

**From:** [GISunsetNeighbors@hotmail.com](mailto:GISunsetNeighbors@hotmail.com)  
**To:** [BOS Legislation, \(BOS\); Board of Supervisors, \(BOS\)](#)  
**Cc:** [Mar, Gordon \(BOS\)](#)  
**Subject:** Email 4: BOS File #200992 and #200996, CEQA and CUA Appeal Supplement – Saint Ignatius Stadium Lighting (Planning #2018-021648CUA)  
**Date:** Thursday, September 17, 2020 11:33:37 AM  
**Attachments:** [Outlook-hhvbttbd.png](#)  
[BOS File #200992 and #200996 - SINA Commission Submittal 1 - 2020\\_05\\_06.pdf](#)  
[BOS File #200992 and #200996 - SINA Commission Submittal 2 - 2020\\_06\\_09.pdf](#)

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**To: Clerk of the Board of Supervisors**  
**Fr: SI Neighborhood Association**

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Attached please find two documents that supplement the CEQA and CUA appeals filed under BOS File #200992 and #200996 for the Saint Ignatius Stadium Lighting Project.

These documents were originally submitted to the Planning Commission in advance of the 7/23/20 Commission hearing on the project.

We would like to put them in the Board of Supervisors records for our appeals.

Kindly confirm receipt.

Thank you

Deborah Brown, Secretary



SI Neighborhood Association

**May 6, 2020**

**Via Email To:**

Planning Commission Affairs [Commissions.Secretary@sfgov.org](mailto:Commissions.Secretary@sfgov.org)  
Jeff Horn, Senior Planner, Current Planning [jeffrey.horn@sfgov.org](mailto:jeffrey.horn@sfgov.org)

**RE: PLANNING CASE NUMBER 2018-012648CUA - SAINT IGNATIUS STADIUM LIGHTING PROJECT**

Dear Planning Commission Secretary and Mr. Horn,

The Saint Ignatius Neighborhood Association (SINA) is an association comprised of over 120 neighbors who live in the area surrounding Saint Ignatius College Preparatory, located at 2001 37<sup>th</sup> Avenue in the Sunset District. We are writing concerning the proposal to install stadium lighting at the Saint Ignatius athletic field as a Conditional Use (Planning Case No. 2018-012648CUA).

**A: SUBMISSION IN ADVANCE OF THE PUBLIC HEARING**

The SINA has prepared the attached Advance Submission documentation in accordance with the Planning Commission's hearing procedures. We want to ensure that Commissioners have the opportunity to review our detailed comments and supplemental materials well in advance of the Commission hearing that will consider the Saint Ignatius stadium lighting project proposal. In light of the COVID19 crisis and per Mr. Horn's emailed instructions, this submittal is being provided via email only.

**B: REQUEST FOR CONTINUANCE**

We urge the Planning Commission to continue consideration of the project, currently scheduled for Commission review at a public hearing on May 14, 2020. There are two reasons for this request:

1. The attached Advance Submission describes in detail the ways in which the application is inadequate and incomplete. It does not fully or accurately describe the project scope, has not fully evaluated project impacts or conducted sufficient investigations to do so, and it does not demonstrate that the project would be in compliance with the San Francisco Planning Code and related requirements. We urge the Commission to require the applicant to conduct all necessary studies prior to any public hearing to consider the project proposal.

Specifically, Saint Ignatius should prepare and provide:

- A CEQA Environmental Impact Report to assess all potential impacts for their level of significance;
- the traffic and parking study claimed to be completed;

- a geotechnical investigation;
- a formal noise study; and
- a formal lighting study.

In addition, the application should be revised to explicitly include the Verizon wireless facility that provides significantly more detail about the entire project so that the Commission and the public can fully understand the project scope. We believe the application should be refiled as a Variance application rather than a Conditional Use application.

2. The COVID-19 Shelter in Place Order has been extended through May 31, 2020 making it illegal for the Commission to hold, and the public to attend an in-person hearing. Although there are provisions for remote access to Commission hearings, such access is an inadequate substitute for live participation and interaction. As evidenced by the well-attended remote Pre-Application Meeting/Neighborhood meeting on April 29, 2020 there are significant neighborhood concerns about this project and many neighbors would undoubtedly attend an in-person public hearing if they could. There is simply no justification to push this non-essential project forward at this time.

**B: CONFLICT OF INTEREST**

The SINA recognizes that Saint Ignatius is a well-known institution with a long history in the City. As such, we are concerned about the possibility of potential real or perceived conflicts of interest. We trust that all City government employees who are directly involved with this project have, or will promptly recuse themselves from participation in, and decision-making on the proposal if they have any current or prior personal or professional relationship with Saint Ignatius. Such relationships may include but are not limited to school alumni, individuals with children who attended or now attend the school, and individuals having relationships with the school's administration. This would also include individuals having personal or professional relationships with the primary project partners including Verizon Wireless, Ridge Communications, Verde Design, and Musco Lighting.

Thank you for the opportunity to provide this Advance Submission and present our deep concerns about this project proposal.

Sincerely,

*Deborah Brown*

Deborah Brown, Secretary  
Saint Ignatius Neighborhood Association  
[sisunsetneighbors@hotmail.com](mailto:sisunsetneighbors@hotmail.com)

Attachment: SINA Advance Submittal documentation

# **Advance Materials Submittal to the San Francisco Planning Commission for the Saint Ignatius Stadium Lighting Project**

## **Introduction**

Saint Ignatius College Preparatory (SI) located at 2001 37<sup>th</sup> Avenue has filed a Conditional Use Authorization Application (#2018-012648CUA) to build four (4) 90-foot tall permanent stadium lighting poles, one with wireless antennas on their campus football field. They have done so without any Environmental Impact Review and with inadequate neighborhood engagement.

The Saint Ignatius Neighborhood Association (SINA) was formed in October 2016 to represent the concerns of neighbors to Saint Ignatius about this specific project. We currently have over 120 members.

Our concerns and issues with the impacts of these stadium lights are detailed in this Advance Materials Commission submittal for the Commission hearing scheduled for May 14, 2020.

We request that the San Francisco Planning Commission deny this application and require, at a minimum, that SI conduct a complete Environmental Impact Review.

## **Background**

SI is located in the outer Sunset, which is a quiet, residential neighborhood with a high concentration of multigenerational owner-occupied single-family homes, young middle-class families, senior citizens and Chinese speakers.

SI originally proposed their permanent stadium lighting in 2015. They hosted two neighborhood discussion meetings in 2015 and engaged in email communications with us during 2016. We had open discussions with the SI administration regarding our questions, objections, and concerns.

SI was, and still is, unable to resolve the majority of their neighbor's issues, with the exception of some minor traffic flow issues. Specifically, they installed speed bumps on 39<sup>th</sup> Ave to slow speeding and did some adjustments to their 37<sup>th</sup> Ave student pick up and drop off procedures which eliminated the double/triple parking problems on that avenue.

SI put their stadium lighting project on hold in November 2016. There were no further meetings or discussions during the next three years (2017-2019).

In 2018 Saint Ignatius filed a separate CUA application for their Fr. Sauer Academy – a tuition-free middle school program for low income students. The neighbors did not object to this



proposal and thought it was a fine program. Our only request was to have the permit amended to ensure the additional 100 students be restricted to middle school students – therefore not increasing high school student vehicles and parking. SI agreed and the Fr. Sauer Academy has not caused any significant issues for neighbors.

In September 2018, SI filed its stadium lighting CUA application with SF Planning and this CUA remains unchanged for the current 2020 project.

SI does have permanent field lights for a practice field located on 37<sup>th</sup> Ave., next to their tennis courts. Those lights are 40 feet tall and must be turned off by 7:30 pm under that CUA.

### **Current Project Status**

The SI stadium lighting project resurfaced in early March 2020 with a paper notice from Verizon of a March 18, 2020 neighborhood meeting

On March 12, 2020, Saint Ignatius administration met with two SINA representatives for an informal discussion. No handouts or presentation were provided.

Subsequently, both the March 18, 2020 meeting and all future planning commission meetings were cancelled due to the COVID19 crisis and shelter in place requirements.

The project is now back on the SF Planning Commission Meeting schedule for May 14, 2020 and a Neighborhood Meeting was held on April 29, 2020.

## **Neighborhood Association Objections and Concerns**

### **Unclear and Misleading Project Communications**

In early March 2020, the neighbors within a 500-ft radius of the football field received the mailed Notice of Neighborhood Meeting from Verizon – there was no mention of Saint Ignatius on the mailed envelope. As a result, many neighbors threw the notice away thinking it was Verizon promotional material.

The notice states the project applicant as Verizon Wireless -- however the project description explains that the wireless project is now combined with the proposed four (4) light poles located on the Saint Ignatius football field – one of which would hold Verizon wireless equipment.

We believe this was very misleading.

## SI Seeking Stadium Lighting Approval During COVID 19 Crises

Rather than wait until we could once again meet in person, SI has chosen to put this project into SF Planning review during our current stay-at-home requirements. Even though SI itself put the project on hold for three years, suddenly it is urgent, and considered 'necessary and required' under the auspices of a Verizon wireless antenna project, considered an 'essential' service within the COVID19 crisis.

Given the current SF Planning remote meeting requirements, the April 29th Neighborhood Meeting was conducted via Zoom/Phone in. As an association, we consolidated and pre-submitted our questions for both SI and Verizon. Individual neighbor questions were also submitted in advance via the 'Ask SI' link on their good neighbor web page.

The SINA had warned both SI and Verizon that they should expect 100 Zoom in/phone in neighbor attendees. We also pre-requested a Chinese translator for our Chinese speaking neighbors, but none was provided.

SI muted the 100+ attendees throughout the meeting. No one was permitted to speak, except the presenters.

Presentations covered the technical plans for the wireless antennas, a review of cell coverage issues in the wider Sunset district, and a lighting presentation with renditions of the LED light affects. Verizon answered our questions.

SI only partially addressed our first question and then stated that the rest of our questions 'did not apply to the project'. SI then ended the meeting 20 minutes early, without taking the attendees off mute nor responding to any questions that were submitted during the meeting via the Zoom chat feature

We were extremely frustrated by this Neighborhood Meeting and how it was conducted.

In good faith, the SINA re-submitted our 10 questions to SI the next day with clarifications as to how each question related specifically to the project. We also asked for a copy of the presentation and a transcript from the Neighborhood Meeting. *(at the time of this submittal we have not received responses to either request).*

We believe SI is taking advantage of our current COVID19 situation. Given our current distractions – with our children schooled at home and having work remotely – SI hoped their neighbors would not pay attention to the Verizon-only permit application and would not engage in the project or voice our objections with San Francisco city officials.

Clearly, the remote meeting requirements are working to SI's advantage – they can finally 'mute' their neighbors.

In the past, SI conducted their stadium lighting proposal interactions with us in good faith – they had open neighborhood informational meetings, listened to our concerns, and did attempt to address them. But now, we are very disappointed that SI would conduct business in this manner.

### **The Impact of Temporary Field Lighting**

In previous years, SI has rented field lighting for select night time football games. During those games we experienced extreme noise levels, with cheering, band music, game announcers and recorded music blaring over loudspeakers. The games typically lasted until well after 9PM.

The associated noise prevented us from having normal dinner conversations, hearing our televisions, or getting our children to sleep. Even neighbors several blocks away complained about the noise. There were also pre and post-game celebrations with drinking, public urination, cars honking and loud cheering.

These games attracted not only SI students/fans, but also the opposing team's students/fans. Not only did we experience high traffic volumes, but also found our driveways blocked and no available street parking. We and any friends visiting us had to park many blocks away.

After the games everyone went home, and the neighbors were left with litter and broken bottles, and overly tired children.

SI remains unclear on the exact number, but as you will see in our attached technical comments, a 2018 SI document projected approximately 66 nights of games with lights on until 10PM, and 68 games with lights on until 9PM, apparently in addition to 150 practice evenings with lights on until 8:30PM. At the time, SI also planned to rent out their field for 75 additional nights until 10PM.

This projected usage constitutes potentially a full year of disturbed nights in our neighborhood.

Starting in November 2019, for a five (5) week period, SI rented field lights to accommodate their need for practices and league sports. The lights were often left on even when the field was not in use. Some nights there were only 6 or 7 students/coaches on the field.

SI already has a permanently lighted practice field that could have served to accommodate those smaller practice needs. This sporadic usage does not seem to support SI's claimed need for permanent stadium lights.

## Summary

### The Impact of Permanent Stadium Lights

By and large, the neighbors enjoy living near Saint Ignatius – it is a fine institution and their students are generally well behaved. We are accustomed to SI's presence and accept the associated noise, traffic, and parking issues during school hours, early evenings, and weekends.

We want to be clear that we have no ill will whatsoever toward the school. What we are opposed to is not the school itself, but the transformation of our neighborhood that would occur if this project moves forward.

Now, for most of the year, our quiet residential neighborhood will have its evenings severely disrupted with the noise, traffic, parking issues, litter, and partying we have only had to endure a few nights in the past.

This lighted stadium field will be for exclusive use by a private school and will not add to San Francisco public recreational space. These stadium lights will permanently change, and negatively impact our neighborhood and quiet, peaceful evenings with our families and friends.

In the March 12, 2020 informal meeting, one member of the SI administration explained that stadium lights, and the ability to have night time sporting events, would be a strong asset for attracting top high school athletes to their private school.

The SINA believes that this is exactly the reason SI wants to install permanent stadium lights – not for the students, not for their existing sports programs – but as a marketing tool.

SI claims they need to move into night time practices and games because the school day is starting one hour later but we question their overall motivation. Why would they need lights until 10PM if the school day would start only one hour later?

We are unaware of any other high school in San Francisco with night time stadium lighting. These schools are able to have vibrant sports programs (balanced with their educational classes) during day light and early evening hours.

As one neighbor stated – “Is anyone thinking about the SI students? After a full day of school, SI wants to push them to practice and play sports until 10 pm. They should give their students a break, let them go home at sunset to do their homework and get some sleep.”

Saint Ignatius continues to focus their public engagement on the specifics of their planned equipment – namely the type of lighting, the reason for the height of the lighting poles, and the technicalities of the wireless antennas. While the project application provides seemingly plausible reasons to approve the project, the application is woefully inadequate. It does not

fully or accurately describe the project scope, its impacts, or how it complies in full with the San Francisco Planning Code and related requirements.

SI neighbors are more concerned about the far larger issue -- the **impacts** of permanent nighttime stadium lights.

### **Alternate Proposal**

While SI's rented temporary lighting did cause some disruption, the occasions were temporary (*up until this last year*) and were generally infrequent. Therefore, during 2016 discussions, the SINA asked Saint Ignatius to consider an alternative plan of continuing to rent field lights as needed: a) for specifically needed games, b) a few times a year, and c) only on Friday or Saturday nights - thereby not disrupting our children's homework/bedtimes during the week.

The neighbors could live with this plan in the future, if conducted under strict limitations and with advance notice to the SINA so the neighbors can plan for the disruptions.

SI responded that approach would not work for them.

The SINA understands that it is impossible to mitigate all issues, but SI seems intent to move forward with their permanent stadium lighting proposal -- without open discussion or any attempt to compromise with their neighbors.

### **Additional Information**

We would like to draw your attention to a very similar lighting project proposed at Marin Catholic High School in 2016 using the same lighting technology on 80-foot poles. The Marin County Planning Department rejected the application for a variety of reasons that mirror our concerns. The applicant withdrew the application in 2017 rather than have it formally denied and there has been no project-related activity since.

Unlike Marin Catholic however, where homes are located farther away from the athletic field, the homes surrounding Saint Ignatius are very close by and residents will be even more impacted by this proposed project.

Attachment 1 herein is a copy of the Marin County Planning Division which we hope you find informative for your deliberations on the SI project.

Attachment 2 herein provides our more detailed technical comments that address our concerns in the following topic areas:

1. The current project application should not receive clearance for categorical exemption under CEQA without additional information.

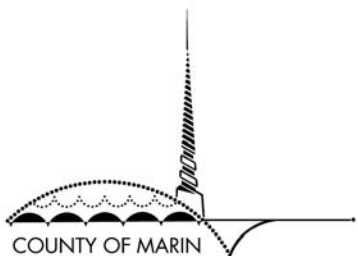
2. Saint Ignatius has not complied with the requirements or spirit of public disclosure and engagement.
3. The proposed stadium lighting, with or without a wireless facility, is contrary to the Planning Code height and bulk district restrictions.
4. The proposed project constitutes a new and/or changed use under the Planning Code.
5. The application is incomplete since it does not demonstrate compliance with numerous applicable provisions of the Planning Code.
6. The project does not appear to meet applicable CALGreen light pollution requirements.

Each topic in the technical comments is numbered, followed by one or more statements of Fact based on our understanding of the project and applicable regulations. Each numbered Fact is followed by one or more like-numbered Comments. Underlines throughout the document are added for emphasis.

**ATTACHMENT 1**

**MARIN COUNTY PLANNING DIVISION**

**2016 LETTER RE: MARIN CATHOLIC HIGH SCHOOL LIGHTING PROPOSAL**



November 21, 2016

Mike Bentivoglio  
1620 Montgomery Street, #102  
San Francisco, CA 94111

Project Name: Marin Catholic High School Use Permit Amendment and Design Review

Assessor's Parcel: 022-010-35  
Project Address: 675 Sir Francis Drake Blvd, Kentfield  
Project ID: P1123

Dear Mr. Bentivoglio,

You have requested approval to install a field lighting system on Marin Catholic High School's outdoor football field so that the school can use the field during the evening hours for evening sports practices and games, including Friday night football games. The proposed project includes the installation of four 80-foot tall light poles with differing LED lighting fixture arrays, installed on the 10 yard line at each side of the field. Each proposed pole would feature 16 light fixtures. The two poles proposed on the south side of the field would feature one additional fixture illuminating the home bleachers. The pole proposed at the northwest side of the field would feature 2 additional fixtures at the 15-foot elevation to provide field up-lighting, and 2 additional fixtures would be installed at the 15-foot elevation to provide illumination of the bleachers. The pole proposed at the northeast side of the field would feature 3 additional fixtures at the 15-foot elevation to provide additional up-lighting.

**As proposed, the field would not be available for use by the public or outside organizations during evening hours (when the field is lit); the field would only be utilized for games and practices associated with Marin Catholic's athletics programs.**

The initial application was submitted on January 14, 2016. Planning staff deemed the application incomplete on February 14, 2016, citing items of incomplete application, along with merits comments related to the Design Review and Use Permit findings. The application was resubmitted on August 15, 2016, at which time additional technical information was provided. In response, we re-iterated our concerns with the merits of the project. **As proposed, we believe that the project is not consistent with the mandatory Use Permit and Design Review findings because the combined effects of the project related to the projected light and glare, noise, and traffic congestion would adversely affect the character of the surrounding community.**

More specifically, Use Permit finding D. states that "the granting of the Use Permit will not be detrimental to the public interest, health, safety, convenience, or welfare of the County..." Further, Use Permit finding C. states that "the design, location, size, and operating characteristics of the proposed use are compatible with the existing and future land uses in the vicinity". In addition, Design Review finding B. states that "the project will not result in light pollution, trespass, glare, and privacy (impacts)".



The following outlines a few of our key concerns:

### **Light, Contrast, and Glare**

Marin Catholic School is located at the base of Ross Valley, which is characterized by a mix of small-scale commercial and residential development along the Sir Francis Drake corridor, and residential neighborhoods along the sides and ridgelines of the valley. Mount Tamalpais and adjacent open space areas are readily visible to the west. Presently, the valley is relatively dark during the evening hours, with the exception of Marin General Hospital, and the silhouettes of the surrounding ridgelines and mountains fade slowly as evening progresses. The proposal to install 80-foot tall light poles around the perimeter of an athletic field at the base of Ross Valley would alter the existing ambiance of the valley. **While the notion of light pollution, spill light, and glare are subjective, it is apparent in reviewing the application that the addition of a field lighting system at the school would result in a level of light contrast and light pollution that is out of character with the neighborhood.**

### **Noise**

**The proposed project, installation of a field lighting system on an existing school athletic field, would essentially serve to extend the hours of activity on the field.** The noise impact report, prepared by your consultant, used Countywide Plan policy NO-1c. as the benchmark in analyzing the noise impacts associated with night time use of the field. In conducting the field analysis, noise measurements were taken from various properties surrounding the school. The noise modeling was then predicated on those noise measurements. Per the report, there would be as much as an 11 decibel difference (with a maximum of 71 decibels) between the existing ambient noise levels and the noise levels that would be generated during a Friday night game, as measured from neighboring properties. Other types of sports games and practices are anticipated to increase decibel levels by as much as 10 decibels, as compared to the existing ambient noise levels during evening hours in the surrounding neighborhood.

**Our opinion is that the nighttime use of the field should be treated as a new use rather than an existing use because the field is not usable during the evening hours without a lighting system.** Accordingly, we believe that the applicable Countywide Plan noise policy is NO-1a, not NO-1.c, as is used in the noise study. Policy NO-1a indicates that, as a guideline, through CEQA and discretionary review, the County should aim to limit the maximum decibel level for new night time uses to 65 dB (60 dB for impulsive noise), as measured from the property line.

In reviewing the proposed project with respect to the anticipated noise impacts that would result from activating a presently dormant athletic field during the evening hours, **it is apparent that there will be a notable change to the noise levels in the surrounding neighborhoods, where the existing ambient noise levels are relatively low during the evening hours.** Furthermore, an assumption could be made that the noise impacts that would be generated as a result of the project, when measured from the school's property line in accordance with NO-1a., would exceed the recommended standards.

### **Traffic**

Your application includes a complex matrix of field practices and game times. **The school currently utilizes temporary construction lighting fixtures during the evening hours; however because the temporary field lighting has not been approved, the baseline condition is the day time use of the field.**

The installation of a field lighting system would result in additional PM peak hour trips during the work week. According to your traffic analysis, your proposal to host Friday night football games would result in an additional 722 pre-game PM peak hour and 754 post-game peak hour vehicle trips. Placing this many additional vehicles on the road during the Friday PM peak hours would alter traffic flows at the already impacted intersections in the vicinity of the school, causing more inconvenience to others in the neighborhood without offsetting that inconvenience with public benefits. Moreover, an increase to traffic volumes at such a magnitude could contribute to the existing challenge ambulances and other emergency vehicles face in reaching Marin General Hospital.

The traffic analysis is based on the proposed field schedule, which indicates that practices and all other games (not including Friday night football games) would generally occur outside the PM peak traffic hours. Per the traffic study, the project would result in lower volumes during the evening PM peak hours, as compared to the existing conditions, because the field schedule assumes a break in practices and games will occur.

With regard to the proposed weekday practices and games, we are concerned that while the proposed field schedule may be mitigatory in nature, it may be infeasible for the County to monitor or enforce. While the County's Traffic Division is responsible for monitoring traffic, the Community Development Agency is responsible for enforcing compliance with project approvals. Complicated schedules, such as the field practice schedule you have proposed, substantially increase the challenges associated with monitoring and enforcement. If we determine that a reliable monitoring program is too difficult to achieve successfully, then the mitigatory nature of the schedule would be rejected resulting in substantially higher traffic impacts.

In closing, we would like to reiterate that our recommendation that the project is inconsistent with the Use Permit and Design Review findings is not solely based on the impacts related to any one of the aforementioned categories, but rather the combined effects that will result from the project. We intend to prepare a summary denial for the Planning Commission's consideration at an upcoming hearing. You will have the opportunity to dispute our assertions during this hearing, but we also hope that you are willing to consider alternatives to your current project and present them to the Planning Commission to gain their insight and direction. While we cannot speak to your highest priorities or guarantee any particular outcome, we hope that you will consider alternatives that reduce the public detriments your project would have on the surrounding community. Please let us know if you would like the opportunity to formulate alternatives for the Planning Commission's review by December 15<sup>th</sup>, 2016.

Sincerely,

Jocelyn Drake  
Senior Planner

cc: Peter McDonnell, 1620 Montgomery St, #320, San Francisco, CA 94111  
Archdiocese of San Francisco, 1301 Post St, #102, San Francisco, CA 94105  
Supervisor Katie Rice  
Tom Lai, Assistant CDA Director  
Brian Crawford, CDA Director  
KPAB

**ATTACHMENT 2**

**SINA TECHNICAL COMMENTS ON**

**SAINT IGNATIUS COLLEGE PREPARATORY  
STADIUM LIGHTING PROPOSAL (#2018-012648CUA)**

**Technical Comments of the Saint Ignatius Neighborhood Association  
on CUA application #2018-012648CUA**

**1. The current project CUA application should not receive clearance for categorical exemption under CEQA without additional information.**

**Fact 1.A:** A CEQA Categorical Exemption Determination for the stadium lighting project (Record #2018-012648CUA) was issued on April 25, 2019 (Record # 2018-012648ENV). This document has since been removed from the Accela website and a revised, but an essentially identical document was posted on April 29, 2020 (coincidentally, the date of the most recent neighborhood meeting). The determination finds that the stadium lighting project falls under Categorical Exemption Class 1 – Existing Facilities. However, the CUA application itself notes that the project constitutes a change of use and includes new construction.

The San Francisco Administrative Code (Chapter 31, California Environmental Quality Act Procedures and Fees)<sup>1</sup> describes a substantial modification of a CEQA exempt project that requires reevaluation as either:

Section 31.08(i)(1)(A): *“A change in the project as described in the original application upon which the Environmental Review Officer based the exemption determination, or in the exemption determination posted on the Planning Department website at the time of issuance, which would constitute an expansion or intensification of the project... [which] includes, but is not limited to: (A) a change that would expand the building envelope or change the use that would require public notice under Planning Code Sections 311...”*

Section 31.08(i)(1) (B) *“New information or evidence of substantial importance presented to the Environmental Review Officer that was not known and could not have been known with the exercise of reasonable diligence at the time the Environmental Review Officer issued the exemption determination that shows the project no longer qualifies for the exemption.”*

Section 31.19(a) requires: *“After evaluation of a proposed project has been completed pursuant to this Chapter, a substantial modification of the project may require reevaluation of the proposed project.”*

Section 31.19(b) requires: *“When the Environmental Review Officer determines that a change in an exempt project is a substantial modification as defined in Section 31.08(i), the Environmental Review Officer shall make a new CEQA decision...”*

**Comment 1.A:** The CEQA Determination is based on an incomplete CUA application as discussed in Topic Sections 3 – 5 below. The project should not automatically qualify for a

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[http://library.amlegal.com/nxt/gateway.dll/California/administrative/chapter31californiaenvironmentalqualitya?f=templates\\$fn=altmain-nf.htm\\$q=\[field%20folio-destination-name:%27Chapter%2031%27\]\\$x=Advanced#JD\\_Chapter31](http://library.amlegal.com/nxt/gateway.dll/California/administrative/chapter31californiaenvironmentalqualitya?f=templates$fn=altmain-nf.htm$q=[field%20folio-destination-name:%27Chapter%2031%27]$x=Advanced#JD_Chapter31)

**Technical Comments of the Saint Ignatius Neighborhood Association  
on CUA application #2018-012648CUA**

CEQA exemption without further environmental evaluation. Refer also to the 2020 CEQA State Guidelines Section 15162<sup>2</sup>.

**Fact 1.B:** The CEQA Determination is flawed in several ways:

- a) The Determination did not include evaluation of the wireless facility portion of the project. The wireless facility is not an existing facility and constitutes a modification to the submitted stadium lighting CUA application, which provides only passing mention of the wireless facility and does not describe its impacts.
- b) The Determination fails to recognize the lighting project's proposed expanded uses. The transportation review in Step 2 of the CEQA Checklist states: *"The proposed addition of lights at the existing facility would not expand the use of such facility. Instead, the proposed lights would shift the existing use to later times in the day and/or days of the week."*
- c) The Determination fails to recognize the proposed change in use and new construction. The CEQA Determination Checklist Step 4 Item 1 - "Change of use and New Construction" box is not checked although the CUA application checked both of those boxes.
- d) The Determination does not include consideration of geology and soils and there is no evidence that a geotechnical report has been completed for the project.

**Comment 1.B:** The wireless facility modification to the application must be evaluated to determine whether it constitutes a substantial project modification.

While the school facility itself will not be expanded in terms of buildings or enrollment; the installation of stadium lights allows for new and expanded uses of the athletic field. The field will receive significantly more hours of use during completely new periods of time (night time on weekdays) which will result in significantly increased transportation-related pressures such as traffic and parking over more and longer periods of each day and week. The CEQA evaluation should consider these impacts.

Installation of the stadium lights including foundations, and the ground-based lease area for the wireless clearly constitute both new construction and a change in use. The CEQA evaluation should evaluate the impacts of these new facilities and related construction. The actual construction area on the ground will be small in relation to the school property, but the impact will be quite large since approximately 100,000 square feet of new area around the athletic field would be illuminated. This level of impact must be evaluated.

The CUA application states that geology and soils is not applicable, and it fails to document the area or volume of soil disturbance and excavation that would occur. The area of ground

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<sup>2</sup> [https://www.califaep.org/docs/2020\\_ceqa\\_book.pdf](https://www.califaep.org/docs/2020_ceqa_book.pdf)

**Technical Comments of the Saint Ignatius Neighborhood Association  
on CUA application #2018-012648CUA**

disturbance for the wireless lease area is 336 square feet, but no details are provided regarding the planned depth of that disturbance. Per the drawings from Verizon that were included in the announcement for the April 29, 2020 neighborhood hearing, the proposed stadium light poles appear to have a diameter of 3.5 feet and their footings would thus likely have a wider diameter. The CUA application states that the excavation for the poles will be 30 feet deep.

No further foundation details are provided but it is likely that the total amount of planned excavation exceeds the 50 cubic yard threshold that would trigger the requirement for preparing a geotechnical report. Given the scale of the proposed poles and their associated excavation, a formal Geotechnical Investigation should be conducted, and a Geotechnical Report should be prepared and included in the CEQA evaluation.

**Fact 1.C:** The 2020 CEQA State Guidelines Section 15300.2(c) Exceptions to Categorical Exemptions states: *“A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.”*

**Comment 1.C:** The installation of new 90-foot stadium light poles would be highly unusual, particularly in the context of the RH-1 District and 40-foot height restrictions. We believe that the height of such poles would create significant aesthetic impacts (see Figure 1 in Topic Section 3 below, and Appendix 1). The Determination does not consider the aesthetic impacts of the project in accordance with Section 21081.3 of the CEQA State Guidelines.

We are not aware of a pre-existing Environmental Impact Report (EIR) for the school or for this proposed project. The Department should require the applicant to provide a full environmental impact assessment and prepare an EIR for this project. Sufficient time should be allowed for public review and comment prior to any Commission review for the project. The report should include alternatives (e.g. project, no project, alternatives to accomplish the same goals as project). One option to explore is potential modification of the class schedule so that participants in games that would be played late in the day or evening could have physical education class in the last class period, enabling them to leave earlier for games.

The CUA application drawings do not include a site section drawn to scale showing the height and bulk of the poles, lights, and Verizon antennas, in relation to a typical neighboring home. Nor have story poles<sup>3</sup> been erected for the neighborhood and Planning staff to see the actual visual impact on the neighborhood character. The CUA application

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<sup>3</sup> Story poles provide a good representation of proposed construction to allow owners, users and neighbors the opportunity to visualize what the proposed design intent would be. If it is not realistic to put up 90-foot story poles, then balloons or some other visual element should be used to indicate the light standard heights to the public.

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drawings also do not include a dimensioned plan or elevation drawing of an actual proposed light pole (although the Verizon drawings do). No shadow study was provided, despite the fact that the poles themselves will cast shadows across the homes on 39<sup>th</sup> Avenue and Quintara Street and possibly farther.

Appendix 1 includes two cross-sectional scale drawings created by SINA. They illustrate that the height and bulk of the light poles are grossly out of scale to the neighborhood and are visible from sidewalks, front and rear yards and inside homes including those on 39<sup>th</sup> and 40<sup>th</sup> avenues. It should be noted that Verizon's plans which were used to create these scale drawings show the poles located farther from the property line than does the Saint Ignatius site plan (in the application's Musco lighting drawings). The Verizon and/or Saint Ignatius plan drawings should be revised to show the exact locations of the poles.

**Fact 1.D:** Potential cumulative effects of school facilities, operations, and activities over time have not been considered or evaluated under CEQA.

**Comment 1.D:** The school has received several Conditional Use Authorizations (CUA) and CEQA exemptions related to facility changes and expansions over the years, including the authorization for initial construction in 1966. While the original construction was approved under a CUA, that does not mean that every proposed change in use, new use, or new construction can or should also be approved under that CUA as "existing uses".

CEQA Guideline Section 15064(h)(1) requires that an EIR be prepared *"if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. 'Cumulatively considerable' means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."*

There is no evidence that an Environmental Impact Report was ever prepared, and to our knowledge, there is no publicly available Master Plan for any Planned Unit Development related to the school (although we have made a public records request for them, if they exist, see Appendix 2). The 2015 project description (Record #2015-014427PRV) states that the school had begun master planning at that time for future replacement of existing buildings, replacement of an indoor pool with a larger outdoor pool, and construction of a new theater/performing arts center at the existing practice field location. The proposed stadium lighting project must be considered within the context of both past and future planned incremental changes that have or will result in cumulative effects.

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**2. Saint Ignatius has not complied with the requirements or spirit of public disclosure and engagement.**

**Fact 2.A:** This project was originally proposed in 2015. A series of neighborhood meetings were held in 2015 and a project review meeting with Planning Department staff was held on November 18, 2015. There have been no substantive changes to the application since, however the project was suddenly reactivated in March of 2020. The most recent neighborhood meeting was scheduled for March 18, 2020 with a Planning Commission hearing to follow on March 23, 2020. SINA requested that Saint Ignatius provide a Chinese interpreter eight days in advance of the neighborhood meeting.

Both meetings were cancelled in response to the March 16, 2020 Shelter in Place Order which was most recently extended through May 31, 2020. As a result, the neighborhood meeting was rescheduled to April 29, 2020 and the Commission hearing is currently scheduled for May 14, 2020.

**Comment 2.A:** A project that has been in and out of the planning process for five years should not be rushed through now in the midst of the ongoing Shelter in Place Order that severely restricts the public's ability to participate in the process.

**Fact 2.B:** Because the Order precludes in-person participation, the April 29, 2020 neighborhood meeting was held via Zoom video conferencing/phone-in and was attended by over 100 neighbors. SINA had warned the school of the potential number of participants and again asked how Chinese speakers would be accommodated within that forum. No response was received from Saint Ignatius and no Chinese translation was made available; therefore, the Chinese speaking neighbors were effectively excluded from the meeting. The meeting consisted of verbal presentations with a few slides by the project proponents (Saint Ignatius, Ridge Communications representing Verizon, and Musco Lighting).

**Comment 2.B:** It was extremely difficult to find the weblink for the meeting on the Saint Ignatius website and SINA had to ask Saint Ignatius for it at the last minute on the afternoon of the meeting and then share it with interested stakeholders via email. We are aware that some of our neighbors do not have a good understanding of Zoom and struggled with signing in to it. The presentations were not accessible to those who only phoned in, and Chinese-speaking neighbors could not participate at all. We are concerned that the Commission hearing also may not allow for full public participation in these same ways.

**Fact 2.C:** SINA submitted written questions in advance of the neighborhood meeting, some directed toward Verizon and some toward Saint Ignatius. Other stakeholders submitted advance questions on the Saint Ignatius "Ask SI" webpage.



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At the meeting, the Verizon representative responded to their pre-submitted questions. The Saint Ignatius representative, Tom Murphy, partially answered one pre-submitted question but refused to answer the nine others and he refused to address any of the more than 175 questions and comments posted during the meeting via the Zoom chat function stating that they were unrelated to the project. All participants except the project proponents were muted for the duration of the meeting, which was scheduled for one hour but was ended abruptly by the meeting host, Tom Murphy, within 40 minutes. SINA resubmitted the ten Saint Ignatius questions with clarifications on how each directly relates to the project on April 30, 2020 (Appendix 3). SINA also requested a full transcript of the meeting including presentation slides. No response has been received to date.

**Comment 2.C:** There was plenty of time for Saint Ignatius to select and answer at least some questions during the meeting, but they did not. Therefore, full participation by even English-speaking stakeholders was denied.

Saint Ignatius did not provide a mechanism for participants to officially sign-in to the meeting nor were participants asked to provide the contact information required for a sign-in sheet to be submitted to the Department as part of the Pre-Application Meeting Packet to be filed with the Department. The Pre-Application submittal sign-in form that Saint Ignatius was supposed to use was not used and there was no other way provided to verify who participated in the meeting. The sign-in form also contains a box for people to check to request copies of project plans. Saint Ignatius did not point out that option at the meeting, so neighbors were not informed of their ability to request relevant plans.

In response to a SINA inquiry, the assigned planner stated in a May 4, 2020 email: *“The Department needs to receive and review the Project Sponsor’s full Pre-Application submittal before any comments can be provided on it”*. That may be true, but it raises the question of whether there is sufficient time for that submittal to be received and reviewed and can be made available for public review before the Commission hearing.

**Fact 2.D:** The California Public Records Act<sup>4</sup> provides for the right to inspect public records, and states: *“Public records are open to inspection at all times during the office hours of the state or local agency and every person has a right to inspect any public record...”*

**Comment 2.D:** The Shelter in Place Order and closure of Planning Department offices has precluded the public’s ability to inspect potentially important project-related documents not available on the Department’s Accela Citizen Access website.

For instance, there are no electronic records available for the original 1966 CUA for construction of the school (Record #CU66.005) so there is no available rationale for us to understand the Commission decision to grant the original Conditional Use Authorization.

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[https://leginfo.ca.gov/faces/codes\\_displayText.xhtml?division=7.&chapter=3.5.&lawCode=GOV&title=1.&article=1](https://leginfo.ca.gov/faces/codes_displayText.xhtml?division=7.&chapter=3.5.&lawCode=GOV&title=1.&article=1).

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For the 1989 school expansion project (Record #1989.477C), Commission Motion #12024 states: *“This Commission has reviewed and considered reports, studies, plans and other documents pertaining to this proposed project.”* This same language is used in Commission Motion #16770 for a 2003 CUA (Record #2003.1273C) that authorized the existing 40-foot lights at the school’s practice field. These statements imply that additional documents exist.

Planning Commission Motion #17115 (Record 2005.0451C) makes reference to a 1990 Planned Unit Development approval (in Motion #12024), implying under Planning Code Section 304, that a Master Plan for the school had been developed by that time. SINA submitted a formal records request via email on May 1, 2020 (Appendix 2) and we currently await receipt of the requested documents. We hope that copying fees non-electronic files will be waived in light of the COVID-19 crisis since we would have inspected relevant records in person at the Planning office if we could. These documents should be made available to allow sufficient time for public review before any Planning Commission determination is made on the current proposal.

**3. The proposed stadium lighting, with or without a wireless facility, is contrary to the Planning Code height and bulk district restrictions.**

**Fact 3.A:** Virtually all of the Sunset District is subject to a zoning height limit of 40 feet for accessory structures. Moreover, most of the area with the exception of scattered pockets, lies within Zoning District RH-1, Residential-House, One Family (Planning Code Section 209.1). Saint Ignatius school is located in a RH-1 District.

Code Section 253(b)(1) requires the Commission to: *“consider the expressed purposes of this Code, of the RH, RM, or RC Districts, and of the height and bulk districts, as well as the criteria stated in Section 303(c) of this Code and the objectives, policies and principles of the General Plan, and may permit a height of such building or structure up to but not exceeding the height limit prescribed by the height and bulk district in which the property is located.”*

Code Section 209.1 states: *“These [RH] Districts are intended to recognize, protect, conserve and enhance areas characterized by dwellings in the form of houses...”* The purposes of these Districts (Section 209(a)(5)) include: *“Promotion of balanced and convenient neighborhoods having appropriate public improvements and services, suitable nonresidential activities that are compatible with housing and meet the needs of residents, and other amenities that contribute to the livability of residential areas.”*

Code Section 304(d)(6) states: *“Under no circumstances [shall the proposed development] be excepted from any height limit established by Article 2.5 of this Code, unless such exception is explicitly authorized by the terms of this Code. In the absence of such an explicit authorization, exceptions from the provisions of this Code with respect to height shall be confined to minor*

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*deviations from the provisions for measurement of height in Sections 260 and 261 of this Code, and no such deviation shall depart from the purposes or intent of those sections.*

**Comment 3.A:** It is unclear how the Planning Department and Commission could even consider approving the installation of 90-foot tall poles whether for new stadium light poles or new wireless installations in this location as a CUA under Code Sections 209.1, 253(b)(1), and 304(d)(6).

The proposal should be re-filed as a variance application under Code Section 305 rather than as a CUA application. We believe that the project proponent has attempted to circumvent the stricter variance requirements by applying for a CUA rather than a variance. We also believe that a variance should not be granted for the same reasons that a CUA should not be granted at this time based on the current application, discussed in Topic Sections 4 and 5 below.

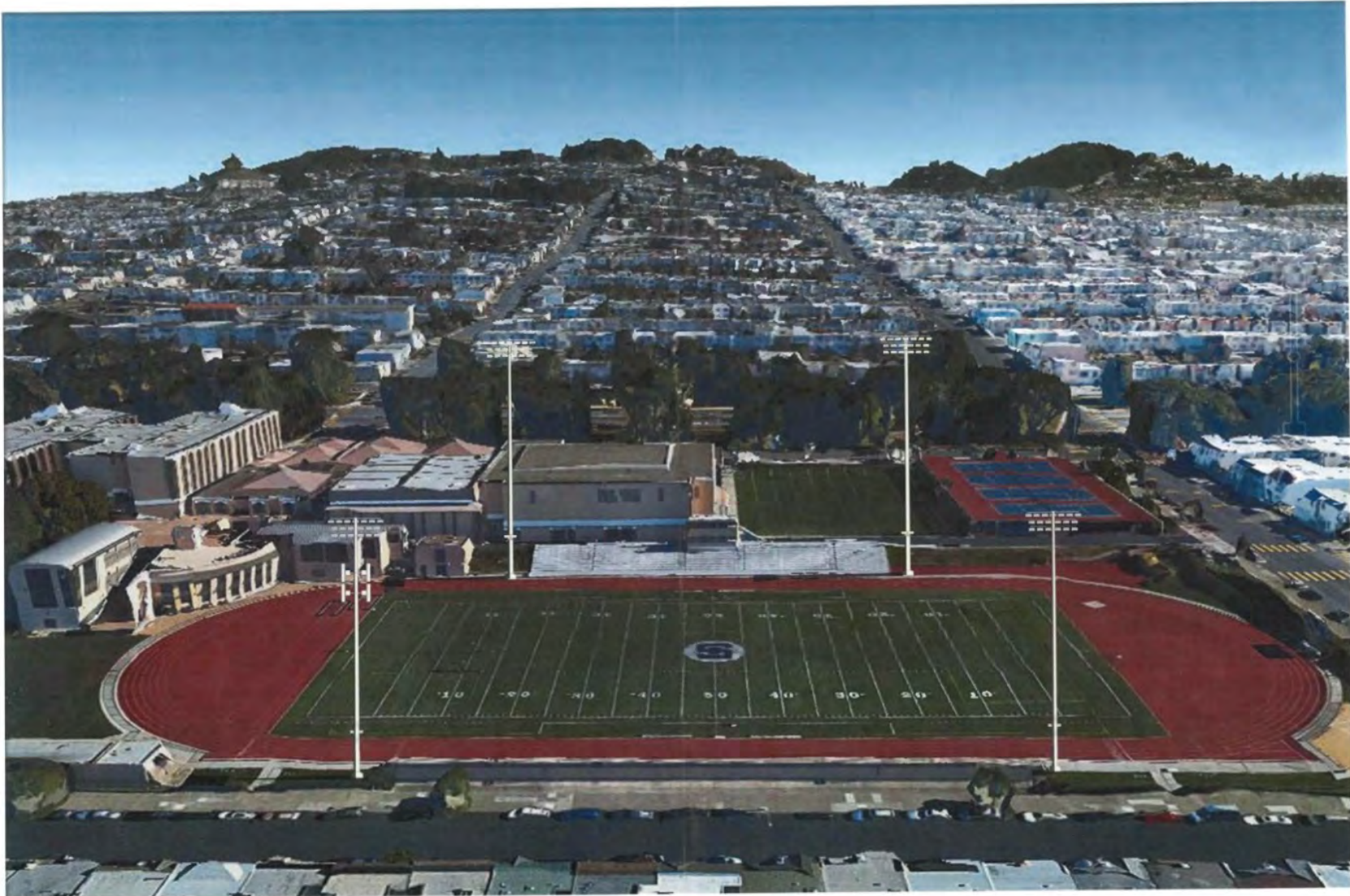
The project would clearly violate the 40-foot height restriction. It would not offer anything that “protects, conserves, or enhances” the District’s surrounding residential neighborhoods. The project would not meet any needs of local residents and would not contribute to overall livability. In fact, this project would have the exact opposite effect on the local neighborhoods (see further discussion in Topic Section 5). SINA requested in our re-submitted questions (Appendix 3) that Saint Ignatius provide information on the number or portion of students who live within the immediate surrounding neighborhoods so we could gauge the level of benefit to local students and their families, but this information has not been provided. The Commission should request a breakdown of student numbers by Neighborhood or District to determine how and to what extent the project proposes to benefit families and neighborhoods in the immediate vicinity.

A 90-foot tall pole is equivalent in height to a 9-story building. Figure 1 is a photographic rendition of the proposed 90-foot tall lights prepared by the project proponent in the 2015 project description. The view is uphill toward the East with Sunset Boulevard (at the strip of trees) shown just beyond the athletic field and school buildings. There are no other tall structures in that view, and likewise there are no other tall structures when viewing downhill from the school toward the ocean. Appendix 1 provides three photographic renditions and two scale drawings created by SINA that show different views which further illustrates the relationship of a 90-foot tall pole to surrounding buildings and structures.

The proposed 90-foot poles would be, by far, the tallest structures in this part of the City, and would constitute a significant blight on the landscape, particularly for the surrounding neighborhoods and City visitors having a direct view of them. The adverse visual impact would be continual and most apparent during daylight even when the lights are not in use. The poles are so tall relative to houses that they would be visible from both the front and rear yards of all homes in the immediate neighborhood and from much farther away as well.

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Figure 1: Photo rendition of 90-foot stadium lights [source: Saint Ignatius, 2015-014427PRV]



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**4. The proposed project constitutes a new and/or changed use under the Planning Code.**

**Fact 4.A:** Code Section 175(a) states: *“No application for a building permit or other permit or license, or for a permit of Occupancy, shall be approved by the Planning Department, and no permit or license shall be issued by any City department, which would authorize a new use, a change of use or maintenance of an existing use of any land or structure contrary to the provisions of this Code.”*

Code Section 311(b)(1)(A) includes the addition of wireless telecommunications facilities as a “change in use” in residential Districts, and Section 311(b)(3) requires a building permit application for new wireless facilities.

Code Section 311(c) states: *“Building Permit Application Review for Compliance. Upon acceptance of any application subject to this Section, the Planning Department shall review the proposed project for compliance with the Planning Code and any applicable design guidelines approved by the Planning Commission. Applications determined not to be in compliance with the standards of Articles 1.2, 1.5, 2 and 2.5 of the Planning Code, Residential Design Guidelines, including design guidelines for specific areas adopted by the Planning Commission, or with any applicable conditions of previous approvals regarding the project, shall be held until either the application is determined to be in compliance, is disapproved or a recommendation for cancellation is sent to the Department of Building Inspection.”*

**Comment 4.A.1:** Installation of new 5G wireless facilities on one or more new 90-foot poles constitutes a change of use, if not a significant new use. There is no building permit application or separate CUA application for the new wireless facility in the school’s electronic files on the Accela Citizen Access website. Nothing in the current stadium lighting CUA application addresses specifications or details of the wireless facility which is given only passing mention in that application. The only plans and details about the wireless installation were provided in the notice of the April 29, 2020 neighborhood meeting. To our knowledge the associated drawings are still not on the Accela website for the project. The plan drawings attached to that notice show the wireless installation at a height of 66 feet above ground level, which Verizon confirmed is the height needed. As noted in Fact 3.A and Comment 3.A above, this height still exceeds Code Section 2.05 height restrictions in RH-1 Districts.

An October 4, 2016 email from the Planning Department to SINA (in response to a SINA inquiry) stated that there would be separate applications submitted for the lighting installation and for the wireless installation. However, no separate application for the wireless facility has ever been submitted. It appears that the project proponent is attempting to circumvent applicable Planning Code provisions related to the proposed new

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wireless facility. The lighting project CUA application should be revised to include and describe all details of the new wireless facility; or a separate CUA or variance application should be submitted for the wireless facility. A building permit application for the wireless facility should also be submitted. We request that the Planning Commission exercise its discretionary review powers over the new wireless facility in accordance with Code Section 311(e) if, and when a building permit application is submitted for the wireless facility.

**Comment 4.A.2:** The installation of stadium lights is also, at a minimum, a change in use of the athletic field and noted as such in the CUA application. In reality, it is a significant new use since it involves installation of new 90-foot stadium light poles at a location where there is no permanent field lighting now and currently no night time use of the athletic field (see discussion of prior use of temporary lights in Fact and Comment 5.I below).

**5. The application is incomplete since it does not demonstrate compliance with numerous applicable provisions of the Planning Code.**

**Fact 5.A:** The 40-foot lights at the school's practice field were authorized in 2004 as a Conditional Use under Planning Commission Motion No. 16670, subject to the height limits specified in Code Section 253. That order also requires the lights to be turned off by 7:30 pm (Motion No. 16670, Exhibit A, Condition 3). The current athletic field stadium lighting proposal is also being reviewed under Conditional Use provisions of Planning Code Section 303.

Code Section 102 defines the term: *"Conditional Use allows the Planning Commission to consider uses or projects that may be necessary or desirable in a particular neighborhood, but which are not allowed as a matter of right within a particular zoning district."*

Under Code Section 303(c), the Planning Commission may authorize a Conditional Use *"if the facts presented are such to establish that..."*:

Section 303(c)(1): *"The proposed use or feature, at the size and intensity contemplated and at the proposed location, will provide a development that is necessary or desirable for, and compatible with, the neighborhood or the community..."*

Section 303(c)(1)(B): *"The proposed use will serve the neighborhood, in whole or in significant part and the nature of the use requires a larger size in order to function."*

In its statement of facts for Section 303(c)(1), the CUA application states: *"The project will enhance use of the football field for St. Ignatius students, the majority of whom live in San Francisco."* Other benefits specific to the school and students are listed in the statement. An email dated April 24, 2020 to SINA from Tom Murphy of Saint Ignatius confirmed: *"Our goal in lighting the field is to maximize the use for the SI Community."* Further, in a March 12, 2020



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informal meeting with SINA, Mr. Murphy stated the new lights are intended as “a marketing tool” to attract top student athletes since the school must compete for top talent<sup>5</sup>.

**Comment 5.A:** The project does not meet the applicable criteria of 303(c)(1). The stadium lighting will only benefit students and the school, which has operated successfully for many years without permanent field lighting. The football field is not available for public use and the proposal will not change that, so the proposed use will not serve the surrounding neighborhoods at all. Instead, it will have significant overflow impacts on the neighborhoods and will degrade the quality of life in them. We believe that very few students live in the Outer Sunset neighborhoods since most students arrive by car or public transit (see also Comment 3.A above).

The project is not necessary or desirable for the immediate neighborhoods especially given the height of the poles and the added intensity of use over many new night time games and practices during weekdays that would result (see additional discussion in Fact and Comment 5.H). The height of the poles is also not compatible with the neighborhood, nor are the poles in keeping with the height or scale of existing development within the surrounding residential neighborhoods (see Fact and Comment 5.E below).

**Fact 5.B:** The CUA application also suggests that the installation of emergency services antennas in conjunction with Verizon cellular antennas “enhances public safety and services”. A review of prior school permits and authorizations reveals as many as 40 pre-existing wireless facilities currently installed on school building roofs.

**Comment 5.B:** While new antennas for emergency services might provide a broader public safety benefit to the City and/or neighborhood, the application provides no information to support the idea that new or additional antennas are in fact necessary; nor that they can only be mounted on 90-foot tall poles installed for the separate purpose of lighting the athletic field.

**Fact 5.C:** Code Section 303(c)(2): “Such use or feature as proposed will not be detrimental to the health, safety, convenience or general welfare of persons residing or working in the vicinity, or injurious to property, improvements or potential development in the vicinity, with respect to aspects including but not limited to the following:” including Section 303(c)(2)(B) which states: “The accessibility and traffic patterns for persons and vehicles, the type and volume of such traffic..”

The CUA application statement of facts for Section 303(c)(2) states that the project will have “minimal effect on traffic” in that football games will be moved from Saturdays to Friday nights, reducing the traffic associated with the current Saturday school games that coincide with soccer games at the West Sunset Athletic Fields [located adjacent to the north side of the

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<sup>5</sup> SINA contemporaneous meeting notes, March 12, 2020.

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school between Ortega Street and Quintara Street]. The application also states that a traffic and parking study would be conducted.

In an October 20, 2015 document responding to objections raised by SINA at the two 2015 neighborhood meetings (Appendix 4), Saint Ignatius states that the project will benefit neighbors spreading traffic out over two days that would lessen impacts, suggesting: *“rather than 600 cars coming to the neighborhood on Saturday, for example, 200+ will come Friday night for a football game...and 400 cars will come Saturday for Rec and Park games and practice at West Sunset.”*

The response document also states that the school was *“looking into the viability of closing off 39<sup>th</sup> Avenue”* during the night games that attract larger crowds and/or making it one-way in front of the school; that they had taken various other steps to alleviate campus traffic and parking; and that they plan to add existing parking when building *“major structures on campus”* (see Fact and Comment 1.D above for more discussion of potential future campus plans).

**Comment 5.C:** At the April 29, 2020 neighborhood meeting, Saint Ignatius stated that the traffic and parking study had been completed. To date, that study is not part of the Accela public record and not available for public review, although SINA requested a copy from the school both before and after the meeting. Therefore, it is not possible to evaluate whether the effect is expected to be “minimal”. A traffic and parking study conducted by a qualified individual or firm must be made available for public review before a Commission determination can be made.

Whether there are 200, 400 or 600 additional cars at any one time is irrelevant. The proposal would increase the total number of hours and the number of occasions when many more cars are present during weeknights. Thus, the overall traffic and parking impacts would be significantly worse than under current school operations.

Other actions that the school stated in 2015 they may or may not take in the future to alleviate traffic and parking do not support the current proposal and are irrelevant unless concrete plans and/or City approvals are in place for such actions. If other such approvals are in the process of review or have been granted, the application should be revised to reflect those conditions.

In addition, double and triple parking of cars on residential streets and blocking of private driveways at any time is clearly detrimental to the health, safety, convenience and general welfare of neighbors. This is particularly true for residents with mobility limitations who would be required to park farther away from their homes. Double and triple parking impedes access of the Muni #48 bus and emergency response vehicles to the streets surrounding the school. Illegal parking also impedes residents’ ability to leave their homes which is especially important in the event of an emergency.



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**Fact 5.D:** Code Section 303(c)(2)(C): *“The safeguards afforded to prevent noxious or offensive emissions such as noise, glare, dust and odor.”*

**Comment 5.D:** The CUA application is incomplete since it does not address noxious or offensive emissions including light pollution, glare, noise, automobile emissions, and litter, among others (See Topic 6 for light pollution and glare discussion). These were concerns raised by SINA in the June 2015 comment letter and at the September 15, 2015 neighborhood meeting (Appendix 4). In addition to the continuing offensive emissions from school activities during the daytime from games and practices, this proposal would extend those emissions over more days and more hours each day.

The adverse impacts to neighbors from night time use of the athletic field have been experienced already through the school’s use of rented temporary field lighting used periodically over the last several years for night games and other events (see also Fact and Comment 5.I). Emissive impacts have included extreme noise, litter, public urination, disruption of quiet evenings including difficulty in holding conversations inside homes, difficulty for children to fall asleep, and light pollution.

Residents have reported that the noise from school games carries beyond 30th Avenue, nearly a mile away; and includes blaring loud-speakers used by game announcers, amplified recorded music, band music, loud cheering, car horns and air-horns related to game celebrations. These games typically lasted until well after 9 pm.

In addition, there are currently no permanent lights on the athletic field, so any new lighting will add significant light pollution load onto the immediate neighborhood and night sky, where there was previously none (see also Facts and Comments 5.E and 5.F, and Topic 6).

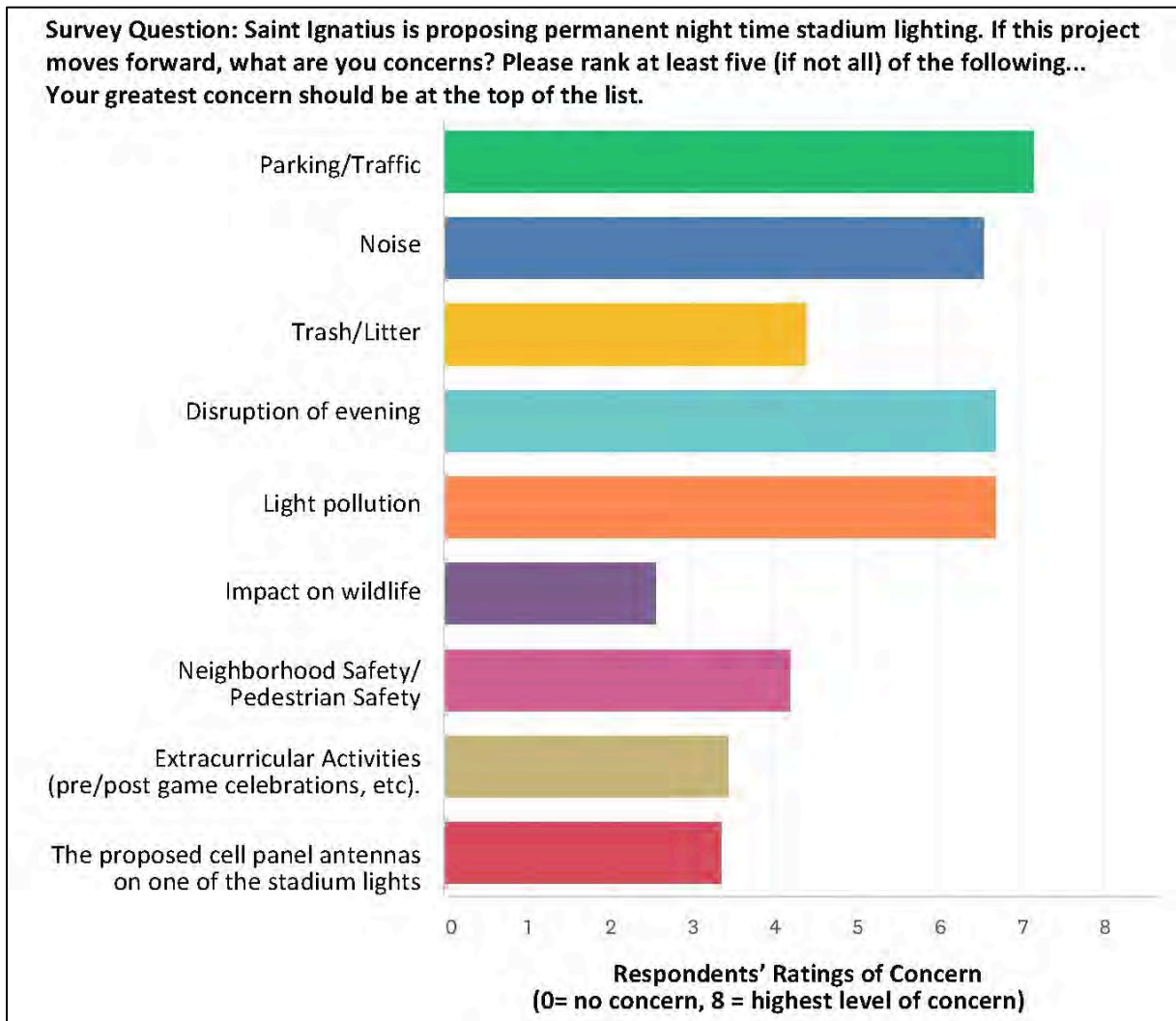
Respondents to an April 2020 online neighborhood survey (40% response rate) reported that these concerns still exist (Figure 2 below) and that night time use of the athletic field would only exacerbate the offensive emissions that occur during the daytime and when the athletic field has been rented out.

Materials provided at the September 15, 2015 neighborhood meeting (Appendix 4) discussed efforts the school had taken to reduce sound levels, and stated: *“We plan to involve an acoustical engineer if we move forward with the light project to see if we can somehow redirect the sound system.”* The application should be revised to specify the maximum noise level at the school fence lines that can be expected from all sources emanating from the project, including any noise related to the Verizon lease area (e.g., fans for battery cooling) and noise from night time games, practices and other events.

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The planned acoustical engineering evaluation and/or a more robust and valid sound study<sup>6</sup> should be conducted with consideration of the character of the community conditions in the absence of night games. Study results should be publicly shared prior to any Commission determination on this project.

**Figure 2: Neighborhood survey results, April 2020**



<sup>6</sup> A valid noise study should include, at a minimum, an estimate of sound increases during games, not daylong averages. It should describe differences in sound from current no-game conditions at 10 pm and with games and include differences over a three-hour game period since the sound level would vary during a game. The study should determine differing sources of noise and break down the volumes by source during game time (e.g. contributions from crowd noise, music, PA system, etc.). Impulse measurements should be made to identify the intensity of sound by duration and by source and consider ways that the volume could be diminished as needed. A sound map of the field and area should be developed based on topography and sound transmission characteristics (e.g. where does sound from the field travel and at what intensity levels would sound arrive at different properties in the area?)

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**Fact 5.E:** Code Section 303(c)(2)(A) states: “The nature of the proposed site, including its size and shape, and the proposed size, shape and arrangement of structures.”

**Comment 5.E.1:** As discussed above in Fact 5.A and Comment 5.A, 90-foot light poles would be enormous in relation to the scale of the surrounding residential neighborhoods, including upslope locations where the poles would rise into views of the ocean.

The poles would also cast shadows that extend across the surrounding neighborhoods (see Fact and Comment 1.C). Furthermore, the lights themselves will illuminate the entire 100,000 square foot football field where no lights currently exist. This will increase local light levels dramatically and will be glaringly apparent from surrounding streets and homes (see also Fact and Comment 5.F).

**Comment 5.E.2:** No foundation details are included with the application and should be required to ensure that potential impacts are understood and considered. Two of the 90-foot poles would be located immediately inside of the fence line on 39<sup>th</sup> Avenue within approximately 8 feet of the public sidewalk, within about 68 feet of the street edge of residential yards and driveways of homes on 39<sup>th</sup> Avenue, and within less than 90 feet of the homes themselves<sup>7</sup>. If a pole failed it could cause serious injury or even death as well as significant property damage on both school and non-school property. See also Fact and Comment 1.B for CEQA-related concerns about the foundations.

The pole specifications in the 2015 project description indicate that each one will weigh nearly 2 tons. The CUA application states that the foundations would be excavated to a depth of 30 feet to support pole height and weight. There have been numerous failures of stadium light poles across the country, including at least three across in 2019 alone. Two occurred in Arkansas and were likely caused by winds<sup>8, 9</sup> with one causing personal injuries; and in one case, structural integrity problems were identified, fortunately before any of the poles could fail. They had been installed only seven months earlier<sup>10</sup>. The CUA application plans do specify the pole wind and earthquake ratings, and we have to trust that they are correct for the location. But we are concerned that the application does not describe any measures to ensure that the poles will be inspected periodically to confirm that they remain structurally sound over their planned life.

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<sup>7</sup> Measured estimates from Google Earth.

<sup>8</sup> <https://www.5newsonline.com/article/news/local/outreach/back-to-school/light-pole-falls-at-gravette-high-school-football-stadium/527-23c21f43-6ecc-4e02-8225-a36decad006b>

<sup>9</sup> <https://www.dailymail.co.uk/news/article-6798019/Shocking-moment-light-pole-falls-high-winds-high-school-soccer-game.html>

<sup>10</sup> <https://romesentinel.com/stories/lighting-issues-at-sheveron-stadium,76585>

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**Fact 5.F:** Code Section 303(c)(2)(D) states: *“Treatment given, as appropriate, to such aspects as landscaping, screening, open spaces, parking and loading areas, service areas, lighting and signs...”*

The CUA application statement of facts for Section 303(c)(2) notes that the project will use energy efficient LED lights similar to those recently installed by the San Francisco Park & Recreation Department. The statement of facts for Section 303(c)(1) discussed above also states: *“The use of LED lighting will substantially reduce light spillage such that exists at South Sunset Athletic Fields [at 40th Avenue and Wawona Avenue] and Beach Chalet Soccer Fields [on John F. Kennedy Drive at the west end of Golden Gate Park] which use older technology lighting systems.”* At the April 29, 2020 neighborhood meeting, presenters reported that the Margaret Hayward Park [1016 Laguna Street] has the same technology as proposed for this project.

**Comment 5.F.1:** The energy efficiency of the lighting is not relevant to the overall proposal (but see Topic 6 below for related concerns). The fact that two other City-owned fields using older technology that may cause light spillage is also irrelevant to this proposal since both facilities are located well away from the neighborhoods that would be affected by this Saint Ignatius proposal. The fact that the City-owned Margaret Hayward Park may use LED technology is also irrelevant since those lights are not stadium lights and would not be anywhere close to 90 feet tall, and the park is located in an area of varying height Districts. That project is not yet complete, so it is not possible to visit and evaluate the LED technology *in situ*.

Furthermore, City-owned facilities provide significant public benefits including public recreational opportunities within their neighborhoods which this proposal does not.

**Comment 5.F.2:** LED lights are also not benign. According to a recent National Geographic article<sup>11</sup>, LED lights tend to be overused, often lack proper shielding, and result in over-illuminated areas. LEDs used in outdoor lighting emit wavelengths of blue light that *“bounce around in the atmosphere, potentially increasing sky glow. These wavelengths are also known to affect animals—including humans—more dramatically than lights emitting in other parts of the spectrum.”*

Fog increases the effects from such lights. In addition to light directly reflected from the ground, suspended water droplets from fog scatter the light and amplify sky glow. In heavier fog conditions, more water particles are present in the atmosphere to scatter the up-bound light, thus magnifying the overall effect. Sky glow can also dramatically affect migratory and resident birds. The school, and two of the proposed athletic field light poles

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<sup>11</sup> <https://www.nationalgeographic.com/science/2019/04/nights-are-getting-brighter-earth-paying-the-price-light-pollution-dark-skies/#close>

**Technical Comments of the Saint Ignatius Neighborhood Association  
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are located within 300 feet of a possible urban bird refuge<sup>12</sup> (see 2015-014427PRV) so great care should be taken to ensure that any school lighting does not adversely impact birds.

**Comment 5.F.3:** There are adverse health effects from LEDs and our concern extends to the students using the field as well as the neighbors and passers-by. The American Medical Association (AMA)<sup>13</sup> notes that *“High-intensity LED lighting designs emit a large amount of blue light that appears white to the naked eye and create worse nighttime glare than conventional lighting. Discomfort and disability from intense, blue-rich LED lighting can decrease visual acuity and safety, resulting in concerns and creating a road hazard.”*

Such lights can have adverse effects on circadian sleep rhythms including reduced sleep times, reduced sleep quality, excessive sleepiness, impaired daytime functioning, and obesity. The National Geographic article states: *“The connection between light and biology starts with photons striking our retinas, triggering signals that reach a knot of neurons...a crucial regulator of the brain’s pineal gland, which produces the hormone melatonin... Outdoor lights interfere with those circadian rhythms by stunting the normal ebb and flow of melatonin. Obesity is one consequence of light messing with our nighttime physiology, as it is likely linked to persistently low levels of leptin. Based on a number of studies, low melatonin levels and circadian disruption are also thought to play a role in heart disease, diabetes, depression, and cancer-particularly breast cancer, for which Stevens<sup>14</sup> says the data are particularly compelling.”*

The AMA guidance document<sup>15</sup> recommends using the lowest emission of blue light possible and proper shielding to minimize glare and reduce detrimental human health and environmental effects. While LED lights are designed to shine directionally, they *“paradoxically can lead to worse glare than conventional lighting.”* The guidance notes that *“In many localities where 4000K and higher lighting has been installed, community complaints of glare and a “prison atmosphere” by the high intensity blue-rich lighting are common.”*

The proposed stadium lights would include 21 lights per pole (19 placed between 82 and 89 feet off the ground, and two at 15 feet off the ground). Each light is specified at 5,700K (Kelvin, a measure of color temperature) according to the 2018 preliminary drawings. They would also be within the field of vision of residents and passersby and are much higher on the color spectrum than the AMA recommended maximum of 3,000K. The photo/computer renderings by Verde Design filed as part the CUA application are not real-life simulations

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<sup>12</sup> <https://sfplanning.org/sites/default/files/resources/2018-08/Urban%20Bird%20Refuge.pdf>

<sup>13</sup> <https://www.ama-assn.org/press-center/press-releases/ama-adopts-guidance-reduce-harm-high-intensity-street-lights>

<sup>14</sup> Richard Stevens, an epidemiologist at the University of Connecticut who has studied the links between light pollution and human health for decades.

<sup>15</sup> <https://www.ama-assn.org/sites/ama-assn.org/files/corp/media-browser/public/about-ama/councils/Council%20Reports/council-on-science-public-health/a16-csaph2.pdf>

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and cannot be verified. The only way to evaluate the impacts would be if a similar light fixture with the same specifications was created and tested, or if the applicant provides reference to another project with the same specifications for the lighting and pole height.

The AMA guidance also states: *“...the luminance level of unshielded LED lighting is sufficiently high to cause visual discomfort regardless of the position, as long as it is in the field of vision...It is well known that unshielded light sources cause pupillary constriction, leading to worse nighttime vision between lighting fixtures and causing a ‘veil of illuminance’ beyond the lighting fixture. This leads to worse vision than if the light never existed at all, defeating the purpose of the lighting fixture. Ideally LED lighting installations should be tested in real life scenarios with effects on visual acuity evaluated in order to ascertain the best designs for public safety.”*

From the application’s lighting photos depicting the field as it might look after dark, it appears that the lighting analysis only considers light shining directly onto the field and stadium areas. It does not consider secondary light glare or lighting that “splashes” upward from the direct light and thus spreads farther than the lighting report indicates.

A more robust lighting study<sup>16</sup> should be conducted with these considerations including the character of the community in the absence of night games. Study results should be publicly shared prior to any Commission determination on this project.

**Fact 5.G:** The CUA application does not adequately demonstrate compliance with San Francisco General Plan Policies including, among others, Policy 7.2 which states: *“Encourage the extension of needed health and educational services, but manage expansion to avoid or minimize disruption of adjacent residential uses”* and Policy 11.8 which states: *“Consider a neighborhood’s character when integrating new uses, and minimize disruption caused by expansion of institutions into residential areas.”*

**Comment 5.G:** As discussed above, the proposed project will cause several new disruptions to the adjacent residential uses and will expand use (traffic, parking, noise, light pollution) by increasing the amount and duration of these impacts on residential areas. The application should be revised to demonstrate more clearly how the project meets all applicable General Plan Policies including Policies 7.2 and 11.8. The Commission should consider all applicable General Plan Policies in its evaluation of the project.

**Fact 5.H:** The CUA application statement of facts for Section 303(c)(3) reports that the project would not have an effect on the San Francisco General Plan because night time field use would be limited to athletic practices and games; and that only five to eight Friday night football

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<sup>16</sup> A valid lighting study should include, at a minimum, analysis of secondary light (“splash”), a site mockup study utilizing the specified lights that can be validated, detailed rationale about why the lights need to be 5,700K and not 3,000K, how glare would be minimized, what shielding would be used, and to explain how the lights would not interfere with migrating or resident birds.

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games per year would draw a potentially large number of spectators, up to 1,500. The rest are said to not typically draw large crowds. However, the April 24, 2020 email to SINA from Tom Murphy of Saint Ignatius states: *“We do not have a set schedule as to the definitive number of nights the lights will be used as that will change year to year and will be widely available in advance.”*

The 2015 project description document states that Friday night football games would end by 10:00 pm and evening practices and other sporting competitions would end by 8:00 or 8:30 pm. The school provided a table in 2018 of anticipated field use (Figure 3) that shows 66 nights of games with lights on until 10:00 pm, including 12 night time football games that currently occur on Saturday during the day, and 68 other games with lights on until 9:00 pm. At the time, Saint Ignatius also planned to continue renting out their field for 75 additional nights until 10:00 pm although more recently they stated it would not be rented for night use. These games and events are apparently in addition to 150 practice evenings that would have lights on until 8:30 pm (see note \*\* in Figure 3). Unless temporary lights are used (see Fact and Comment 5.1 below) all games have ended at dusk. It can be assumed that all practices currently end at dusk too. This projected usage constitutes potentially a full year of disturbed nights in our neighborhood over potentially seven days of the week as listed in Figure 3.

**Comment 5.H:** The vastly increased number of days and hours of stadium lighting use is a clear change in use that will result in the significant adverse impacts on the neighborhood that are discussed throughout this document.

At a minimum, the CUA application should be revised to specify the maximum potential number of nights the lights will be used each year for games and for practices, and the specific days and times when the lights would be turned off for each. In addition, the application should be revised to clarify whether or not the athletic field would be rented out as it has been in the past. Details should also be specified including the maximum number of rental occasions per year, purposes of rentals (e.g., athletic games versus other events), hours of rental use for each event, the specific organizations allowed to use the field under rental agreements, and the specific times when the lights would be turned off after such events.

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**Figure 3. Projected athletic field uses and hours [source: Saint Ignatius, 2018]**

**Murphy Field Light Project  
Projected Field Use  
November 8, 2018**

<b>Sport / Activity</b>	<b>Total # Games / Practices ***</b>	<b>Maximum Attendance</b>	<b>Days of Week</b>	<b>Months of Year</b>	<b>Proposed Time</b>	<b>Change from current schedule</b>
Football Games*	12	500 - 1,500	Friday	August to December	3:30 to 10:00 p.m.	Saturday Day Games moved to Friday Night
Football Practice	**	75	Monday - Saturday	August to December	10:00 a.m. to 8:00 p.m.	
Lacrosse Games	40	250	Monday - Saturday	March to June	3:30 to 10:00 p.m.	games currently called at dusk
Lacrosse Practice	**	100		March to June	3:30 to 8:00 p.m.	
Field Hockey Games	14	250	Monday - Saturday	August to December	lights on until 10:00 p.m.	games currently called at dusk
Field Hockey Practice	**	100	Monday - Saturday	August to December	10:00 a.m. to 8:00 p.m.	
Soccer Games	60	250	Monday - Saturday	November to March	3:30 to 9:00 p.m.	games currently called at dusk
Soccer Practice	**	100	Monday - Saturday	November to March	3:30 to 8:00 p.m.	
Track & Field Meets	8	250	Monday - Saturday	February to May	3:00 to 9:00 p.m.	games currently called at dusk
Track & Field Practice	**	100	Monday - Saturday	February to May	3:00 to 8:00 p.m.	
Outside Rentals	75	500	Monday - Sunday	Year-round	until 10:00 p.m.	games currently called at dusk

\* A game may rescheduled to Saturday evening, due to weather, poor air quality, power outage, etc.

\*\* All practices for all sports will equate to approximately 150 nights per year of light usage with lights out by 8:30 p.m.

\*\*\* Portions of games are held during daylight hours



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**Fact 5.I:** The school has rented temporary field lights numerous times since 2012. The number of events increased dramatically from approximately twice per year, to numerous occasions between November 2019 and January 2020. There is no available electronic Planning Department record of any Temporary Use Authorization applications or approvals for those intermittent activities as required under Code Section 205.4(b), even if such temporary use was allowed. Code Section 205.4(b) limits temporary uses in RH Districts to hospitals, post-secondary educational institutions, and public facilities. There is no provision to authorize temporary uses on private property or at secondary educational institutions in RH Districts.

**Comment 5.Ia:** It would appear that the school has repeatedly violated the Planning Code many times by conducting night games with un-authorized temporary lighting.

**Comment 5.Ib:** What is the mechanism by which the school is held accountable for ongoing compliance with all applicable sections of the Planning Code and any approval for this project that might be granted by the Commission? Even with mitigation measures how would the City determine that the number and type of night uses is not exceeded, game attendance does not exceed projected maximum capacities, noise levels do not exceed permitted maximums for individual games, lights are turned off promptly, the school's student population remains stable as described in terms of currently permitted enrollment level and levels of participation in sports that use the fields, traffic and parking needs are met, and the field is not used by other groups? It is unreasonable to expect neighbors to act as enforcement officials and repeatedly file Code enforcement complaints as the only means of oversight of school activities related to this proposal.

## **6. The project does not appear to meet applicable CALGreen light pollution requirements.**

**Fact 6.A:** The California Green Building Standards (CALGreen) were revised in 2019 with an effective date of January 1, 2020<sup>17</sup>. The CUA application preliminary plan drawings were filed prior to that revision and list the applicable code as the 2016 version of CALGreen. Relevant sections of the Code are the Light Pollution provisions in Section 5.106.8. The project plans do not specify which Lighting Zone is applicable to the project and location, and the photometric images are of such low resolution that it is difficult to discern individual foot-candle readings at the school property line and at the faces of residential buildings.

**Comment 6.A:** A neighborhood architect has reviewed the application and has determined that the project is deficient. The applicant should revise the CUA application and drawings as needed to ensure compliance with the current standards. In addition, it is impossible to correctly evaluate the project photometrics for compliance with CALGreen if no Lighting

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<sup>17</sup> <https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen>

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Zone standard is referenced. The photometric drawings should be resubmitted to more clearly show foot-candle levels in critical locations such as the faces of homes on 39<sup>th</sup> Avenue.

**Fact 6.B:** CALGreen uses the LEED V.4<sup>18</sup> Sustainable Sites Credit 6 - Light Pollution Reduction as a method of calculating vertical illuminance maximums. Light limits are specified at the property line based on the applicable Lighting Zone.

**Comment 6.B:** While the photometrics are difficult to discern, they show exceedances in the recommended lighting limits at numerous points along the property line which is the defined “light boundary” along 39<sup>th</sup> Avenue, regardless of which Lighting Zone (LZ) is used as the applicable standard. The photometric images show many values higher than the 0.20 foot-candle limit for an LZ 3 (urban) zone. Even into the middle of the street, values are above 0.20 foot-candles for most of the street length. There would be worse light pollution if this area is considered an LZ 2 (suburban-rural) zone with a 0.10 foot-candle limit.

The CUA application plan drawings do not show the dimensional distance from the poles to the property line, but it appears that the two poles along 39<sup>th</sup> Avenue would be directly inside the school fence line which is directly next to the public sidewalk. Furthermore, the plans do not provide any information on uplighting and glare, both of which are restricted under CALGreen. The application and plan drawings should be revised to ensure that light pollution levels meet the CALGreen standards.

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<sup>18</sup> [https://www.usgbc.org/sites/default/files/LEED%20v4%20BDC\\_07.25.19\\_current.pdf](https://www.usgbc.org/sites/default/files/LEED%20v4%20BDC_07.25.19_current.pdf)

**Technical Comments of the Saint Ignatius Neighborhood Association  
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**List of Appendices**

**Appendix 1:** Photographic renditions and scale drawings showing relationship of 90-foot pole height to surrounding buildings and landscape

**Appendix 2:** SINA public records request filed May 1, 2020

**Appendix 3:** SINA questions resubmitted to Saint Ignatius on April 30, 2020

**Appendix 4:** 2015 neighborhood meeting materials

**Appendix 4.a:** June 2015 SINA letter to Saint Ignatius

**Appendix 4.b:** September 2015 neighborhood meeting handouts

**Appendix 4.c:** October 2015 Saint Ignatius responses to neighbor questions

## **APPENDIX 1**

### **PHOTOGRAPHIC RENDITIONS AND SCALE DRAWINGS SHOWING RELATIONSHIP OF 90-FOOT POLE HEIGHT TO SURROUNDING BUILDINGS AND LANDSCAPE**



Photo Rendition 1

SINGLE FAMILY RESIDENTIAL NEIGHBORHOOD, APPROX 20 FEET

TOP OF LIGHT 90 FT. APPROX 4.5X HEIGHT OF RESIDENCES.

TOP OF LIGHT 90 FEET. OVER 2X HEIGHT OF ADJ. SCHOOL BUILDING.

TOP OF BUILDING APPROX 40 FEET

TREES APPROX 40-50 FEET





# Photo Rendition 2

TREES APPROX 40-50 FEET

TOP OF BUILDING APPROX 40 FEET

TOP OF LIGHT 90 FEET. OVER 2X HEIGHT OF ADJ. SCHOOL BUILDING.

TOP OF LIGHT 90 FT. APPROX 4.5X HEIGHT OF RESIDENCES.

SINGLE FAMILY RESIDENTIAL NEIGHBORHOOD, APPROX 20 FEET

WIDTH OF FOOTBALL FIELD 160'

Google Earth

Image Landsat / Copernicus  
©2020 Google  
Data SIO, NOAA, U.S. Navy, NGA, GEBCO  
Data MBARI

100 ft





Photo Rendition 3

TOP OF LIGHT 90 FEET.  
OVER 2X HEIGHT OF  
ADJ. SCHOOL BUILDING.

TOP OF BUILDING  
APPROX 40 FEET

TREES APPROX 40-50  
FEET

TOP OF LIGHT  
APPROX 90 FT.  
APPROX 4.5X HEIGHT  
OF RESIDENCES

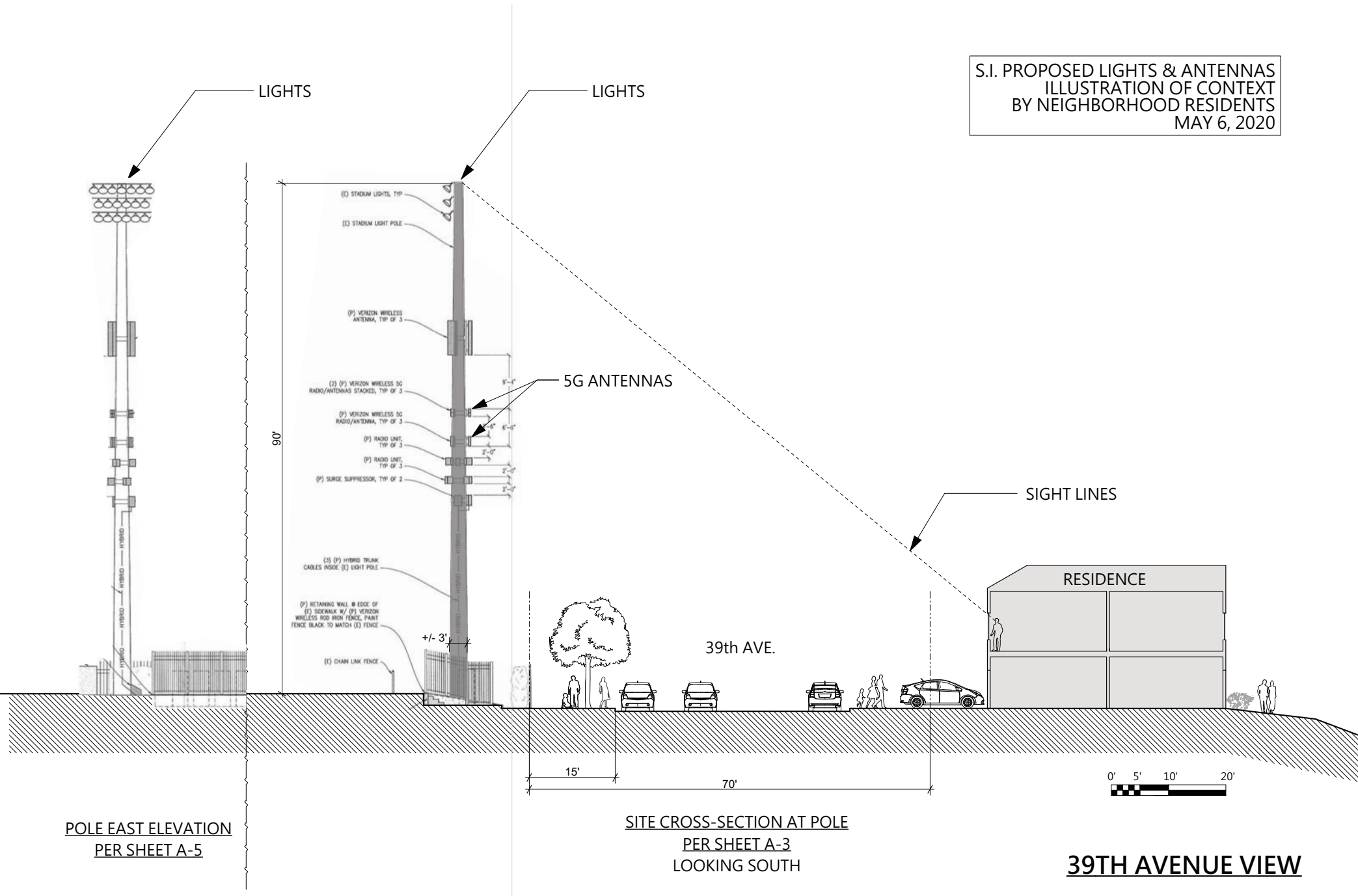
SINGLE FAMILY  
RESIDENTIAL  
NEIGHBORHOOD,  
APPROX 20 FEET



Google Earth  
Data LDEO-Columbia, NSF, NOAA  
©2020 Google  
Data SIG, NOAA, U.S. Navy, NGA, GEBCO  
Data CSUMB SFML, CA OPC

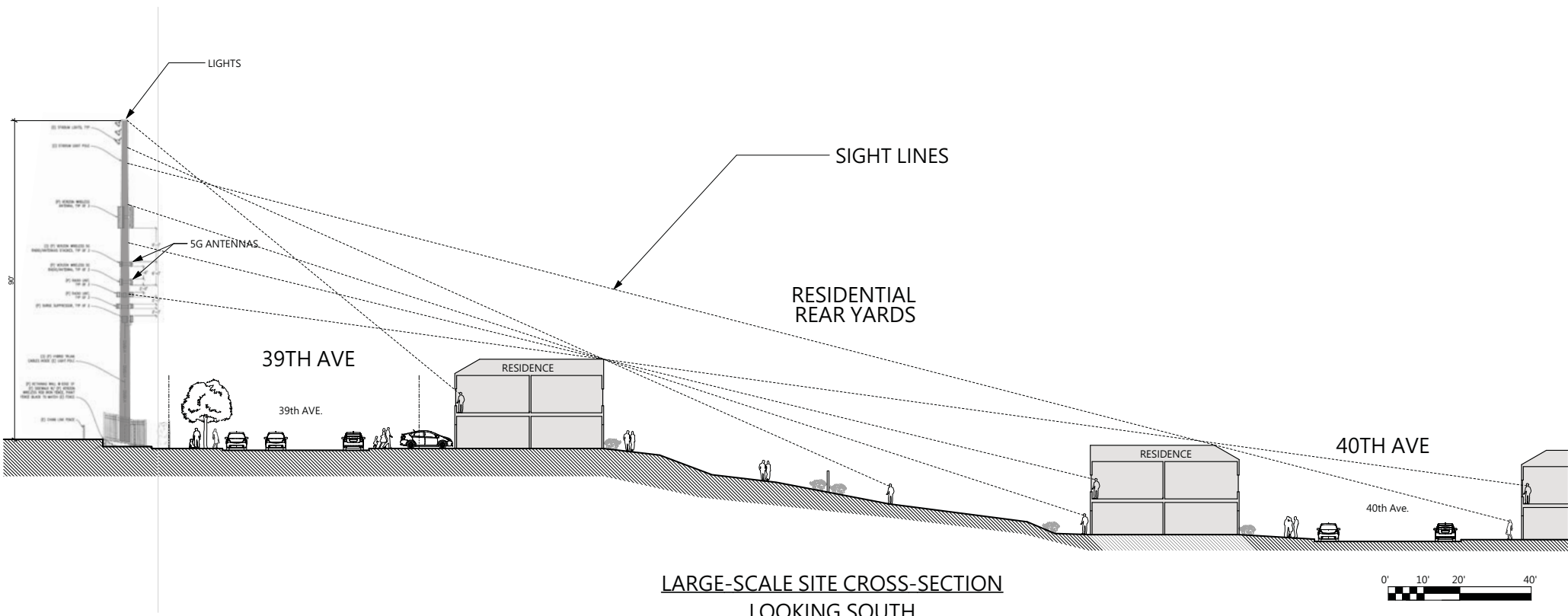
90 ft

S.I. PROPOSED LIGHTS & ANTENNAS  
 ILLUSTRATION OF CONTEXT  
 BY NEIGHBORHOOD RESIDENTS  
 MAY 6, 2020





S.I. PROPOSED LIGHTS & ANTENNAS  
ILLUSTRATION OF CONTEXT  
BY NEIGHBORHOOD RESIDENTS  
MAY 6, 2020



LARGE-SCALE SITE CROSS-SECTION  
LOOKING SOUTH  
W/ SIGHT LINES

39TH & 40TH AVENUE VIEW

**APPENDIX 2**

**SINA PUBLIC RECORDS REQUEST  
MAY 1, 2020**

The following documents were not found on the Accela webpage for the subject location and are being requested on May 1, 2020.

**Location:** Accessor Block: 2094, Lot No. 006

**Address:** 2001 37<sup>th</sup> Avenue

**Property Name:** Saint Ignatius College Preparatory

Please provide an advance estimate of fees for each numbered item and the timeframe in which we can expect to receive the documents.

- 1. Record CU66.005:**
  - a. The original CUA determination for school construction
  - b. The original CUA application and all associated background documentation and attachments to the application
- 2. CUA Application No. 89.477EC:**
  - a. The CUA application document and all attachments to the application
  - b. Transcripts or equivalent records from the September 13, 1990 Commission Hearing on the application referenced in Motion #12024
  - c. The CEQA determination document and the geotechnical and traffic studies cited therein
  - d. Any related Planned Unit Development documents including a Master Plan referenced in Motion #12024
- 3. CUA Application No. 2003.1273C:**
  - a. The application document including all attachments to it
  - b. Transcripts or equivalent records from the April 22, 2004 Commission Hearing on the application referenced in Motion #16770
- 4. The CEQA Exemption Determination document related to CUA Application No. 2003.1273C**
- 5. CUA Application No. 2005.0451C:**
  - a. The application document and all attachments to the application
  - b. Transcripts or equivalent records from the October 6, 2005 Commission Hearing on the application referenced in Motion #17115
- 6. Record 2018-012648CUA:**
  - a. All records, documents, plans, drawings and specifications related to the proposed Verizon wireless portion (not the lighting portion) of the project
- 7. Any and all Environmental Impact Reports related to the location – note that there may not be any EIRs.**

**Please refer questions and send documents to:**

Deborah Fischer-Brown, Secretary Saint Ignatius Neighborhood Association

415-566-6075

[sisunsetneighbors@hotmail.com](mailto:sisunsetneighbors@hotmail.com)

**If US mail must be used, please deliver documents to:**

Deborah Fischer-Brown

2151 39<sup>th</sup> Ave

San Francisco, CA 94116

**From:** [sisunset neighbors](mailto:sisunsetneighbors)  
**To:** [mfischer@lowimpacthydro.org](mailto:mfischer@lowimpacthydro.org)  
**Subject:** Fw: Public Requests Request - Accessor Block: 2094, Lot No. 006  
**Date:** Friday, May 1, 2020 5:22:28 PM

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FYI No Action

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**From:** CPC-RecordRequest <CPC-RecordRequest@sfgov.org>  
**Sent:** Friday, May 1, 2020 2:13 PM  
**To:** sisunset neighbors <sisunsetneighbors@hotmail.com>; CPC-RecordRequest <CPC-RecordRequest@sfgov.org>  
**Cc:** Horn, Jeffrey (CPC) <jeffrey.horn@sfgov.org>  
**Subject:** RE: Public Requests Request - Accessor Block: 2094, Lot No. 006

Deborah,  
We received your record request dated May 1, 2020.

You requested records for the property at 2001 37<sup>th</sup> Avenue. We will endeavor to complete your request on or before May 11, 2020 (Cal. Govt Code 6253(c) and Admin Code 67.21(b)).

**Thank you,**  
**Chan Son**  
**Records Requests**  
San Francisco Planning Department  
1650 Mission Street, Suite 400 San Francisco, CA 94103  
Main: 415.575.6926 | [www.sfplanning.org](http://www.sfplanning.org)  
[San Francisco Property Information Map](#)

The Planning Department is open for business during the Shelter in Place Order. Most of our staff are working from home and we're [available by e-mail](#). Our [Public Portal](#), where you can file new applications, and our [Property Information Map](#) are available 24/7. The Planning and Historic Preservation Commissions are convening remotely and [the public is encouraged to participate](#). The Board of Appeals, Board of Supervisors, and Planning Commission are [accepting appeals](#) via e-mail despite office closures. All of our in-person services at 1650 and 1660 Mission Street are suspended until further notice. [Click here for more information.](#)

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**From:** sisunset neighbors <sisunsetneighbors@hotmail.com>  
**Sent:** Friday, May 01, 2020 11:02 AM  
**To:** CPC-RecordRequest <CPC-RecordRequest@sfgov.org>  
**Cc:** Horn, Jeffrey (CPC) <jeffrey.horn@sfgov.org>  
**Subject:** Public Requests Request - Accessor Block: 2094, Lot No. 006

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

We would like to request certain Planning Department documents related to Saint Ignatius College Preparatory. Please see the attached list of documents being requested. While you may have sent individual documents previously, we want to be sure we have all relevant/complete documentation.

Location: Accessor Block: 2094, Lot No. 006 Address: 2001 37<sup>th</sup> Avenue.

We prefer to receive these documents in electronic format if possible, but understand that only paper copies may be available for some. Please provide an advance estimate of processing/copying fees for each numbered item separately, and the timeframe expected to retrieve and send the documents to us.

Email: [sisunsetneighbors@hotmail.com](mailto:sisunsetneighbors@hotmail.com)

If US mail must be used, please deliver documents to:

Deborah Fischer-Brown  
Secretary, Saint Ignatius Neighborhood Association  
2151 39<sup>th</sup> Ave  
San Francisco, CA 94116

Please acknowledge that you are in receipt of this request at 11:00 AM on May 1, 2020

Thank you for your prompt attention to this request.

Deborah Fischer-Brown  
Secretary, Saint Ignatius Neighborhood Association  
415-566-6075  
[sisunsetneighbors@hotmail.com](mailto:sisunsetneighbors@hotmail.com)

**APPENDIX 3**

**SINA QUESTIONS RESUBMITTED TO SAINT IGNATIUS  
APRIL 30, 2020**

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**From:** sisunset neighbors  
**Sent:** Thursday, April 30, 2020 11:16 AM  
**To:** Thomas Murphy <[tmurphy@siprep.org](mailto:tmurphy@siprep.org)>  
**Cc:** Mr. Ken Stupi <[kstupi@siprep.org](mailto:kstupi@siprep.org)>; Chad Christie <[chad.christie@ridgecommunicate.com](mailto:chad.christie@ridgecommunicate.com)>  
**Subject:** Clarification: Neighbor Questions

### **Saint Ignatius Key Questions posed by the SI Neighborhood Association**

**Originally submitted via email on 04/28/2020, resubmitted via email on 04/30/2020 with the clarifications below.**

At the 04/29/2020 SI Neighborhood Meeting, Mr. Tom Murphy refused to answer 10 specific questions. These questions were submitted in advance of the meeting via email by the SI Neighborhood Association. Mr. Murphy stated that many questions submitted were not related to the stadium lighting project.

Below we provide clarification on the purpose of each question in relation to the project. We believe they are legitimate questions that should have been addressed at the meeting. But, acting in good faith, we are willing to give SI another opportunity to provide responses to the questions below.

**We would appreciate your prompt response by noon Monday May 4, 2020 (one week after initial submittal of these questions).** None of these questions require lengthy research and should be easy to answer.

Saint Ignatius Questions:

8) We aren't aware of any other San Francisco high school (public or private) that has night time lighting, and yet they have thriving sports programs and are able schedule their sporting events during natural day time light. Why is it necessary for Saint Ignatius to have stadium lighting for night time sports?

**While this question was partially answered by listing all the various sports programs at SI, it still did not fully address the question above. This question relates to the project since SI claims the project is necessary for the school. If that is true, why is night time lighting not also necessary for other schools in the city? What makes SI so unique in this regard? If SI is aware of other schools in the city that also have night time lighting, such information would be helpful for us to know and might alleviate some of the neighbor's concerns.**

9) Why are you pushing this project ahead during the Covid19 virus crisis? You will not be able to have any organized sports for the foreseeable future.

**This question relates to the project since it appears to be being rushed through the permitting process even while the school is closed for the year. It is also being rushed during a time when the public cannot fully participate, as evidenced by the 04/29 meeting in which SI disallowed interaction with stakeholders and virtually no questions were answered.**

10) How many nights a year will the lighted field be in use? Your 2018 proposal said 154 nights a year. What is the current number?

**This question directly relates to the project as these impacts must be considered under the Conditional Use section of the planning code, and the project application does not include this information.**

11) When you had night games with temporary lights in the past -- we experienced extreme noise levels: sports announcers shouting over loud speakers, cheering, and recorded music blaring over loud speakers. How do you plan to control SI noise levels?

**This question directly relates to the project as noise impacts must be considered under the Conditional Use section of the planning code, and the project application does not include this information.**

12) We also experienced pre & post game partying/drinking, litter in our yards, and double parking. How will you ensure this is not a regular occurrence when there are night events?

**This question directly relates to the project as these impacts must be considered under the Conditional Use section of the planning code, and other than a mention that traffic impacts would be minimal, the project application does not include this information.**

13) Please provide the number of total S.I. students -- and a breakdown on where your students originate from. Specifically, how many of your students are from the Sunset District, Richmond District, elsewhere in San Francisco, and from other counties in the Bay area --Marin, etc.

**This question directly relates to the project since the project application states that the majority of students live in San Francisco, implying there is some public benefit from the project. It is important to know what portion of students live in the immediate neighborhoods around the school (e.g., those that could walk to school) in order to show any such potential benefit to the families in the local neighborhoods.**



14) In your response to comments at the 2016 neighborhood meeting, you said you would involve an acoustical engineer if you move forward with the stadium light project. This study would address sound concerns related to amplified announcements, music, etc. Has this study been done? If not, why not? If so please share results of these acoustical studies conducted to the association address: [sisunsetneighbors@hotmail.com](mailto:sisunsetneighbors@hotmail.com)

**This question directly relates to the project since noise was raised as a concern and would be exacerbated by more hours of field use. SI stated in the Q&A materials provided for the 2016 neighborhood meeting (Station 3, response #8) that the school planned to “involve an acoustical engineer if we move forward with the light project to see if we can somehow redirect the sound system.” We are simply asking whether or not you fulfilled your commitment to this matter and if so, any actions the school takes to redirect the sound system might alleviate some of the neighbor’s concerns.**

15) Did S.I. ever conduct the transportation/parking study mentioned in your Planning application? If so, could you provide a copy to [sisunsetneighbors@hotmail.com](mailto:sisunsetneighbors@hotmail.com)

**This question directly relates to the project since traffic and parking have been raised as concerns and both would be exacerbated by more hours of field use. The project application states: “we are obtaining a traffic and parking study” and the project “has minimal effect on traffic and parking”. We are simply asking whether or not you fulfilled your commitment to this matter and if so, that might alleviate some of the neighbor’s concerns. However, without public review of the study there is no basis upon which to state a minimal effect nor to alleviate these concerns. Mr. Murphy said at the 04/29 meeting that SI would post the study on your good neighbor site. We are also requesting a copy via email to us so that the report can be reviewed before the planning commission hearing.**

16) Has a CEQA Environmental Impact Report ever been prepared for the school property? If not, why?

**This question directly relates to the project and is a simple yes or no question. Among other things, CEQA requires analysis of cumulative effects. If an EIR was developed for the school at any time in the past, or associated with the current project, it would provide important context for understanding the project within the many other changes and expansions the school has undertaken in the past and may undertake in the future.**

17) Our association's architectural/engineering consultants would like to see the pole foundation design drawings and associated geotechnical report. [sisunsetneighbors@hotmail.com](mailto:sisunsetneighbors@hotmail.com) If a geotechnical report is, or was not prepared, please explain why not.

**This question directly relates to the project since the application states that the pole foundations would be 30 feet deep, yet no other information about them is provided. Foundation design and a geotechnical report are fundamental to ensuring that the pole structures will be stable, engineered correctly, and safe. Two of the poles are to be located directly along the 39<sup>th</sup> Avenue fence line. Each pole weighs nearly 2 tons per the application materials. If a pole failed it could cause serious injury or even death as well as significant property damage outside of the school property.**

Thank you  
Saint Ignatius Neighborhood

**APPENDIX 4.a**

**2015 NEIGHBORHOOD MEETING MATERIALS**

**JUNE 2015 SINA LETTER TO SAINT IGNATIUS**

June 29, 2015

Open Letter to SI from your neighbors.

First of all, **Thank You** for hosting the neighbor meeting a few weeks ago. It was very good of you to share your plans with the neighbors surrounding SI.

I think you now fully realize your neighbors concern with your proposed night games on your athletic field. We have experienced your night games (with temporary lights) several times over the past few years and therefore, can speak from experience.

We understand that the proposed lights will be low impact LED -- but it is not so much the lights in and of themselves, but rather the larger issue of **outdoor night activities at SI.**

This will reiterate our concerns:

**Noise:** Your neighbors have adapted to SI sports noise from sunup to sundown - from practices that start as early as 7 AM with coaches on megaphones, loud afternoon music blaring from the announcers box, to the actual games themselves -- with speakers set so loud that we can hear the announcers right through our closed windows. With the advent of night practices and games, this noise will destroy any hope of quiet evenings -- we will be unable to have a quiet dinner conversation with family or friends, watch TV, listen to our own music or attempt early bedtimes for our children.

**Parking:** Your neighbors are now accustomed to no available street parking and sometimes blocked driveways during school hours and daytime sports activities. But to extend this parking situation into our evenings is beyond neighborly. We will be unable to find parking upon returning from work or have parking available for friends visiting.

We have experienced the noise after the night games (with temporary lights). Cars roaring away with celebratory honking and cheering in front of our homes - well after the game ended. Not to mention the trash, empty bottles, and public urination.

**Non-SI events:** We understand that you garner income via leasing your sports field to third party events (as you do now). With the advent of a lighted field, we are very concerned that non-SI events combined with your own sports events will, after time and despite any promises, creep up to usage of the lighted field six or seven nights a week.

**Good Neighbor Program:** Most of us enjoy having SI as our neighbor. We have no issues with your school, your students or your activities as they are now -- during the day and late afternoon...you are indeed good neighbors. We just don't want SI activities to infiltrate into our homes at night as well.

**APPENDIX 4.b**

**2015 NEIGHBORHOOD MEETING MATERIALS**

**SEPTEMBER 2015 NEIGHBORHOOD MEETING HANDOUTS**



ST. IGNATIUS COLLEGE PREPARATORY  
2001 37th Avenue  
San Francisco, Calif. 94116  
(415) 731-7500  
www.siprep.org

Dear Neighbor,

St. Ignatius College Preparatory is holding a neighborhood meeting Sept. 15 at 7 p.m. in the Carlin Commons (the large building just to the north of the flagpole at 2001 37th Avenue).

We invite you to attend so that we can hear what you have to say and for you to learn more about our plans.

This is the second in our series of meetings. At our first meeting in June, we spoke about long-term construction plans, which include our desire to build field lights with cell towers, a new theatre and a new center for STEM (science, technology, engineering and math) courses. We hope to proceed with these plans by listening to your concerns and responding to them as best we can.

The neighbors who attended that meeting gave us lots of helpful feedback on challenges they have encountered on a regular basis. We have already put some policies and procedures in place based upon that feedback. We hope to do more going forward to share updates to our plans and remedies we have implemented. We hope to establish a dialogue and regular communication so that we can solve problems as they arise and keep you apprised about any changes.

Here's the agenda for the night:

- 7-7:10 Welcome & overview
- 7:10 – 7:25 Station 1 rotation (new construction & lights) (station 5 in handouts)
- 7:25 – 7:40 Station 2 rotation (parking, litter, student behavior)
- 7:40 – 7:55 Station 3 rotation (noise)
- 7:55 – 8:10 Station 4 rotation (congestion and speeding)
- 8:10 – 8:30 Q&A & Closing remarks

Enclosed you will find a summary of phone numbers, email addresses and our website — information you'll need if problems arise. Please keep this information handy; if you lose it, just go to [www.siprep.org/goodneighbor](http://www.siprep.org/goodneighbor) where you'll find the same information.

We know we won't solve all problems overnight, but we want to grow in our ability to be good neighbors. As a small step in that direction, we will make available a pass that will let you in at no cost to any home league game (except the Bruce-Mahoney football game at Kezar Stadium). If you can't come Sept. 15 but still would like a pass, send an email to [ptotah@siprep.org](mailto:ptotah@siprep.org) with your address and Paul will mail a pass to you.

Please come for coffee and cookies and a conversation with myself and the members of our school administration who will be present.

Thanks, and we look forward to seeing you.

Rev. Edwin B. Harris, S.J.

*Edwin B. Harris J*  
President, St. Ignatius College Preparatory



## **STATION 2. Parking in Driveways & Double Parking (Marybeth McFarland & Bill Gotch)**

### **Q. What plans do we have in place to teach students about parking etiquette?**

1. We addressed this at all of the student convocations in August & we reiterated this in an email in September. We also spoke to students in groups of 20 to reiterate parking etiquette and passed out permits so that we can better track down students who park in driveways.
2. That email contained links to an SFMTA site illustrating proper parking definitions.
3. We briefed our security staff to be vigilant in the neighborhood, and we are now including 39th Avenue and Rivera Street in our routine patrols.
4. SI security will be present in the neighborhood at key times.
5. Students will create a video (with some drone footage) demonstrating correct traffic & parking etiquette. We will show this on SITV during school and make it available online for future reference.
6. SI Live will create skits to further educate students on parking etiquette
7. On campus TV monitors will also educate students on what constitutes proper parking.
8. We have a biweekly parent newsletter and plan to publish tips and tricks to educate parents so that they can remind their student (and themselves) about proper parking.
9. We are a school whose business is education. We will drive these points home in the classroom and through co-curriculars to help our students, who, like all of us, make mistakes from time to time.
10. We will issue detention to students who are repeat offenders. For serious offenses, we can escalate to suspend or expel students. You are always free to call to have vehicles towed, though our students appreciate you calling us first.
11. Residents can always apply to the city to have their curbs painted red, though the city charges \$366 for this service.

### **Q. What specifically will happen when someone calls in to report a car blocking a driveway?**

1. Call our Director of Security at 415-419-4599. Marybeth McFarland (a veteran of the National Park Service law enforcement operations) will call the deans, who will locate students involved, pull them out of class, and have them move their cars immediately. Last year, this occurred a dozen times. Thus far this semester, we have had students move two cars. Time from first call to car being moved ranges between 15 and 30 minutes.
2. Once students move cars from blocked driveways, they report to the deans who issue detention.
3. We are using [Nextdoor.com](http://Nextdoor.com) and our Good Neighbor Program mailings to ask neighbors to look for the SI parking sticker to help us move cars quickly out of any driveways.

### **Q. Is there any plan to increase parking or reduce the number of cars kids drive to school?**

1. Current state laws do not allow students to carpool until they are 18 years old.
2. SI encourages carpooling and public transportation. We contract with CYO to provide bus transportation from Marin and San Mateo counties for 140 students, and many of our families choose to carpool or ride BART and/or MUNI. Some even use Uber.
3. At this point, we don't plan to build more parking structures, though we do hope to create more parking on 37th avenue between Pacheco and Rivera Streets by making this section one-way and having cars park on a diagonal. This would add 60 additional space (approximately) to the area in front of our school. We have begun discussions with the city to expedite these changes.
4. For evening events or for high capacity events, we can (if available) rent parking at A.P. Giannini School. (We have secured parking there already for the Nov. 7 & 8 fashion shows.)
5. We will continue to encourage the carpooling by using the 311 car-sharing option.
6. We have many students who use car ride services, such as Uber, Lyft and Shuddle.
7. We invite our neighbors to help us think of other solutions. We're curious about the possibility of having street cleaning happen from 3-5 p.m. around the area rather than 9-11 and 1-3 to create more space on the Sunset Blvd. side of 36th Avenue where there is no option to block driveways. We would not pursue this without neighborhood support, and we welcome your ideas to help lessen this problem.

### **Q. How many parking spots are we gaining or losing from the new McGucken Hall project?**

1. Uncertain at this point. At the very least, number of parking spots will stay constant, but we hope to add more parking. We are capped by our permit at 1,500 students and we have no plans to increase enrollment past current numbers (around 1,470 students).



### **STATION 3. Noise (John, Rob & Lakeeja)**

#### **Q. What will we do regarding volume level of announcers and music?**

1. Given neighborhood concerns, we are no longer allowing music with lyrics, as some neighbors complained that some lyrics were in poor taste. We are also allowing music before games only for 45 minutes for approximately 30 games. No music will be played earlier than 11 a.m., and for evening games, music will play from 6:15 to 7 p.m. and no later. Music will adhere to SI's decibel limit.
2. For the Posey and Kaepernick camps during the summer, music will start no earlier than 11 a.m. and will adhere to SI's decibel limit.
3. There are six speakers on JB Murphy field. We will use all for our football games; however, for any outside rentals, we are turning off the 3 speakers on the west side, as those are directly heard by residents on 39th avenue. We have also capped the sound output for all speakers at half maximum to reduce noise spillover to all neighbors.
4. We have measured decibel levels of events to insure that sound isn't excessive as compared to noise levels typical of other parts of the Sunset District. On the second day of the ProCamps event with Colin Kaepernick, our director of security measured the sound on 39th Avenue and Rivera Streets. The average was 37 decibels (equivalent to bird song). The maximum sound was 80 (equivalent to a car wash from 20 feet away), though this peak only happened when a MUNI bus and car traffic were present).
5. For the 2015-16 academic year and for the following summer, we have rented our field for six Sundays: four football games for the West Bay Rams and two ProCamps. We are turning away all others who request field rentals for Sunday events. For the West Bay Rams, we are not allowing our PA system to be used for announcements or for music. For all others uses (our own lacrosse practice on Saturday, for example), the PA will not go on until 10 a.m. and will be turned off by 6 p.m.
6. No coaches are allowed to use whistles on Saturdays earlier than 8 a.m. and on Sundays no earlier than 10 a.m.
7. Campus security will monitor noise levels during routine neighborhood patrols to ensure compliance with the above.
8. We plan to involve an acoustical engineer if we move forward with the light project to see if we can somehow redirect the sound system.
9. For each event on the field, someone from SI is in charge. Call campus security at 415-624-4285, and we will respond to any specific complaints or concerns as quickly as possible.

#### **Q. How will the West Sunset closure change things?**

1. It will be instructive to see what percentage of noise and congestion problems are reduced, as we know that issues of congestion, noise, parking, etc. are endemic to the area and caused by a variety of factors.



#### **STATION 4. Congestion & Speeding (Paul Totah & Michelle Levine)**

##### **Q. What is SI doing to mitigate issues concerning congestion and speeding?**

1. Our Campus Security Director created a handout with traffic and parking plan information, directed at parents. This was distributed at the start of school. When parents don't follow these procedures, they are handed by campus security the information to remind them to follow correct procedures. Information will be handed out again throughout the first quarter (at senior, junior and sophomore parent nights).
2. For weekend rentals, we require outside parties to park only in the SI garage or on 37th Avenue and to avoid parking in neighborhoods. While we know this is difficult to enforce, we do know that this message is going out and we are having our security monitor parking for these events.
3. We have partnered with Rec & Park and teams that use West Sunset. Our approach needs to be comprehensive, involving all the partners and players, regarding parking, speeding and congestion.

##### **Q. What have we done to mitigate speeding issues?**

1. We have requested SFPD radar enforcement starting the week of Sept. 1; this will continue through the fall. If necessary, we'll ask them to return in the winter. We thank Supervisor Katy Tang for her help in this regard and throughout this process.
2. We addressed this at all student convocations.
3. The speed/radar trailer will be positioned on Rivera, 39th, and Quintara from 39th to 40th, at different times. (One week per location.)
4. We have briefed our security staff to be vigilant in the neighborhood.
5. Our school administration, including Principal Ruff, will be present in the neighborhood.
6. Requests for speed bumps in front of homes (traffic calming) need to come from residents. In collaboration with the neighbors on 36<sup>th</sup> and 39<sup>th</sup> Avenues, we will advocate for speed bumps, and we will request speed bumps in front of SI. Neighbors on 36th and 39th Avenues submitted Traffic Calming Requests in collaboration with St. Ignatius prior to the July 31st deadline. We continue to encourage and support other neighbors to submit Traffic Calming Requests by the next City deadline, and we are able to assist neighbors organize and process requests to City Hall.

##### **Q. What have we instituted at SI during the school day for pick up & drop off?**

1. Congestion is often caused by drivers waiting at the light at Sunset Boulevard before making a turn. We submitted an application through SFMTA to add "no left turn" and "no U Turn" between the blocks of Pacheco and Rivera on 37th Avenue.
2. We have applied for a white zone to assist with drop off and have a security presence in front of school to help with congestion. Since 2014, we now have an official white zone lane on 37th Avenue from the library to the north to the end of the pool. There is also a bus zone by the tennis courts. Parking is available at the white zone between 9:30 a.m. and 2:30 p.m. though not in the bus zone. This helps people doing business with SI and our public lap swim program.
3. SFPD was present at the start of the year to assist new families with the drop off routine.

##### **Q. Are we committed to renting out our facility at the same level? Less? More?**

1. We want to rent out our facility in a way that allows us to be good neighbors. This summer we hosted a memorial gathering for a family that lost their son. They have strong Sunset roots and they looked for a space to accommodate the gathering (500 people). We will let Cornerstone Baptist Church use our facility on September 13 as "home base" during their neighborhood clean up event.
2. We also rent our facilities to sport camps and intramural organizations. We recognize that this can be more than an inconvenience to our neighbors (regarding noise and congestion) and we have adjusted our policies. (See Noise topic for more on this.)



## **STATION 5. Lights (Ken Stupi & Jamey Schmidt & a representative from Verizon)**

### **History**

Verizon Wireless has approached us for the past several years about installing cell towers in conjunction with lights on our football field. We currently have T-Mobile and AT&T cell antennae on the roof of our main campus building, but the location is disruptive to school operations and we will be discontinuing our leases when they come up for renewal in 1 to 2 years. Cell tower revenue is not a necessity for the project and is not a driving force; however, it is nice to have the revenue to offset costs. As discussed below, cell towers on our football field is an optimal site as cell providers can gain access without impacting school operations. We will not allow any company to have generators or toxic materials located at our site.

### **Rationale**

Back in 1970, we had boys' football, soccer and track; now we have 17 field sports for both boys' and girls' teams. We need more time to share a limited space. Students lose valuable class time as a result of travel to offsite fields. Also, competition for student athletes and coaches has dramatically increased. The addition of lights will make practice times more complementary to adult schedules and allow for increased practice times for student athletes. Finally, school spirit will increase with more "event" type night games. Attendance at games has decreased over the years as other sports and activities have garnered attention. Night games will be limited in number and will allow us to market them as special events.

### **Advantages to Neighbors**

Having cell antennas on tall poles reduces the need for telephone pole cell antennas. If we have one large antenna, it will reduce the need for multiple small antennae in the neighborhood.

Why move the cell antennas to the towers from our roof?

- i. Limited disruption to students
- ii. Ease of access for cell tower maintenance
- iii. Less cost / ease of construction
- iv. Potential future changes to southeast corner of field
- v. Smaller equipment pad footprint

**Q. What is the permitting process for the lights and the cell towers, and how will neighbors be allowed to comment?**

1. The city planning department will determine the permitting process. The first step of the process is for SI to meet with city planners in a project review meeting to determine how the planning department would like to approach the project. No matter what approach the planning department takes for permitting the project, there will be opportunities for public input on the project.

**Q. How many night games will we have during the year and what time will lights go out?**

1. Approximately 20 games will have lights on until 10 p.m. (lights out at 10 p.m.). Five of these are football games, and the others won't draw large crowds; another 120 practices and games will have lights on until 8 p.m. (lights out at 8 p.m.).
2. Athletics personnel are responsible for shutting off lights on time.
3. We currently have lights on the upper field. We have a policy for lights to be turned off at 7:30 p.m. at the latest for that field. We will adhere to this deadline.
4. After games, campus security will patrol around the stadium and call SFPD if needed.
5. SFPD will also be asked to assist with traffic control after games.

**Q. What will the 90 foot towers look like with cell equipment placed on them? And why do they have to be 90 feet tall?**

1. 90 feet is the optimal height to adequately light the field while providing almost no spillover of light onto surrounding houses. Please look at the light spillover schematic at the lighting table. The light poles can be shorter but this will likely lead to greater light spillover. Note that the lights at South Sunset and Beach Chalet are 70 feet tall.
2. Imagine a kicker punting a ball. It can soar 40-60 feet in the air easily. If towers were 60 feet tall, they would have to have light beam out at a 90-degree angle to illuminate the ball. Lights placed at 90 feet can angle down to illuminate anything at the 60-foot level. While the height of the tower may be an issue, we feel having the light point down is better for neighbors than lights pointing straight out.
3. See illustration for how the lights would look. Only one light pole needs to have cellular equipment mounted to it; however, at a future date, we may add cellular equipment to a second pole.

**Q. Are their cell towers in the neighborhood?**

1. Yes, there are two on the roof of St. Ignatius and there are antennas located in various locations in the neighborhood such as on the telephone pole pictured at 45<sup>th</sup> Avenue and Kirkham Street.



**Q. How do these lights differ from the ones we used in the past?**

1. These are state-of-the-art LED lights that light the field efficiently with hardly any illumination beyond the stadium. Take a look at the chart to see just how little light will spill over onto 39th avenue.
2. The lights will be focused down at the field, not out at the neighborhood
3. LED lights have less impact on birds and other wildlife.

**Q. What advantages are there for the neighbors to hold night games on Fridays?**

1. Our hope is that Friday night games will alleviate parking and congestion issues on Saturdays. On many Saturdays, we have events at J.B. Murphy Field while soccer and other teams gather at West Sunset. Having more playing time available will, we hope, reduce congestion on Saturdays in the neighborhood.
2. While many neighbors are concerned about the lights, some may want to attend a Friday night football game, an opportunity we are making available to you at no cost.

**Q. Just how dangerous are cell towers?**

From [www.cancer.org](http://www.cancer.org) (the American Cancer Society)

1. Some people have expressed concern that living, working, or going to school near a cell phone tower might increase the risk of cancer or other health problems. At this time, there is very little evidence to support this idea. In theory, there are some important points that would argue against cellular phone towers being able to cause cancer.
2. First, the energy level of radiofrequency (RF) waves is relatively low, especially when compared with the types of radiation that are known to increase cancer risk, such as gamma rays, x-rays, and ultraviolet (UV) light. The energy of RF waves given off by cell phone towers is not enough to break chemical bonds in DNA molecules, which is how these stronger forms of radiation may lead to cancer.
3. A second issue has to do with wavelength. RF waves have long wavelengths, which can only be concentrated to about an inch or two in size. This makes it unlikely that the energy from RF waves could be concentrated enough to affect individual cells in the body.
4. Third, even if RF waves were somehow able to affect cells in the body at higher doses, the level of RF waves present at ground level is very low -- well below the recommended limits. Levels of energy from RF waves near cell phone towers are not significantly different from the background levels of RF radiation in urban areas from other sources, such as radio and television broadcast stations.
5. For these reasons, most scientists agree that cell phone antennas or towers are unlikely to cause cancer.

**Q. Will the lights affect the resident bird population or migrating birds?**

1. We have been in contact with the Audubon society and asked for their input on this matter. We have also spoken with SF Rec & Park about this and they have no documented bird deaths with their lighting systems.

**Q. Will light reflect on the Field Turf back into the night sky?**

1. We don't expect this to be a problem as LED lights do not have the reflective and glare issues of older technology lights. Imagine light shining on a piece of plastic from 90 feet above. Then imagine that light bouncing up at the brightly lit area directly above the field (five feet up). We doubt any additive effect will occur anywhere close to the height of the stadium. We have contacted the lighting engineer who did this study for Beach Chalet and asked for his input on the project.

**Q. Why don't you put lights on your Pacifica Fields and use them for football games?**

1. Fairmont Field in Pacifica is located directly over the San Andreas fault. We lease the field and are not allowed to build any structures there. In addition, there is no running water or permanent bathroom at the facility.

**APPENDIX 4.c**

**2015 NEIGHBORHOOD MEETING MATERIALS**

**OCTOBER 2015 SAINT IGNATIUS RESPONSES TO NEIGHBOR QUESTIONS**



Here are the objections raised by neighbors and our responses to them:

- 1. The lights will be visible from nearby homes at night, disturbing neighbors and keeping children from sleeping.**
  - a. These are state-of-the-art LED lights that light the field efficiently with hardly any illumination beyond the stadium. Take a look at the chart to see just how little light will spill over onto 39th avenue.
  - b. The lights will be focused down at the field, not out at the neighborhood
  - c. LED lights have less impact on birds and other wildlife than older generation lights.
  - d. We have engaged a lighting engineer recommended by the City of San Francisco to perform a light study, the same engineer who did the work at the Beach Chalet soccer fields. We will share the lighting study with all interested parties.
  
- 2. Lights on the field means the school day, with all its noise, parking, congestion and litter, will be extended, disrupting the lives of the neighbors when they return from work.**
  - a. SI is working to lessen the burden of parking on the neighbors on two fronts. First, we have asked Rec & Park to open the parking lot on West Sunset to our students when the construction to the site is completed. We are asking for the neighborhood's help with getting this accomplished. Secondly, we are applying to change parking on the north side of Rivera between 37<sup>th</sup> and 39<sup>th</sup> Avenues from parallel to diagonal parking. We hope both efforts will reduce the incidence of students or parents double-parking or parking in driveways.
  - b. We continue to work with students to be good neighbors, especially concerning litter and noise. We have instituted a reporting mechanism available through our website, and our director of security is part of several neighborhood organizations to work to mitigate these issues.
  - c. SI encourages carpooling and public transportation. We contract with CYO to provide bus transportation from Marin and San Mateo counties for 140 students, and many of our families choose to carpool or ride BART and/or MUNI. Some even use Uber.
  - d. We have just instituted a van pick-up from BART to SI in order to further alleviate issues surrounding traffic & parking.
  - e. We plan to add existing parking when we build major structures on campus.
  - f. Approximately 35 events each year – both games and practices combined – will involve lights. Five of these events will be football games. These five are the only games that draw crowds larger than 100 spectators. The others simply don't attract viewers other than parents of students. We are looking into the viability of closing off 39<sup>th</sup> avenue during the five night games that attract larger crowds.
  - g. For all games, lights will be off by the athletics office by 10 p.m. at the latest and most likely earlier,
  - h. For all practices, lights will be off by the athletics office by 8 p.m. at the latest and most likely earlier .
  - i. Ultimately, we believe that adding lights to our field will benefit neighbors in two ways. First, rather than drawing two sets of commuters to the area for games at SI & West Sunset, we will spread this out over two days, lessening the impact on neighbors. (For example, rather than 600 cars coming to the neighborhood on Saturday, for example, 200+ will come Friday night for a football game at SI five times per year and 400 cars will come Saturday for Rec & Park games and practice at West Sunset. Due to the sharp cutoff of light, our lighting engineer has recommended that lights be added to shine on 39<sup>th</sup> avenue to improve safety immediately after extended games.
  - j. The second advantage to lights is in case of emergencies. If our field were needed for a staging area after an earthquake, we would have lighting in place to assist emergency personnel.



3. **Lights on the field means that SI will rent the field out to groups who will also bring traffic, noise & light pollution to the neighborhood after regular school hours.**
  - a. We have significantly cut back rentals. We will not rent our facility for night use.
4. **The height of the towers will obstruct views and be unsightly.**
  - a. 90 feet is the optimal height to adequately light the field while providing almost no spillover of light onto surrounding houses. Please look at the light spillover schematic at the lighting table. The light poles can be shorter but this will likely lead to greater light spillover. Note that the lights at South Sunset and Beach Chalet are 70 feet tall.
  - b. Only one light pole needs to have cellular equipment mounted to it; however, at a future date, we may add cellular equipment to a second pole.
  - c. The antennas atop our light poles are less obtrusive than the antennas mounted on existing telephone poles.
5. **Some people have expressed concern that living, working, or going to school near a cell phone tower might increase the risk of cancer or other health problems.**
  - a. At this time, there is very little evidence to support this idea. In theory, there are some important points that would argue against cellular phone towers being able to cause cancer.
  - b. First, the energy level of radiofrequency (RF) waves is relatively low, especially when compared with the types of radiation that are known to increase cancer risk, such as gamma rays, x-rays, and ultraviolet (UV) light. The energy of RF waves given off by cell phone towers is not enough to break chemical bonds in DNA molecules, which is how these stronger forms of radiation may lead to cancer.
  - c. A second issue has to do with wavelength. RF waves have long wavelengths, which can only be concentrated to about an inch or two in size. This makes it unlikely that the energy from RF waves could be concentrated enough to affect individual cells in the body.
  - d. Third, even if RF waves were somehow able to affect cells in the body at higher doses, the level of RF waves present at ground level is very low – well below the recommended limits. Levels of energy from RF waves near cell phone towers are not significantly different from the background levels of RF radiation in urban areas from other sources, such as radio and television broadcast stations.
  - e. For these reasons, most scientists agree that cell phone antennas or towers are unlikely to cause cancer.
  - f. See item 4.c. as the use of antennas on the light poles reduces the need for antennas at telephone pole level.
6. **Some neighbors wonder why the school needs the lights at all, given the long history of the school functioning without the lights.**
  - a. Students can use JB Murphy Field only on daylight hours; this impacts the rest of their day and defines just when they can practice and play, especially in the winter months when the sun sets earlier than the rest of the year. The same is not true anywhere else on campus (with the exception of the tennis courts). Students can practice and perform dance, drama, orchestra and choir well into the evening, freeing up their time after school for collaborative work on class projects and other co-curricular activities. The primary mission of the school is the education of our students and lights will permit us to have fewer early dismissals in which students miss class time.
  - b. It is important, too, to keep as many of the students at the main campus as possible. This is true for theatre, music and sports. While we have alternative fields, the goal is to utilize this campus as a headquarters, with academics followed by afterschool co-curriculars, including athletics and performing arts. Having students on campus aligns with our priorities.