



SYLVAN UNION SCHOOL DISTRICT

605 SYLVAN AVENUE ✦ MODESTO, CA 95350 ✦ (209) 574-5000 ✦ FAX: (209) 524-2672

www.sylvan.k12.ca.us

July 30, 2018

DEBRA M. HENDRICKS
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John B. Anderson, Project Planner
City of Riverbank, Development Services Department
6707 3rd Street
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Re: Response to Notice of Draft Environmental Impact Report

Dear Mr. Anderson:

Thank you for the Notice of Availability of the Crossroads West Specific Plan Draft Environmental Impact Report.

As identified in the report, the Sylvan Union School District will serve the Crossroads West area for grades TK-8th grade. There are potentially significant impacts to the Sylvan Union School District.

Pages 2.0-7 & 8 provides the average expected densities, and at full build out it is expected we will need to provide services to an additional 524 new elementary students and 327 new middle school students.

	Units	Rate	Elementary		Units	Rate	Middle
Low Density Residential	1,521	0.28	426		1,521	0.15	228
Medium Density Residential	144	0.28	40		144	0.15	22
High Density Residential	310	0.083	26		310	0.111	34
Mixed Use	388	0.083	32		388	0.111	43
Total Units	2,363						
Total Potential Students			524				327

For comparison purposes, the existing Crossroads East Specific Plan identified an average of 2,294 household units when it was planned. We are currently collecting taxes on 1,847 units. The existing units have generated approximately 850 elementary students, and approximately 525 middle school students, all located in Riverbank.

The district currently serves 499 middle school students with Riverbank addresses and bus the students to Ustach Middle School in Modesto. When combining the current middle school students (499) with the expected 327 new students illustrates the need to build both a middle school and an elementary school. **A middle school will be the district's first priority with 20 acres required to build a middle school.**

Throughout the Draft EIR there are numerous references to potential school sites, correctly identifying the required acreage. Figure 2.0-8 Conceptual Land Use Plan

Our Mission:

To provide a dynamic, broad-based education that prepares each child to be a contributing member of society.

identifies a school site that is centrally located, and is a preferred location as previously communicated in our letter of April 11, 2017 (attached). However, the second school site is not centrally located and is contrary to the plans assertions that schools will be planned to accommodate the concept of a "neighborhood school" (walking distance).

The City of Riverbank General Plan Goal for the Air Quality Element AIR 1.4 states schools shall be located, designed, and the surrounding area planned to ensure that students can safely and conveniently walk or bicycle to school from their homes." In addition, Public Services and Facilities Element Public 9-1 through 9-5 specify guidelines to ensure "school sites are designed to allow easy pedestrian and bicycle access from surrounding neighborhoods."

Page 3.12-20 indicates that new students generated by the Crossroads West Specific Plan will attend Crossroads Elementary School and Elizabeth Ustach Middle School. This will not be possible because both schools are currently exceeding capacity. The district will need to develop a bussing plan to accommodate new students generated to existing schools throughout the entire district until a new school can be built. This will be a burden for both the district and families. Instead early planning for financing and building new schools to stay ahead of new growth is necessary.

Page 3.12-21 references the need to address environmental concerns related to current and past agricultural operations, specifically referencing Mitigation Measure 3.8-1. If mitigation measures are necessary to accommodate centrally located schools as specified by the City of Riverbank's General Plan, the district respectfully requests that all mitigation efforts are planned and agreed to prior to annexation of the property into the City of Riverbank.

In summary:

1. We agree with the placement of a new school near Crawford Road as identified on Figure 2.0-8. Twenty (20) acres will be required to build a middle school at this location.
2. We disagree with the placement of a second school located near Morrill Road identified on Figure 2.0-8. Ten (10) acres will be needed. (See April 11, 2017 correspondence and attached school site preferences).
3. The placement of the schools should be centrally located to support the concept of a neighborhood school within walking distance from home to school.
4. Establish suitable and safe school bus stops, and paths of travel for students that may walk and bicycle to school.
5. Establish safe crossing routes for students that will cross Oakdale Road to attend a centrally located middle school.
6. Work cooperatively with both the Sylvan Union School District and Modesto City High School District to develop a funding plan to build schools and to ensure mutually acceptable solutions to expected impacts including mitigation of all environmental concerns.
7. Mitigation of all environmental concerns related to current and past agricultural operations.

Thank you for the opportunity to provide comments to the Draft EIR. Please contact me or Yvonne Perez, Assistant Superintendent of Business Services with any questions.

Sincerely,


Debra Hendricks, Superintendent

Copies to: Sylvan Union School District Board of Trustees



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605 SYLVAN AVENUE ✦ MODESTO, CA 95350 ✦ (209) 574-5000 ✦ FAX: (209) 524-2672

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April 11, 2017

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City of Riverbank
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Re: Notice of Preparation of an Environmental Impact Report for the
Crossroads West Specific Plan

Dear Mr. Anderson:

Sylvan Union School District staff has reviewed the information provided for the above referenced project. The following concerns are submitted:

1. Placement of the school. The placement of an elementary and a middle school should be centrally located to support the concept of a neighborhood school within walking distance from home to school.
2. The district provided a map of 3 different preferred areas within the specific plan for schools per your request on April 21, 2016, but the school designation in this document does not reflect the requested change.
3. 30 acres of land are needed to build one elementary school (10 acres) and one middle school (20 acres). (See attached map)
4. Schools must not be planned in areas that require environmental remediation.
5. The project may yield housing units beyond the district's busing policy of 1 mile for elementary students and 2 miles for middle school students. Therefore, please insure that provisions are provided to establish suitable (safe) school bus stops for the area.
6. Based on the Land Use Designation and units per acre provided on page 3 and 4 of the report, and based on student yield factor from our Developer Fee Justification Study, the projected number of students projected is:
 - Elementary 668 students (TK-5th Grade)
 - Middle School 369 additional Riverbank Students (Grades 6, 7, 8)
 - Currently there are 483 middle school students residing in Riverbank, projecting a total middle school enrollment of 852 students.

Thank you for the opportunity to provide input. If you have any questions or comments, please contact Yvonne Perez, Assistant Superintendent of Business Services at (209) 574-5000 ext 233.

Sincerely,

Debra Hendricks, Superintendent

Copies to: Sylvan Union School District Board of Trustees

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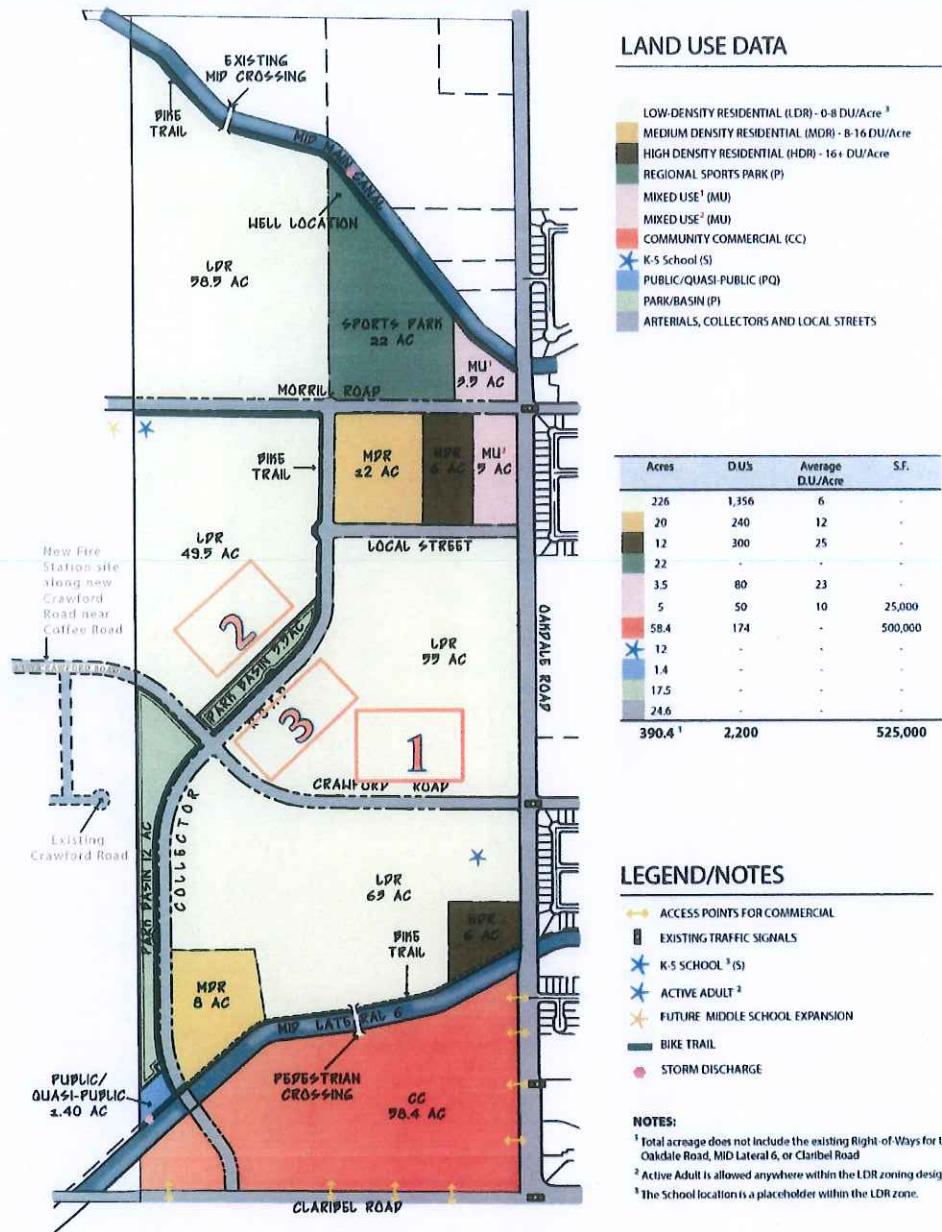


Figure 4 – Proposed Crossroads West Land Use Map