additional turn lanes and signals on Lincoln Avenue, will result in additional traffic congestion or queuing along Lincoln Avenue.<sup>20</sup>

In addition, Fehr & Peers' work was also to include intersection forecasts, intersection operations analysis, site evaluation, collision history, consistency of plans, peer review of the TDM plan, and documentation and meetings.<sup>21</sup> We would support these additional studies, and ask that they, and the following missing traffic documents referenced in the DEIR be provided for further review:

- i. Transportation Demand Management (TDM) Plan for the proposed project as required by the City of Oakland's Transportation Impact Review (TIRG, April 2017).

---

<sup>18</sup> DEIR, Appendix 14, p. 12; see *infra*, FN 6.

<sup>19</sup> DEIR 14-8.

<sup>20</sup> DEIR, Appendix 14, p.13.

<sup>21</sup> DEIR, Appendix 14, p. 13-16 (entitled "Next Steps").

- ii. The data identified in FNs 1 through 5 of Table 14-2 of the DEIR (DEIR 14-7) and Table 2 of the Fehr & Peers 2020 Transportation Assessment (DEIR, Attachment 14, p. 5):
  - 1. [Re: Drop off/Pickup (Carpool), Drop off/Pickup (SOV), Bike and Walk mode share data] Based on the Head-Royce School traffic **monitor observations in November 2018** and confirmed by **count data collected in November 2019**
  - 2. [Re: On-Site Parking (Carpool) mode share data] Based on the number of students and faculty/staff **carpool parking permits** provided by Head-Royce School
  - 3. [Re: On-Site Parking (SOV) data mode share data] Based on data provided by Head-Royce School and the **available parking supply**
  - 4. [Re: Private Bus mode share data] Based on **data provided by Head-Royce School in November 2018**
  - 5. [Re: Public Bus mode share data] Based on the **Head-Royce School traffic monitor observations** and confirmed by **AC Transit stop-level ridership data.**

(bold added)
- iii. Data regarding travel mode allocations by Zip Code (referenced on DEIR, p. 14-8, and Table 14-2 on p. 14-9)
- iv. Study identified by Fehr & Peers, April 30, 2020 (DEIR, Appendix 14, p. 9) re: evaluation of 7 intersections for turning movement, pedestrian and bicycle volumes on Nov. 14, 2019.
- v. Fehr & Peers, "November 2020" document (see DEIR 14-23, Table 14-2)
- vi. Fehr & Peers, "2019" document (see DEIR 13-29)
- vii. Fehr & Peers, "from AC Transit, 2021" document (see DEIR 14-3, Figure 14-1)
- viii. Head Royce School November 2018 document (see DEIR 14-24, Table 14-4)
- ix. Intersection Forecasts study/data (see DEIR, Appendix 14, p. 13)
- x. Intersections Operations Analysis study/data, including without limitation all Synchro and VISSIM models (see DEIR, Appendix 14, p. 13)
- xi. Site Evaluation study/data (see DEIR, Appendix 14, p. 14)
- xii. Collision History study/data (see DEIR, Appendix 14, p. 14)
- xiii. Fehr & Peers review of City of Oakland adopted Plans and Policy pertaining to transportation (see DEIR, Appendix 14, p. 15)
- xiv. Fehr & Peers Peer Review of Head-Royce Schools TDM (see DEIR, Appendix 14, p. 15)
- xv. Fehr & Peers memorandum summarizing non-CEQA Tasks (see DEIR, Appendix 14, p. 15)
- xvi. All VMT calculation data and formulas used in the DEIR and Fehr & Peers Transportation Assessment (Appendix 14)
- xvii. All studies, documents or data that support Fehr & Peers conclusions that the project has "unique use and characteristics" that warrant not using the Alameda CTC Model and/or the City of Oakland's screening process for



establishing Thresholds of Significance. (See DEIR 14-23 ; DEIR, Appendix 14, p. 9-10)

## **B. THE PROPOSED LOOP ROAD**

The EIR states that the construction of a new Loop Road on the South Campus eliminates the need to: (1) pick up and drop off on Lincoln Ave. and (2) use residential streets (Alida-Laguna-Potomac “loop”) to loop back up to the hills where most Head-Royce families live.<sup>22</sup> It makes these claims even though this concept has not been studied at all. There is no analysis of queue length, discharge rate, turn rate, or impacts to Lincoln Ave or adjacent and neighboring streets and homes. For example, the loop is too short to accommodate existing drivers even before an enrollment increase:

- i. Lincoln Avenue provides 1,679 feet of curb space, counting both north and south sides.<sup>23</sup>



**\*Lincoln Avenue during Head-Royce morning drop-off (September 7, 2021)**

- ii. In contrast, the proposed South side loop is described alternatively by the DEIR as 1,000 lineal feet (DEIR 13-40) or 1,450 lineal feet (DEIR 3-31). Even using the larger figure, this is 279 lineal feet short of what Head-Royce is using now.
- iii. The new loop would not eliminate traffic from Lincoln Avenue, especially if it adds 387 more students and faculty.
- iv. The DEIR alternatively states that there are 385 student drop-offs and 385 pick-ups anticipated each day (DEIR 13-40) or 1,184 at the upper school drop off and 1066 at the lower school per day (DEIR 5-22). These are significantly

---

<sup>22</sup> EIR, p. 14-26 (“The construction of the Loop Road within the proposed South Campus would eliminate all personal vehicle drop-offs and pick-ups along Lincoln Avenue.”)

<sup>23</sup> Residents measured the *existing* queue of Head-Royce cars that stretch from the Gatehouse to HWY13.

- different and must be clarified, along with an explanation of how these numbers were arrived at.
- v. The cars parked in the South Campus (154 new, existing parking spaces) will also add to the cars to the loop road because it's the only way to get in or out of the South Campus. It does not appear that these were added to the number of cars that did not previously have to use the queue, but now will need to queue in the Loop Road to get in and out of the South Campus parking lot.

We observed that Head-Royce drivers have consistently favored speed and convenience over compliance with driving rules. Current noncompliance is a strong indicator that they will not use a backed up internal loop road if there is a more convenient, expedient alternative. The next section of this letter further discusses Head-Royce's inability to secure compliance from its parent drivers.

### **C. EXISTING TRAFFIC NONCOMPLIANCE**

Head-Royce has been unable to effectively manage existing traffic. A 37% increase results in a cumulative impact to severely congested and dangerous traffic conditions. Head-Royce's compliance with its existing CUP hasn't been adequately enforced which is contributing to the bad traffic conditions we experience today. The DEIR now proposes to *remove* certain compliance requirements.<sup>24</sup> We object. Changes to more relaxed standards combined with a larger population of students all but ensures worsening conditions. The following are some of our some of our observations of noncompliance (which are not exhaustive):

#### **1. Documentation Regarding Non-Compliance**

A collection of documents attached as Exhibit 1.i-vii. These exhibits, summarized here, show Head-Royce's historic inability to reliably or consistently achieve compliance with traffic requirements with its current enrollment numbers:

Exhibit 1.i: Emails from residents to Head-Royce voicing concerns over traffic violations.

Exhibit 1.ii: Excerpts from Neighborhood Liaison Committee (NLC) meeting notes posted on the Head-Royce website that involve ongoing complaints about traffic. Continued requests for an evacuation plan have been omitted by Head-Royce.

Exhibit 1.iii: Excerpts from DKS traffic monitoring reports indicating lapses in compliance identified by monitors hired by Head-Royce.

Exhibit 1.iv: Photos of Head-Royce traffic violations.

---

<sup>24</sup> See e.g., DEIR 12-24 where the DEIR proposes to eliminate all Head-Royce traffic "Compliance Reporting" currently required by the CUP (referred to as a "PUD" therein).

Exhibit 1.v: Examples of historical letters from residents responding to Head-Royce's request to increase enrollment in 2015, and which express long-standing dissatisfaction with Head-Royce handling of traffic and opposition to enrollment increase.

Exhibit 1.vi: Bus schedules from AC Transit website.

Exhibit 1.vii: Traffic monitoring spreadsheets recording traffic-related violations and observations by neighbors.

Information identifying residents or Head-Royce drivers has been redacted from these exhibits due to privacy concerns.

## 2. Slow Streets

At the beginning of the Covid-19 pandemic, residents petitioned the City of Oakland to designate certain neighborhood streets as Slow Streets. Oakland public schools were closed to in-person learning at the time, so the space was very much needed. Head-Royce remained open. The City granted our request and installed "Slow Streets" signage on Alida Street, portions of Laguna Ave. and Potomac Street (the so-called Head-Royce "loop"), explicitly stating they were "Not Thru Streets."

However, Head-Royce drivers continued to use these streets to make turnarounds back up to the hills, where most Head-Royce parents lived.<sup>25</sup> After numerous pickets, requests, and a stakeholder meeting with Oakland Department of Transportation (DOT), Head-Royce administration agreed to "ask" its parents to use alternative routes. Parents did not comply and continued to use Slow Streets as if the signs were not there.

Residents then asked the mayor for assistance securing compliance from Head-Royce first on April 20, 2021, in a letter signed by 50 residents describing the situation.<sup>26</sup> We received no response. Residents followed up on May 20, 2021 as the traffic worsened, and a driver crashed into a resident's house on Alida Street.<sup>27</sup> We again received no response. Both of those requests are attached here as Exhibit 2 and Exhibit 3, respectively.

Finally, without any engagement with the affected residents, DOT unilaterally notified the neighborhood on NextDoor that it was removing Slow Streets because AC Transit buses needed to use the streets. The City's notice made **no mention** of Head-Royce or its hundreds of cars that followed on the tails of the one or two bus lines that used the route. (See Exhibit 4)

---

<sup>25</sup> E.g., DEIR, Appendix 14, Figure 2.

<sup>26</sup> See attached Exhibit 1, Resident's letter to Mayor Schaaf entitled "Please Protect Our Slow Streets against Head-Royce Commuter Traffic"

<sup>27</sup> See attached Exhibit 2, Resident's letter to Mayor Schaaf entitled "Second Request to Protect Slow Streets Against Head-Royce Commuter Traffic"

The Slow Streets issue proves that the Head-Royce School administration has no ability to secure compliance from its parent driving community. It is also a marker that the City has not enforced rules or traffic violations against them. Traffic conditions can only worsen with the growth of the school population by any amount.

**CONCLUSION**

The misuse of data and incompleteness of the DEIR calls into serious question the validity and credibility of its conclusion that there will be no significant traffic impact resulting from the school expansion. We request that further study be undertaken, that data gaps be filled and validated, and that this information be shared with the public.

Please direct responses for the NSC to Karen Caronna at [kamaca9@gmail.com](mailto:kamaca9@gmail.com). Thank you for your consideration of our comments.

Best Regards,

Neighborhood Steering Committee

Karen Caronna  
Karen Young  
Hollis Matson  
Deborah Royal

Rod Thompson  
John Prestianni  
Lori Gielegem  
Gregory Tiede

Anne Purcell  
Peter Ton (in support of the NSC)

Enclosures

- Exhibits 1.i – vii: Collected Documents regarding Non-Compliance
- Exhibit 2: Residents' First Letter to Mayor Schaaf re: Slow Streets (April 20, 2021)
- Exhibit 3: Residents' Second Letter to Mayor Schaaf re: Slow Streets (May 25, 2021)
- Exhibit 4: Correspondence with the City re: Elimination of Slow Streets (August 2021)