



## SI Neighborhood Association

October 5, 2020

TO: San Francisco Board of Supervisors

RE: BOS File #200992 and #200996 - Saint Ignatius Stadium Lighting Project

Dear Honorable Supervisors, thank you for taking the time to read this, our final letter to ask you to consider upholding our appeals.

### **Introduction**

We, the undersigned, are members of The Saint Ignatius Neighborhood Association (SINA) with valid concerns about the permanent impact of the Saint Ignatius (SI) proposed stadium lighting on our neighborhood. We have raised funds for a lawyer and consultants who are helping us at a reduced rate or pro-bono. Our neighbors have written letters and we have filed appeals asking the project sponsors to conduct studies to better understand the impacts of these stadium lights planned to be in use 150 nights a year.

However, it is obvious we are being outmatched by a powerful and rich institution with a wide influence in our city. Saint Ignatius has the financial ability to hire a big time lawyer and the clout to barrage the BOS with form letters solicited from their 1,000 + member alumni association.

SINA has no such resources – we're a small group of neighbors opposing a powerful institution. We appreciate this one last chance to demonstrate how SI has not been open or engaged with their neighbors. And, in the end we are simply being railroaded into a project that will only benefit SI -- to the permanent detriment of their neighbors and the wider residential neighborhood surrounding their campus.

**SI continues to minimize both the impact and scale of this project. We have demonstrated valid arguments against this destructive project and studies should be required before the permit is approved.**

We have shown, to the best of our ability that this new introduction of stadium lights has ramifications that SI and SF Planning continue to minimize. Any lights, no matter how state-of-the-art, still result in the introduction of a new and unprecedented nighttime sports activities 150 nights a year with the impacts we have investigated and put on the record.

SI has accused us of 'unscientific' analysis of these impacts, i.e. noise, light, parking. However, it is not up to our Association, or our consultants to conduct studies – it is, and should be, the project sponsor's responsibility. SI is not being held accountable or being required to do any sort of studies by SF Planning. It is in the best interest of the neighborhood and SI, their students/parents to fully understand the impact of night use of the athletic field on 150 nights a year which will affect us all for many years to come.

This Stadium Lighting permit should never have been approved without proper impact studies and analysis.

### **SI gets streamlined through SF Planning and has done so for many years.**

Their practice lights were installed in 2003 without any pre-planning notification to the neighbors and with an expedited CUA permit process.

The original 2018 CUA application for this project which was re-submitted early this year was not only woefully inadequate; it was re-named as a Verizon-only project so as to grant 'essential' project status during Covid19. Once our association realized it was a Verizon antenna that just happened to be located on one of four proposed SI stadium lights – we asked questions and raised objections about the permit – it suddenly got taken down off the Accela site and re-surfaced with new provisions and language.

Over the last six months through the three Commission Hearing continuances the SINA took the time and expended our resources to research the project, understand the regulations, scrutinize the application materials, and question Planning and Saint Ignatius in our numerous communications and submittals.

This scramble to augment the permit (after SINA documented its flaws) has gone on throughout the SF Planning process -- right up until the final motion was signed after the July 23 Hearing.

Most concerning is SF Planning's most recent letter (9/28/20) which quotes directly from the letter SI sent to the BOS and signed by their attorney.

This should cause all of us to question SF Planning's impartiality and true rigor when evaluating SI's application for these stadium lights.

### **SI's communications about this project have been one-sided, unclear, and constantly changing.**

Since early March when this project resurfaced (after SI put it on hold for 2 ½ years), our questions have not been answered, neighbors objections not heard, there has been no dialogue, and most distressing - SI's ever-changing explanation of usage of these lights.

In previous documents we have extensively detailed how our neighbor concerns and legitimate arguments have fallen on deaf ears. During the Planning Commission hearing, even the commissioners were confused and had to grill SI administration to answer basic questions regarding the use of the lights - including the number of nights and use by affiliates (non-SI usage).

SI claims in their recent letter that we have spread mis-information among our association members – that is patently untrue – we communicated what was communicated to us by SI. If SINA is confused it is not our fault.

We've asked for a neighborhood wide meeting to clear up any misunderstandings - but SI refused to meet with us for future discussion or to answer our questions. They agreed to meet with four members of our association as their 'requirement' for the second pre-planning meeting before the Commission hearing.

SI says their stadium lights will not increase their sports events but will allow them to shift them into the nights. However SI has never been clear on the number of sports events currently conducted on their football field. SI's current field usage numbers aren't even consistent between the most recent SF Planning and SI documents.

However, no matter what the current versus new usage -- for almost half the year SI is proposing new use by introducing nighttime sporting events.

In their 9/28/20 letter, SI has misrepresented their use of temporary lights saying "these portable lights are typically used 40 to 50 nights per year". In the past, SI only used temporary lights 1-2 nights a year and only late in 2019 did they start to bring in lights for an extended period of time (4 weeks in late 2019; 2 weeks in 2020). Many of those nights, the lights were on with no one on the field and other nights there were only 7-8 students practicing (they could have used SI's existing practice field with lights).

The actual 'event or practice' use of those temporary lights was in reality much less than the 40-50 nights SI claims.

SI's letter's also references their 79 athletic teams who would benefit from the lighting which suggests all 79 teams use the field (this information also appears in the SF Planning's response letter). According to the project application materials, only 17 teams actually use the field – 3 football teams, 6 soccer teams, 4 lacrosse teams, and 4 track/field teams.

It is very misleading to suggest that all 79 school teams would benefit from the lighting.

Both Planning and SI seem to believe that if they keep saying the same things over and over - even if untrue or misleading, that they will surely become true – with no evidence to back them up and despite our evidence to the contrary.

## Compromise – what compromise?

We had suggested an alternative plan, which SI dismissed, and they have since refused to conduct any sort of neighborhood meeting to discuss compromises of any sort. We would potentially be interested in discussing some further compromises within their current project plan – but we've not been given any opportunity to do so.

## Concluding Comments

It is important to recognize that we are not anti-sports nor do we want to change SI's current sports programs at all. We want SI students to have healthy and non-stressful sports programs as they are currently conducted.

We also applaud SI's voluntary move to follow California SB-328 that mandates later start times for public and charter schools (private schools are not subject to this law). This is healthy for their students as is their current active and reasonable sports programs

We reiterate our concern that if the lights are installed, it is unlikely that SI will comply with the CUA conditions.

Are they going to dim lights and then shut them off if a game or event is still in progress at the appointed dimming or shut off time? **No, they won't stop a game before its end – who would?** Will they abide by the limit on the total number of nights? We don't know – the neighbors would have to count each and every night the lights are on to monitor compliance with that condition. **Then, what happens on the 151<sup>st</sup> night – will SI stop that game or practice and turn off the lights - doubtful.**

Attached are some final arguments from our attorney and consultants for your consideration when making your decision during the October 6th Hearing.

We thank you for your time and consideration of our appeals.

Sincerely,  
Saint Ignatius Neighborhood Association

[signing members listed below]

Attachments:

- BOS File #200992 M. Graf Esq. CEQA Rebuttal\_2020\_10\_05
- BOS File #200992 K Lagios CEQA Rebuttal \_2020\_09\_30
- BOS File #200992 and #200996 CHEE LLC Rebuttal 2020-10-05

Stanley & Valerie Chan  
Venus Wang  
Vicki Tamola  
Ray & Deborah Brown  
Kristina Scolari  
Randall & Rachel Hung  
Linda Delucci  
Yuriko & Adelle Kearns  
Celia Wong  
Ernest & Barbara Lim  
Brendan Kenneally  
Kingo & Akiyo Arimoto  
Alex & Effie Sue  
Waiyee Chan  
Joseph & Seiko Grant  
Susan Lin  
Stephen & Myrna L.  
Wilkerson  
James & Joy Yee  
Harry Stein  
Joe Wong  
Astrea Centin  
Ernest & Tiffany Pavon  
Kevin & Kitty Sun  
Mrs. Betty Lew  
Paula Katz  
Julia Kwan  
Jack & Amy Allen  
Damien Nunez  
Priscilla Fong  
Matthew & Josette Goedert.  
Tim & Allison Harrington  
Robert Yuen  
Joann Kujaski  
Katherine Cuellar  
Matt Ciganek  
Michelle Dubonnet  
William & Jennifer Hom  
Kai Ng

Vincent & Kathie Mar  
Larry & Shirley Yee  
Samantha Chan  
Sandy & Peter Koch  
Jake & Kelsey Koch  
Gina Rose Montarano  
David Little  
Denise Malmquist-Little  
Dan Dooling  
Kristopher & Maria O'Brien  
Edmund Lim  
Nellie Lew  
Donald Ruhrmand  
Leland & Qiu Ming Chen  
Coral Ho  
Derek Tan  
Desmond & Philomena  
Fitzsimons  
Jay & Nina Manzo  
Rob and Julie Almeida  
Dorothea O'Brien  
Wing & Sandy Leung  
Sun Kim  
Zhi Li  
Donna Bruno  
Chen Qiu  
Connor Grant  
Carol Gilbert  
Joe Lai  
Jasmine Brownlee  
Roger Wong  
David Enloe  
Una Fitzsimons  
Maneesh Bhide  
Alan O'Brien  
Sarah Klein  
David Kwan  
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Bi Xia Tam

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Anna Paderna  
Isabelle Hurtubise  
Dan Dumont  
Joan Knutson  
Nicholas Torres  
Marie Malmquist  
Allen Malmquist  
Robert Lagamarcino  
Ron Lagamarcino  
Kathy Howard  
Chandrika Murthy  
James Clark  
Helen Mar  
Mary Shea  
Anne Marie Benfatto  
Gretchen Walton  
Liz Prosek  
Michael Harrington  
Karen Felzer  
Gina Meritt  
Rachel Chong  
Barbra Paul-Elzer  
The Silva Family  
Serena Llamera  
Nora Jang  
David & Christine Crosby  
Shirley Recipon  
Adrienne Lee  
Tim Brey  
Jon Lefors  
Karen Ho  
Elaine Breen-Brown  
Diane Marbello  
Rory Grant  
Susan Lynn  
Lance Mellon  
Michelle See