



ST. IGNATIUS COLLEGE PREPARATORY

EDUCATE. INSPIRE. LAUNCH.

Dear President Yee and Members of the Board of Supervisors,

This letter addresses two appeals of approvals the San Francisco Planning Commission granted to Saint Ignatius College Preparatory for the installation of lights on the school's athletic field, known as Murphy Field. First, we will give you some background about the school and why this project is so important for our students. Second, we will address the concerns raised in the appeal of the conditional use permit. Finally, we will address the issues raised in the CEQA appeal.

About Our School

St. Ignatius College Preparatory is 165 years old and has been at its present location in the Sunset District for half a century. Our school has approximately 1,550 students which includes our new, full scholarship middle school for underserved San Franciscans. Like San Francisco, our school is diverse. Over fifty percent of our students identify as people of color. About thirty percent of our students receive financial assistance. Over fourteen percent of our students live in the Sunset District and 945, or over sixty percent, live in San Francisco.

In 2016 the school started the Fr. Sauer Academy, a full-scholarship middle school for 75 scholars, all of whom qualify for SNAP and most of whom live in the east side of San Francisco.



The Academy prepares scholars for St. Ignatius where they will attend high school on full scholarship.

We believe strongly in the value of athletics for building character, developing leadership abilities and the value of working as a team, solidifying bonds among students, and providing a healthy outlet for teenage energy. Over 1,000 students participate on one or more athletics teams. Girls and boys take part in 15 sports, 26 athletic programs and 66 athletic teams. In addition to the high school, The Fr. Sauer Academy middle school hosts five sports and 13 athletic teams.

Why Do We Need Lights?

Some neighbors, organized under the name of SINA, fundamentally question the school's need for the lights. We need them because the students need them. Since the school's current campus opened over 50 years ago, school sports have greatly expanded. That is particularly true at St. Ignatius where, after the school became co-ed in 1989, participation in girls' sports has grown by leaps and bounds. In 1969 we had 1,100 students and nine sports. Today we have over 1,500 students and 79 athletic teams.

Murphy Field is currently used Monday through Sunday on an annual basis for approximately 110 games/meets (including pre-season), up to 20 playoff games, and 750 practices. Trying to



pack this usage into daylight hours has proved all but impossible and has necessitated early morning practices starting at 6:00 a.m. Studies show that students should still be sleeping during these early morning hours in order to maximize their physical and mental health and their learning experience in school. Exacerbating this situation is increasing competition from other San Francisco schools for off-campus field space. Night games and practices are not intended to intensify the use of Murphy Field, but rather to make the use more manageable and better for our students. This is the key fact that SINA either does not understand or simply chooses to ignore.

The Project

The project before you is simple: the school hopes to erect four, slender, 90-foot-tall light standards situated around Murphy Field at approximately the 10-yard line. Additional safety lighting will be added for the bleachers and sidewalk surrounding the field. The addition of the lights will allow for weekday and weekend early evening use of the field for practice, games and events. As approved by the Planning Commission, the school will dim the lights no later than 8:30 and turn them off no later than 9:00 p.m. Monday through Friday nights during the school year. The only exception to this schedule is that the school is permitted to leave the lights on until 10:00 p.m. only up to a maximum of 20 evenings per year, but we anticipate having the need arise fewer than ten times per year. The school cannot use the lights more than 150 nights per year.



On the proposed northwest standard, Verizon Wireless is seeking to install and operate a wireless communications facility. Verizon has provided the Board of Supervisors with a separate communication addressing issues relating to their project.

The project does not involve enlargement of the field or expansion of its seating capacity.

The Conditional Use Permit

The Planning Commission voted 6-1 to grant the school's application for a conditional use permit, stating as follows:

The Project is, on balance, consistent with the Objectives and Policies of the General Plan. An addition of light standards and evening use of the sports field is not expected to adversely increase or impact traffic and parking in the neighborhood. The Project maintains and expands an educational and recreational use, which are uses that support families and children in San Francisco. The WTS facility is generally desirable and compatible with the surrounding neighborhood.

...

SINA and its supporters have made it clear that they are not looking for compromise – they insist that no lights be permitted on the field whatsoever. Thus, arguments that the SINA believes the project should be studied further are, frankly, disingenuous. No matter how much analysis is done, SINA will oppose our project.

We believe SINA's opposition to the project is based on fundamental misconceptions about the nature of the lights and the intended use of the field, and we believe many of our neighbors have unfortunately been misled by SINA's alarmist (and demonstrably false) statements.

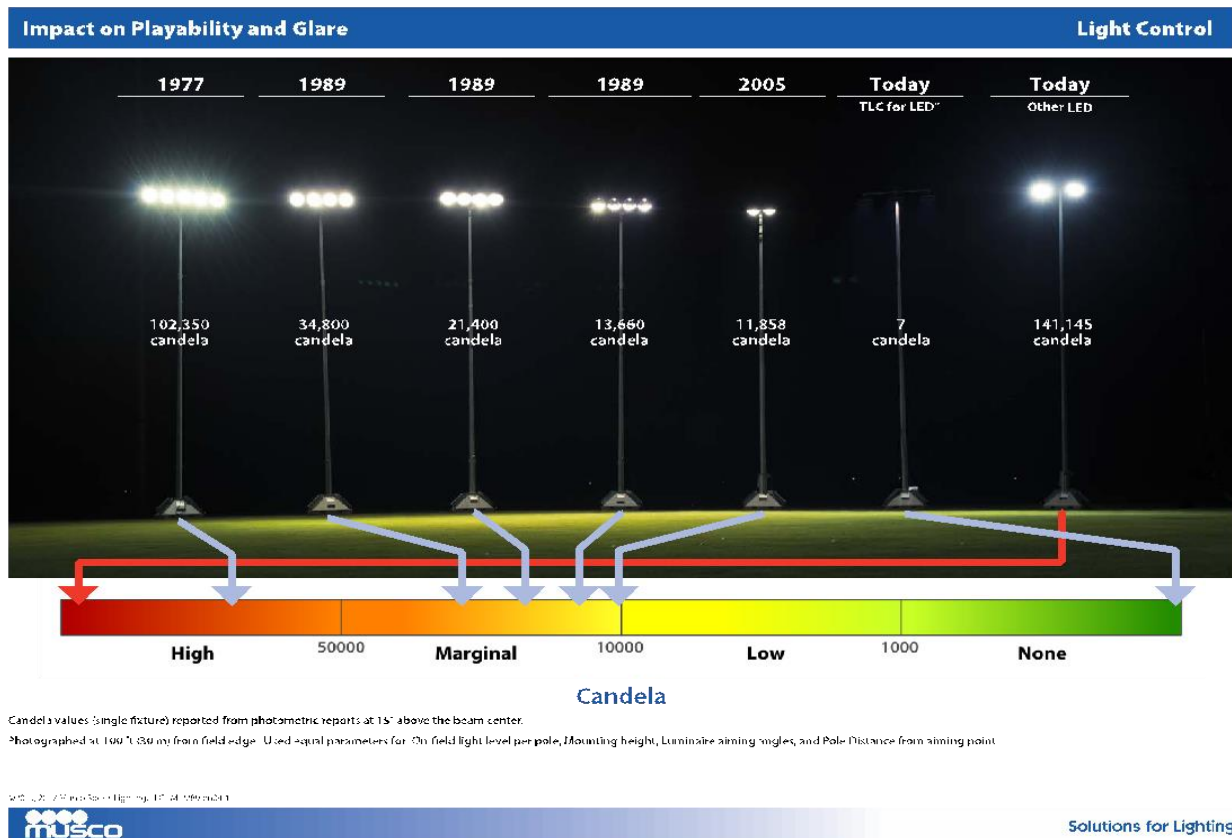
The lights being proposed are state of the art. They are designed with shields that direct the light to the field, and only to the field. On the next page is a photograph from another high school football field that Musco Lighting, our contractor, updated. It shows how the lights are targeted on the field and do not spill over to neighboring areas.



Musco, by the way, is the nation's leader in modern sports lighting, from high school fields to professional sports stadiums. (They also did the lights on the east span of the Bay Bridge.) The lights the school will be using are the same type now being used by the City and County of San Francisco when it upgrades its own recreational facilities. Musco lights are being used at least 19 Rec/Park facilities with over 40 sports fields (soccer, baseball, tennis, etc.) represented across those facilities. Some of the most recent projects include Kezar Stadium, Margaret Hayward Park, and Merced Heights Playground. Over 600 Musco lights are currently being operated in the City.

The proposed lights will eliminate the need for the noisy generator-powered portable lights used on the field in the past. These portable lights are typically used 40 to 50 nights per year and can result in light shining into neighbors' homes. The school has rented lights for football games twice in the last 20 years. Those lights utilized old technology, were noisy and produced significant glare along with light spillage. The proposed flights solve all of the problems created by rented lights.

The following diagram take a minute or two to understand but tells much of the story:



The diagram shows the impact at an adjacent property from sports lights, using state-of-the-art lights from 1977 to the present. The lights the school will be using are shown second from the right. As you can see, while those lights provide adequate lighting for the field directly beneath them, they provide very little distraction to a neighboring property owner. While some SINA members may be used to seeing some of the other types of lights shown above on nearby fields, like the South Sunset Fields (located just a few blocks from the school at Wawona and 41st Avenue), those lights are significantly more disruptive to the neighborhood than the lights the school will be using. (The type of lights used at South Sunset are shown in the 2005 column in the diagram above.) And the South Sunset field lights are used until 10:00 p.m. every night, as are the West Sunset tennis court lights that are just a block away from our school. Our lights will be turned off at least an hour earlier than the lights at South Sunset and West Sunset on all but a handful of nights each year.

In addition, SINA seems to believe that lighting the fields will dramatically intensify the use of the fields. As shown in the table below, that is simply not the case. This project is meant to shift the timing of field use, from early mornings on weekdays to early evenings on weekdays and move a handful of Saturday afternoon football games to Friday evenings.

Murphy Field Use

	Existing	Proposed	Change
Athletic Teams	79	79	0
Athletes	1,000+	1,000+	0
Total Annual Games/Meets	110	110	0
Team Practices (approximate)	750	750	0
Saturday Daytime Football Games	15	5	-10
Friday Afternoon Football Games (JV)	0	5	5
Friday Night Football Games (Varsity)	0	5	5

By eliminating early morning practices, the school can align itself with what study after study has shown – that starting school activities later in the morning is good for teens. And, by hosting a handful of football games on Friday nights instead of Saturday afternoons, the school will be reducing congestion on busy weekends (when competing athletic events pack the West Sunset soccer, baseball and softball fields). While there will, of course, be some increase in traffic on Friday evenings, the school has provided a management plan to address those issues.

One final point: SINA’s consultant suggests that planting landscaping between the field and adjacent homes would help ameliorate conditions associated with the lights. From the onset of discussions about this project with our neighbors, the school has been evaluating landscaping on the east side of 39th Avenue. The school is presently in discussions with Climate Action Now, a local non-profit, and the SFPUC to install drainage swales on Rivera Street and landscaping for 39th Avenue.

Environmental Review

SINA’s appeal of the Planning Department’s environmental determination raises two legal issues, and several subsidiary factual issues. First, SINA argues that your Planning Department does not understand the categorical exemptions under CEQA. We beg to differ. Your staff appropriately found that this project is exempt under CEQA for two reasons: (1) it is a minor alteration of existing facility and (2) it involves the installation of small facilities to existing structures. In contrast to the projects, which SINA’s so-called experts cite as comparable projects, this project is not the building of a new football field and spectator seating; it is simply adding lights to an existing athletic field. The Class 1 and Class 3 exemptions apply.

Second, SINA argues that even if the exemptions apply, this project presents exceptional circumstances requiring more review under CEQA than your Planning staff required. This is based on gross mischaracterizations of several facts. The following is a summary of why SINA’s claims lack merit.

There will be No Expansion of Use and Therefore No Significant New Noise, Parking, or Traffic Impacts. SINA repeatedly describes the project as expanding the use of the fields. This ignores the stated objective of the project, which is to shift the timing of field use, not expand

field use. The school is not planning to add new athletics programs if lights are added whose participants might pack the field. Rather the school is simply trying engage in more sane, educationally appropriate planning of practices and games to better serve its young student athletes. This fundamental fact rebuts the vast majority of the claims made by the “expert” from New Hampshire, Ms. Fisher, who SINA retained.

Noise Impacts. Ms. Fisher criticizes the Planning Department for not requiring a noise study be conducted for this project. She does so by gathering and using data from other studies of noise at other football fields in the suburbs of San Mateo and Marin County. Ms. Fisher then says because the other fields generate a lot of noise, the Department should have studied the noise that will be generated at our school’s field after lights are installed. **The glaring flaw in her argument is that noise at our school’s field already exists and has existed for decades.** There is not going to be an increase in noise from cheering fans or referee’s whistles by shifting practices from early morning to early evening. There is not going to be an increase in crowd noise or public address announcers from moving a handful of football games from Saturday afternoons to Friday evenings. Because the noise impacts are an existing condition and the only change will be when the noise occurs, the Department appropriately did not require a noise study.¹

Ms. Fisher refers to a new sound system the school plans to install. That system is not part of this project and does not require a permit. But, more importantly, that new system is expected to reduce noise impacts on neighbors. The existing, antiquated speakers share a single amplifier which controls the volume for all speakers. The proposed new system utilizes individual amplifiers, enabling volume control for each individual speaker, thereby dramatically increasing control over sound volume. An additional feature of the new system provides for assisted listening devices for hearing impaired students, athletes, parents, grandparents, and spectators. Also, the speakers will be directed away from neighboring homes and the school will not be using the system at a decibel level above the existing system.

Parking and Traffic. Ms. Fisher makes a similar error in her unscientific parking and traffic study which she admits she did from her desk in New Hampshire looking at Google Earth images and trying to count cars, parking spaces and even the number of students practicing on the field. She says that there is inadequate parking in and around the school. That will not surprise anyone who lives in San Francisco. But it is an existing condition. This project will not exacerbate parking or traffic problems; it will simply change the times when students attend practices and, on a few nights each year, when parents might attend football games.

¹ In addition, Ms. Fisher’s use of noise levels and impacts at three suburban high schools is inappropriate due to the substantially lower ambient noise levels at those locations. A proper noise impact analysis must use actual data at and surrounding a particular site to measure impacts. Because existing ambient noise levels are higher adjacent to the project site than those surrounding the San Marin, Aragon, and Hillsdale sites, any increase would be more perceptible and thus have greater impacts on noise levels.

More importantly, under CEQA, the appropriate metric to determine whether a project would have an impact on traffic is the number of Vehicle Miles Travelled (VMT), not Level of Service (LOS). The project would simply shift the times of people travelling in cars to a game; it would not increase VMT. Also, parking impacts for projects in San Francisco are only considered under CEQA when it would “result in a substantial vehicular parking deficit, the secondary effects of which would create potentially hazardous conditions for people walking, bicycling, or driving; or interfere with accessibility for people walking or bicycling; or inadequate access for emergency vehicles; or substantially delay public transit.”² The project would not create any such conditions.

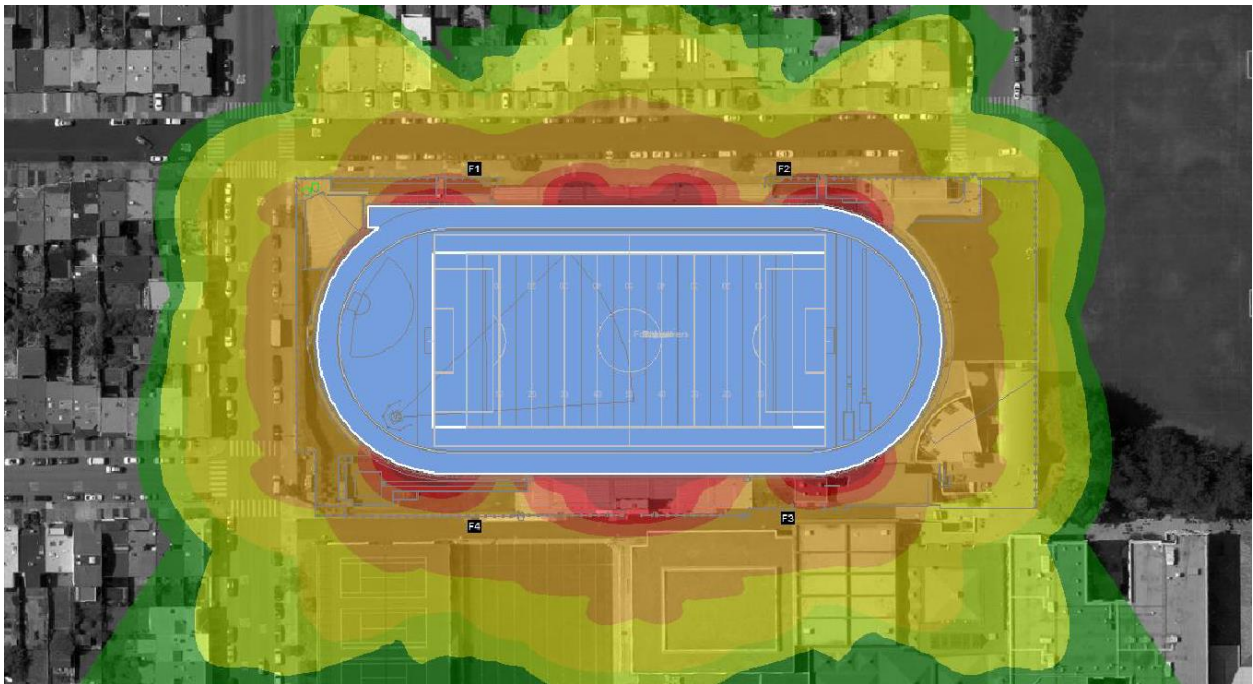
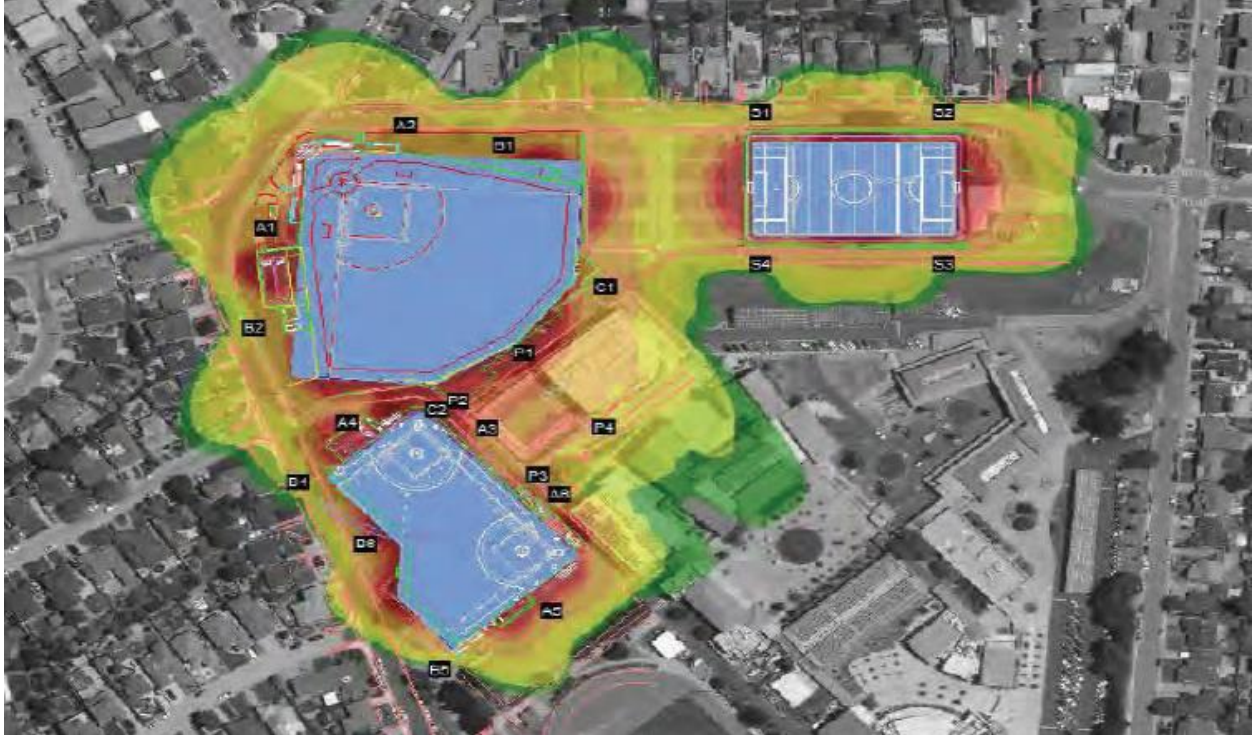
Aesthetic Impacts. Ms. Fisher also complains about the aesthetic impacts of the four poles but under CEQA, the only relevant question for a project like this in an urbanized area (aside from light and glare impacts, discussed below) is whether the project conflicts with applicable local regulations governing scenic quality. It does not, as your Planning Department confirmed.

Impacts on Sensitive Species. In addition, Ms. Fisher speculates that noise and lighting from our field could have impacts on “sensitive species.” First, our field is artificial turf. It provides no habitat for any species. Second, as explained above, any noise impacts from activities on our field that could impact wildlife already exist. Third, to the extent Ms. Fisher is saying (without evidence) that sensitive species exist near our field and those species need darkness, she ignores the existing site conditions where West Sunset lights are already on until 10:00 p.m., our practice fields are regularly lit, and streetlights surround the area.

Lights Alone Do Not Require EIRs. Appellants boldly state that the lighting of athletic fields “typically” requires preparation of an environmental impact report. That is simply not true. Appellants cite two projects where EIRs were prepared but those projects did not involve the simple addition of lights to an existing field like this project. And where other, more extensive projects have been more closely scrutinized because of other types of environmental concerns (e.g., excavation of possible Native American sites, or removal of habitat for nesting birds), those reviews have found that the impact of adding lights was insignificant.

For example, attached as Exhibit A is the Aesthetics section of an Initial Study prepared for a project to place 15 new light poles (our project has only four such poles) on baseball and softball fields and a swimming pool at Capuchino High School in San Bruno near residential homes. As you can see on the following page, comparing the light and glare impact to neighboring homes in San Bruno (the first impact map below) with the light and glare impact of our project (the second impact map below), the impact was substantially greater and more widespread in San Bruno. But even those impacts were found to be “less than significant.”

² San Francisco Planning Department, Transportation Impact Analysis Guidelines Updated October 2019.



For context, the yellow portions in these maps designate glare of 1,000 to 5,000 candela and the homes neighboring St. Ignatius are, at worst, in a yellow zone. But the criteria for significant glare is five times higher, 25,000 candelas. The above map shows that lights do just what they are intended to do: keep all significant light and glare on the field and away from the neighborhood.

Severely Flawed SINA Lighting Analysis. SINA submitted a lighting analysis from Kera Lagios that is riddled with errors and misleading statements. For example, Ms. Lagios shifts from one type of lighting standard to another to suit her preconceived outcomes. She refers to the B.U.G. rating method, but that is used to evaluate non-aimable outdoor luminaires, unlike the aimable fixtures the school will be using. In other places she mentions LEED standards, but those standards are for projects (like buildings) being submitted for LEED certification, not a simple sports lighting project like this.

She asserts that the lights may impact circadian health, but she improperly focuses on only one characteristic of lights that could cause a circadian response: color temperature of the light source. She cites no studies, and the school's lighting experts are aware of none, that show exposure to sports lighting has any impact on circadian health.

In addition, she uses the wrong data in her analysis. In an effort to mislead the Board and to exaggerate the impact of the lights on neighboring homes, she gives data not from the property lines of those homes, but from the property line of the school – across the street from homes.

Ms. Lagios states that “[t]he IES does not use candelas as a way to evaluate glare.” In fact, the IES Manual on Sports and Recreational Area Lighting, and the Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations defines limitations for light source intensity as not to exceed 7,500 candelas for rural areas, 10,000 candelas for suburban areas, and 25,000 candelas for urban areas. The value of 4,748 candelas for the school's lights at the property line of neighboring homes is dramatically below the threshold for urban areas – even well below the threshold for rural areas.

Also, Ms. Lagios uses candela calculations with reference points at 12 feet above grade, but then uses data based on calculations at points three feet above grade. This apples and oranges comparison does not accurately show the impact on neighboring homes. The lights are designed such that more light and glare would be evident at three feet than at 12 feet.

Importantly, Ms. Lagios ignores one critical fact about the lights: they can, and often will, be dimmed. Ms. Lagios assumes the lights will be on full power for all events, practices and games alike. This would make no sense for the school, the students or the neighborhood. In fact, the lights are likely to approach maximum illumination only for highly attended football games. The maximum illumination levels for these lights are within the range suggested for high school football games.

Combined Versus Cumulative Project Analysis. Finally, SINA curiously argues in one of their submissions that the Department allowed the school to “cleverly” and improperly combine two projects (lights and wireless facilities into one) and then in another submission argues that the Department improperly allowed the school to separate the lights project from other future expansion projects. Neither of these contradictory arguments makes sense. The lights and wireless facilities go hand-in-hand and are properly considered as one project. They will be

installed at or about the same time and one would almost surely not occur without the other, given that the rental income for the wireless facilities helps to fund the lights project.

The school's conceptual plans for future expansion are, at this time, purely aspirational. No concrete plans have been developed (only concept drawings) and, most importantly, no funds exist for this ambitious project. While the school would love to modernize its existing facilities, at present those plans are little more than a dream that is starting to take shape, and the Planning Department is fully aware of these hopes. Including an analysis of some potential physical expansion of the school would be overly speculative.

Conclusion

The Board of Supervisors has before it is a modest project intended to shift the times of field use to later in the afternoons and early evenings to better serve our students. It is neither exceptional or extraordinary to have lighted sports field near residential homes, and the lights St. Ignatius will be using are designed to do a far better job than older generations of lights to minimize impact on the surrounding neighborhood. The Planning Commission imposed conditions scaling back the hours of our lights well beyond the hours of lights at nearby recreational facilities and limited the total number of nights per year that lights can be used, which further limits any impacts from the lights. We ask that you reject both of these appeals and allow our school to move forward.

Sincerely,



G. Scott Emblidge

Counsel to St. Ignatius College Preparatory

Exhibit A

III. INITIAL STUDY CHECKLIST

The initial study checklist recommended by the CEQA Guidelines is used to describe the potential impacts of the proposed Project on the physical environment.

I. Aesthetics

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			X	

Discussion

- a, b) There are no rock outcroppings, historic buildings, or scenic highways on or immediately adjacent to the project site. There are also no designated scenic highways with views of the site. While there are historic or potentially buildings on

campus, the project upgrades would not adversely impact the integrity or views of these historic buildings. The project site is approximately a half of a mile away from U.S. Highway 101 and about one mile from I-280. The project improvements would not be visible from these highways due to the distance from them and the intervening topography and buildings. El Camino Real is located two blocks east of the site. The section near the project site is not designated as a Scenic Road in the San Mateo County General Plan. El Camino Real between Crystal Springs Road in San Mateo and Easton Drive in Burlingame is the only section that is considered a Scenic Road³. Therefore, the Project would have **no impact** on scenic vistas or scenic resources.

- c) As shown in Figures 4 through 10, project area is fairly visible from the adjacent streets and sidewalks

The project would introduce new accessory equipment and small structures, including two batting cages three bullpens, two dugouts, two new four-foot-high bleachers, a 100-square-foot elevated press box (approximately 25 feet from the ground to the rooftop), a 15-foot-high scoreboard, and a small (300-square-foot) storage shed.

The project would also result in the removal of several trees adjacent to and north of the softball field and the planting of 57 new trees in the project area.

The project would result in a change in the views of the campus from the adjacent streets and sidewalks that run between the campus and adjacent residential areas, including Magnolia Avenue, Park Boulevard, and Millwood Drive. However, the project would not substantially degrade the existing visual character or quality of public views of the site from the adjacent streets, because the project features would (1) either not be visible from these public vantage points due to vegetative screening, other buildings on campus, or changes in grade; or (2) would introduce minor features, such as light poles and new bleachers that, while visible, would not significantly detract from the existing visual quality of the high school campus. Because the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings the impacts on visual quality would be **less than significant**.

³ <https://planning.smcgov.org/sites/planning.smcgov.org/files/SMC-GP%201986.pdf>.



Figure 4. View of project site from Magnolia Avenue near Capuchino Drive looking southeast



Figure 5. View of project site from Magnolia Avenue looking southeast – the practice field is shielded from view along Magnolia due to shrubs and fencing.



Figure 6. View from Magnolia Avenue looking south. This Blackwood Acacia tree will remain and provides visual screening between the campus and Magnolia Avenue.



Figure 7. View from Magnolia Avenue looking east – baseball field visible in background.



Figure 8. View from Magnolia Avenue looking east -- single-family homes on the left across the street from the campus



Figure 9. Panoramic view showing tennis courts and baseball field from Magnolia Avenue looking southwest

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Figures 10 and 11. View looking north from Magnolia Avenue toward Park Boulevard with Baseball Field on the left



Figure 12. View from Park Boulevard looking north with Baseball Field on the right and single-family homes on the left

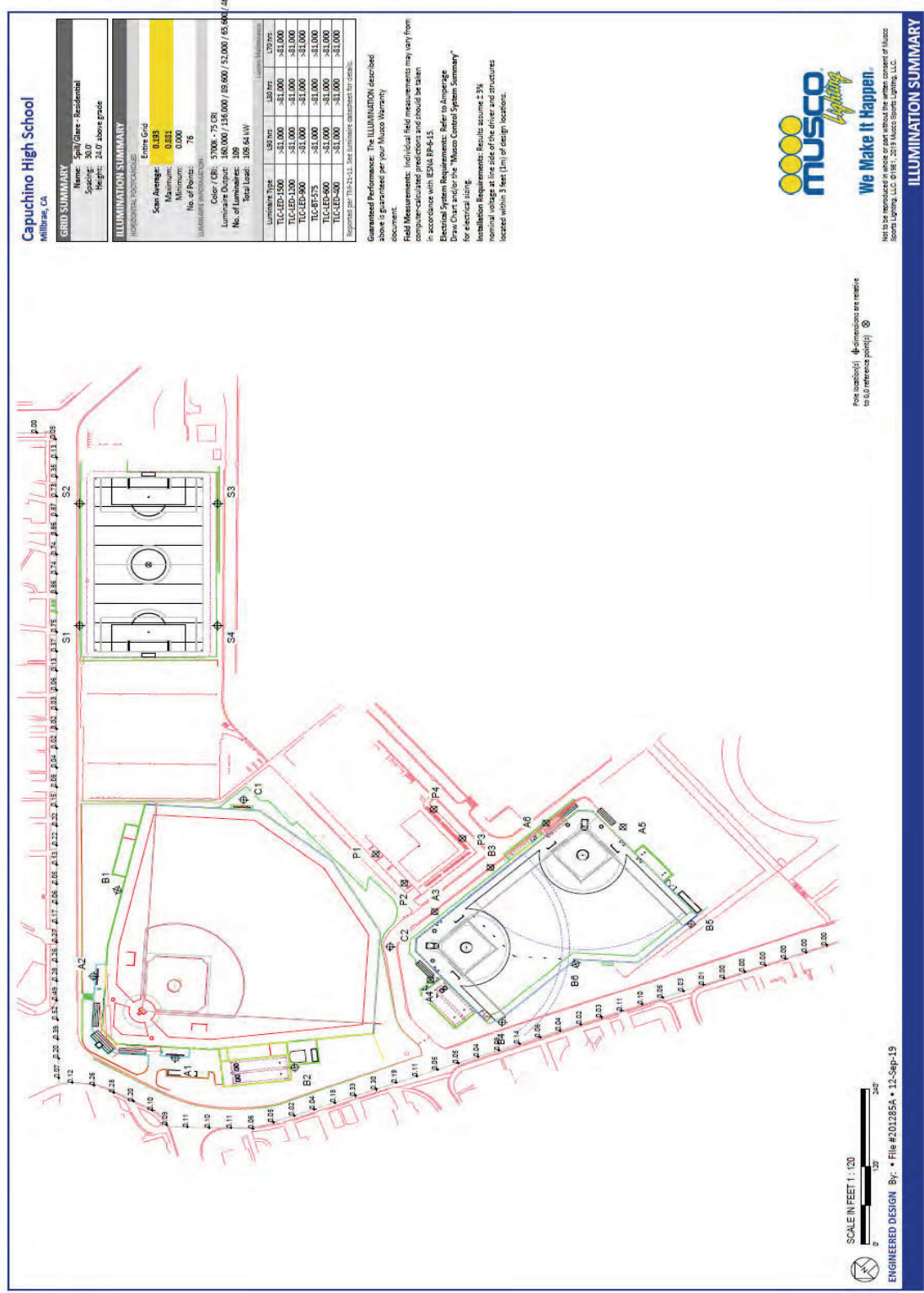
- d) The proposed project lighting for the athletic facilities would create a new source of nighttime light and glare. Currently, baseball and softball games are played from 3:30 PM to 6:30 PM. With the project, baseball and softball games would be played generally from 4 PM to 6:30 PM except on Fridays when the games would be played from 4 PM to 9 PM.

Residents adjacent to the Baseball field along Magnolia and Park Boulevard would experience new nighttime light as a result of six new 70- to 90-foot-high light poles for the baseball field. Residents along Park Boulevard would also experience new nighttime light due to five new 60- to 70-foot-high light poles for the softball field. New lighting would be provided for the swimming pool as well (four 70-foot-high poles), but the swimming pool is located towards the center of campus away from nearby residents. Two of the tennis courts would also be lit.

The proposed sports lighting for the softball and baseball fields is designed to control light to maximize illumination on the field and minimize off-site light and glare. The proposed lighting would be less impactful and more focused than older systems. Light and glare studies prepared by Musco Sports Lighting, LLC (See Figures 13 and 14 below, and Appendix B.) looked at light spillover at 76 points at the front property lines of homes across the street from the fields along Magnolia Avenue and Park Boulevard. They determined that the maximum illuminance in footcandles (fc) from proposed lights at the front residential property lines across the street from the fields would range from 0.0 to 1.0 fc, with an average of 0.279 fc. This average would be less than is typical of roadway lighting which ranges from 0.3 to 1.6 fc.

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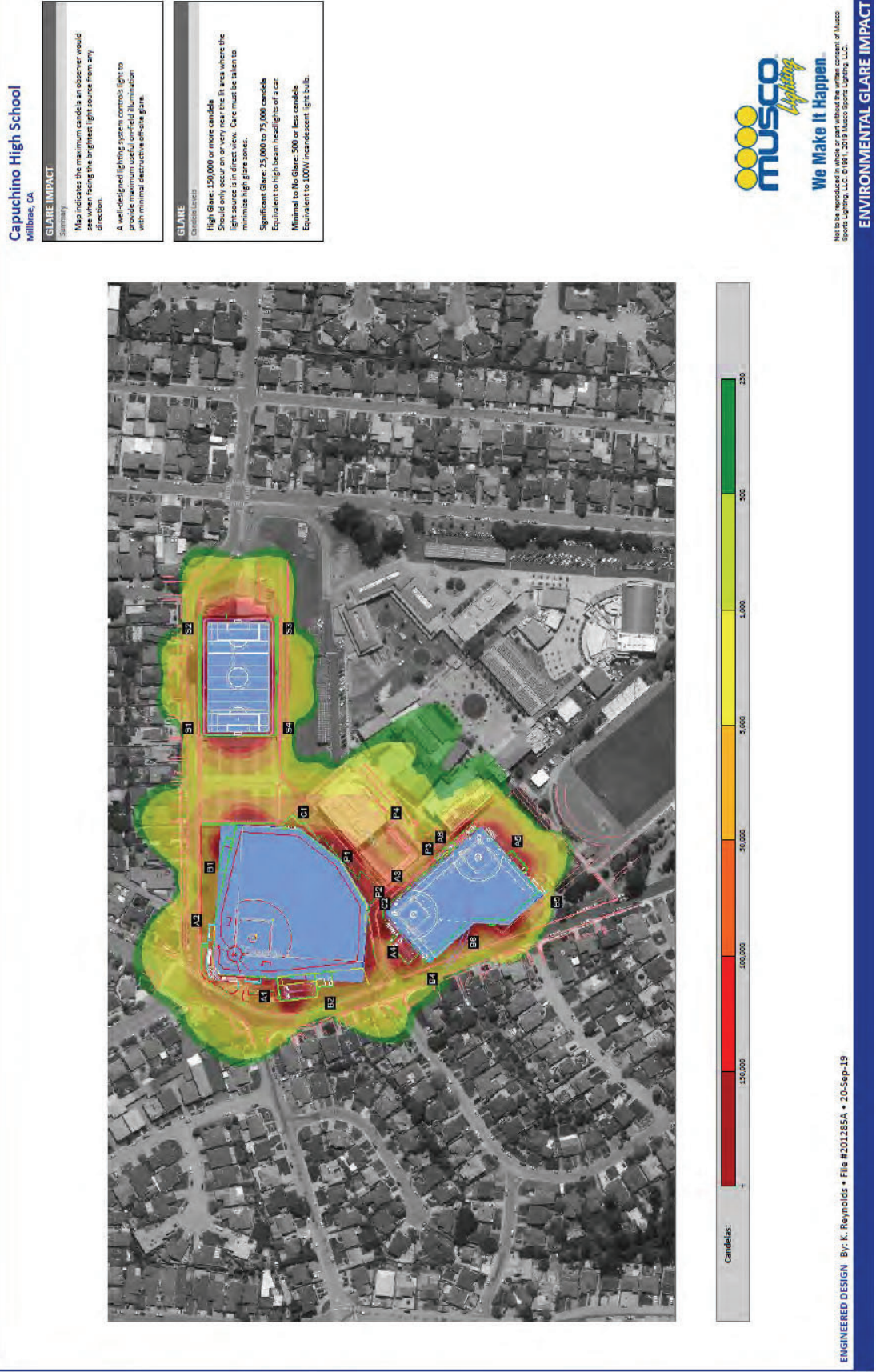
Figure 13. Illumination Summary



Source: Musco Sports Lighting, LLC, 2019

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Figure 14. Glare Impact Map



The glare impacts on adjacent residents would be limited to the areas shown in Figure 14, above. The figure indicates the maximum *calenda*, or amount of glare an observer would see when facing the brightest light source from any direction. *High glare* is considered to be 150,000 or more candela. *Significant glare* is defined as 25,000 to 75,000 candela, which is equivalent to the high beam headlights on a car. *Minimal to no glare* is 500 or fewer candela, or equivalent to a 100-watt incandescent light bulb. Figure 14 shows that the glare from the lighting that the residents adjacent to the softball and baseball fields would experience would be 5,000 candela or less, which is not considered a significant level of glare. Additional lighting diagrams are provided in Appendix B.

Currently, baseball and softball games are played from 3:30 PM to 6:30 PM. With the project, baseball and softball games would be played generally from 4 PM to 6:30 PM except on Fridays when the games would be played from 4 PM to 9 PM. While baseball and softball practices would run up to 1.5 hours longer than they currently do and Friday night games would run 2.5 hours longer than they currently run, lights would be turned off well before average bed-times. As stated above, tennis practice and games which occur in the fall and spring, would start 30 minutes later than they currently do (changing from 3:30 PM to 4:00 PM) but would not run any later than the current stop time of 6:30.

The project also would comply with San Mateo Union High School District Board Policy 7325 to limit the impacts of lighting on neighbors. **Appendix A** includes the detailed lighting policy, but applicable highlights that would govern the baseball and softball lighting are as follows:

Other [non-football] SMUHSD High School Athletic Contests After Daylight Hours

- Other nighttime athletic contests are those that start at 7:00 p.m. or later.
- These events can be scheduled throughout the school year, Monday through Friday.
- The goal is to end other SMUHSD athletic contests by 8:30 p.m., Monday through Thursday. There will be sports, such as lacrosse, that may end at 9:15 p.m. Every effort will be made to complete games as efficiently as possible.
- On Friday nights, competition level lighting will be turned off within 10 minutes of the completion of the game (typically before 9:30 p.m.).
- The Public Address (PA) system for these contests shall be limited to key game facts and shall not include running game commentary.
- The same lighting guidelines used for evening football games, and related to crowd disbursement and litter abatement/field restoration will apply.

Because (1) the proposed lighting would have only a minimal amount of spillover light and glare, (2) the hours that the lights would be on at night would be limited to non-bedtime hours, and (3) the project would comply with SMUSD policies to limit the hours

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that lighting can be used, the light and glare impacts of the project would be considered **less than significant**.