

**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

June 9, 2020

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

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Mr. Joel Koppel, President [joel.koppel@sfgov.org](mailto:joel.koppel@sfgov.org)  
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**RE: Supplement to SINA Advance Submission dated May 6, 2020**  
**PLANNING CASE NUMBER 2018-012648CUA - SAINT IGNATIUS STADIUM LIGHTING PROJECT**

Dear Planning Commission Secretary and Mr. Horn,

The Saint Ignatius Neighborhood Association (SINA) is hereby submitting a supplement to our May 6, 2020 Advance Submission Documents concerning the proposal to install stadium lighting at the Saint Ignatius athletic field as a Conditional Use (Planning Case No. 2018012648CUA).

The May 6 Advance Submission is on the SF Planning website and on Google Docs [HERE](#).

This supplement is necessary as Saint Ignatius did not start a proper permit process until after SINA's Advanced Submission was posted on the SF Planning website. Numerous important documents related to the application were not publicly available prior to the original hearing date and the Planning Department did not post all relevant documents until after SINA's submittal and, in some cases, after the original hearing date (May 14) although some documents were dated earlier. Importantly, the revised CEQA exemption determination was not posted on the Accela webpage for the project until June 3, denying us sufficient time to review it and provide these supplemental comments in the form of another Advance Submission for the June 11 Commission hearing.

Both Saint Ignatius and the Planning Department have made it extremely difficult to fully evaluate the application as a complete package. As a result, the scope of the project and the Department's evaluation of it has changed repeatedly, creating a continually moving target that has impeded public review and comment.

Sincerely

*Deborah Brown*, Association Secretary

Saint Ignatius Neighborhood Association

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

Attachment: June 9, 2020 Supplement to SINA Advance Submission dated May 6, 2020

**Supplement to  
SINA Advance Material Submittal for the Saint Ignatius Neighborhood Association  
on CUA application #2018-012648CUA**

The comments provided below supplement the May 6, 2020 Saint Ignatius Neighborhood Association (SINA) Advance Materials Submittal (“submittal” or “SINA submittal”) to the San Francisco Planning Commission for the Saint Ignatius Stadium Lighting Project. SINA filed those comments in advance of the previously scheduled May 14, 2020 Planning Commission hearing for the project (#2018-012648CUA). New and expanded comments are provided herein and reference is made to various numbered Comments in that submittal which is included in the June 11 hearing packet (starting at pdf page 110), and also available here ([https://drive.google.com/file/d/1Z1eyXDgRwAplPKLKnXIEVh-cXC1TyhY\\_/view?usp=sharing](https://drive.google.com/file/d/1Z1eyXDgRwAplPKLKnXIEVh-cXC1TyhY_/view?usp=sharing)).

Saint Ignatius did not start a proper permit application process until after the May 6 SINA submittal. Numerous documents related to the application were not publicly available prior to the original hearing date and the Planning Department did not post all relevant pre-existing documents until after SINA’s submittal and, in some cases, after the original hearing date. Many of these documents were pre-existing (some going back to 2019 like the geotechnical study) and they could have been posted much earlier to facilitate more thorough public review.

Both Saint Ignatius and the Planning Department have made it extremely difficult to fully evaluate the application as a complete package. The scope of the project and the Department’s evaluation of it has changed repeatedly, creating a continually moving target that has impeded public review and comment. Importantly, the revised CEQA exemption determination was not posted on the Planning Department Accela webpage for the project until June 3, denying us sufficient time to review it and provide these supplemental comments in the form of another Advance Submission for the June 11 Commission hearing.

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

**Comment 1.1: Other similar projects have required CEQA EIRs and an EIR is needed for this project.**

It is not uncommon, and in fact, standard practice for similar high school stadium lighting projects to prepare an Environmental Impact Report (EIR) and undergo a full CEQA review. Without EIR analysis, there is no way to determine if project impacts are potentially significant. CEQA “creates a low threshold requirement for initial preparation of an EIR and reflects a preference for resolving doubts in favor of environmental review [i.e., an EIR]”<sup>1</sup>. Many other schools have prepared EIRs for LED stadium lighting projects, including the following examples:

- a) San Marin High School prepared an EIR in response to neighbor concerns. The EIR was later rejected in a recent appellate court ruling (Appendix 1 herein)<sup>2</sup> which required the Novato School District to prepare a revised draft EIR that includes an appropriate baseline, evaluates aesthetics, analyzes the

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<sup>1</sup> <https://caselaw.findlaw.com/ca-court-of-appeal/1629130.html>

<sup>2</sup> Publicly available at <http://lawzilla.com/blog/coalition-to-save-san-marin-v-novato-unified-school-district/>

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project in light of its cumulative impacts related to other approved field lighting and future planned school changes, and addresses light spillover, glare and skyglow.

- b) San Diego's Hoover High School project was also determined to require an EIR in appellate court.<sup>3</sup> The court found that an EIR was required based on potentially significant traffic and parking impacts. The ruling noted that the school district "*abused its discretion as a decision maker under CEQA*" because there was not sufficient information about the project's impacts on parking and traffic with which to form a basis for evaluation of significance under CEQA. The court based its traffic determination on the many residents' comment letters about significant traffic problems they had observed during past events at the stadium. The ruling stated: "*any traffic problems experienced in the past logically will only be exacerbated if the Project is completed...*" The court also found that the project's traffic and parking analysis was inadequate due to the lack of baseline game attendance numbers.
- c) Monterey High School originally planned to move forward with a limited Mitigated Negative Declaration for their stadium lighting project but is now preparing an EIR in response to community concerns over the project.<sup>4</sup>
- d) Clayton Valley High School prepared an EIR and later a supplemental EIR for their stadium lighting project.<sup>5</sup> The supplemental EIR noted: "*the reassigning of practices and games to the evening hours will affect traffic patterns and evening noise conditions*" and the EIR evaluated those project impacts.
- e) Northgate High School prepared an EIR<sup>6</sup> for their stadium lighting project that included, among other aspects - detailed noise, traffic/parking studies, and lighting/glare studies.
- f) Saratoga High School prepared an Initial Study<sup>7</sup> for their stadium lighting project which included a detailed noise study, among other impact evaluations.
- g) Marin Catholic High School withdrew their stadium lighting application based on the County Planning Department's comments (see SINA submittal, Attachment 1). The Department's concerns reflect SINA's concerns about the Saint Ignatius project, including:
  - 1. The field would not be available for use by the public, the field would only be utilized for games and practices associated with the school's athletics programs; therefore, the only benefit is to the school.
  - 2. The combined effects of the project on light and glare, noise, and traffic congestion would adversely affect the character of the surrounding community.

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<sup>3</sup> <https://caselaw.findlaw.com/ca-court-of-appeal/1629130.html>

<sup>4</sup> [https://www.mpusd.net/apps/pages/index.jsp?uREC\\_ID=1424772&type=d&pREC\\_ID=1788897](https://www.mpusd.net/apps/pages/index.jsp?uREC_ID=1424772&type=d&pREC_ID=1788897)

<sup>5</sup> <https://yvhsightingproject.files.wordpress.com/2012/06/environmental-impact-report-clayton-valley-hs1.pdf>

<sup>6</sup> <https://yvhsightingproject.files.wordpress.com/2012/06/northgate-high-school-final-eir.pdf>

<sup>7</sup>

[https://www.lgsuhd.org/UserFiles/Servers/Server\\_87205/File/District%20Information/General%20Obligation%20Bond,%202014/073.pdf](https://www.lgsuhd.org/UserFiles/Servers/Server_87205/File/District%20Information/General%20Obligation%20Bond,%202014/073.pdf)

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3. While the notion of light pollution, spill light, and glare are subjective, it is apparent 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.
4. The proposed installation of a field lighting system on an existing school athletic field, would essentially serve to extend the hours of activity on the field. 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.
5. That there will be a notable change to the noise levels in the surrounding neighborhood, where the existing ambient noise levels are low during the evening hours.
6. Saint Ignatius has utilized temporary construction lighting on some occasions during the evening hours; however, it is unclear whether temporary field lighting was ever approved by the Department (submittal Fact 5.I); therefore, the baseline condition is the daytime time use of the field with no lights.
7. The impacts must be considered as combined (cumulative) effects that will result from the project as a whole, including the newly proposed extension of practice field lighting hours in addition to the addition of new lights on the athletic field.

**Comment 1.2: The project's CEQA exemption determination remains incomplete and flawed, and a full EIR is needed.**

An original CEQA exemption determination was issued on April 25, 2019. This document was later replaced on the Accela website for the project by an essentially identical document dated April 29, 2020. Both documents were then removed and replaced with a revised document containing minor modifications, dated May 5, 2020 (2018-012648ENV-CEQA Checklist0.pdf). That revision added the Verizon wireless installation as CEQA exemption Class 3 - new construction.

Yet another CEQA determination revision was dated June 3 (2018-012648ENV-CEQA Checklist2.pdf) and expanded upon the Department's rationale for determining that the now expanded project is still categorically exempt from CEQA. The Determination concludes: "*Based on the planning departments [sic] experience of conducting environmental review on similar projects near residential areas, the effects of nighttime lighting would not substantially impact people or properties in the project vicinity and would not result in a significant impact on biological resources.*"

We would like to know what specific experience the Department has with "*similar projects near residential areas*" that include this project's expanded non-public uses and 90-foot tall stadium lighting. To our knowledge, there are no other high schools in San Francisco with this type of stadium lighting, so it seems disingenuous to suggest directly-related Department experience that would inform this project sufficiently in the absence of an EIR.

The CEQA determination disregards several potential CEQA impacts without providing any evidence or basis for the categorical exemption determination and should be rejected as incomplete. We provide the following impact-specific CEQA comments:

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- a) **Traffic and Parking:** The current CEQA determination continues to state that additional transportation review is not required. It incorrectly concludes that the proposed lights *“would not expand the use....Instead, the proposed lights would shift the existing use to later times in the day and/or days of the week.”*

This is patently false. The proposal expands the current daytime athletic field uses to new nighttime hours where no existing uses currently occur, other than with temporary lights which were used until 8 pm (according to the school’s April 29, 2020 revised project proposal). This constitutes a real and significant change in use and expansion of use, which is acknowledged in the Draft Motion (see section 2 below). The Draft Motion and CEQA determination are in conflict on this point.

Surprisingly, and without any prior notice, the proposal now also requests modification to a 2003 Conditional Use Authorization (CUA Record #2003.1273C) that authorized the existing practice field lights (submittal Fact 5.A). The school now wants those practice field lights to also stay on until 10 pm on weekdays and until 8 pm on weekends (they were authorized for use only until 7:30 pm). This action would further expand use and must also be evaluated under CEQA in conjunction with the new athletic field lighting project.

Importantly, Saint Ignatius filed a revised stadium lighting project proposal dated April 29, 2020. It states that the new lights would be on Monday through Friday from August 6 to June 1 annually, and as late as 10 pm (or even later for overtime games), and as late as 8 pm on Saturdays and Sundays including for any Friday night football games postponed due to weather. Football games would last until 10 pm even on Saturday nights.

Our traffic and parking concerns are related to the overall extension of times and expansion of days in which nighttime field use would occur on both the athletic and practice fields. The school has proposed varying numbers of games and practices over time, with the most recent summary (a.k.a. “Neighbor Postcard”) posted on the school’s website on June 4, 2020.<sup>8</sup> The Postcard summary differs yet again from the April 29, 2020 revised project proposal, so it is impossible to understand the true scope and implications of the proposed expanded uses.

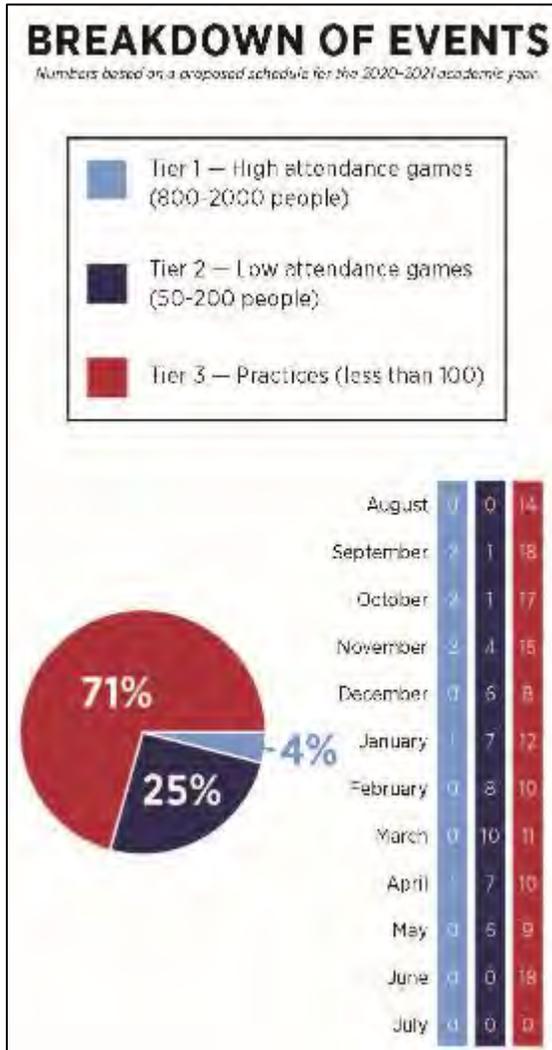
The Postcard summary is excerpted in Figure 1.a below, and apparently shows a total of 200 nights of use, but it does not provide a breakdown of weekday versus weekend days of use. As we interpret it shown in Figure 1.b, the athletic field lights would be in use from 45% to 70% of all evenings during the school year, with an overall average of 60% (excluding July for which there are no proposed games or practices).

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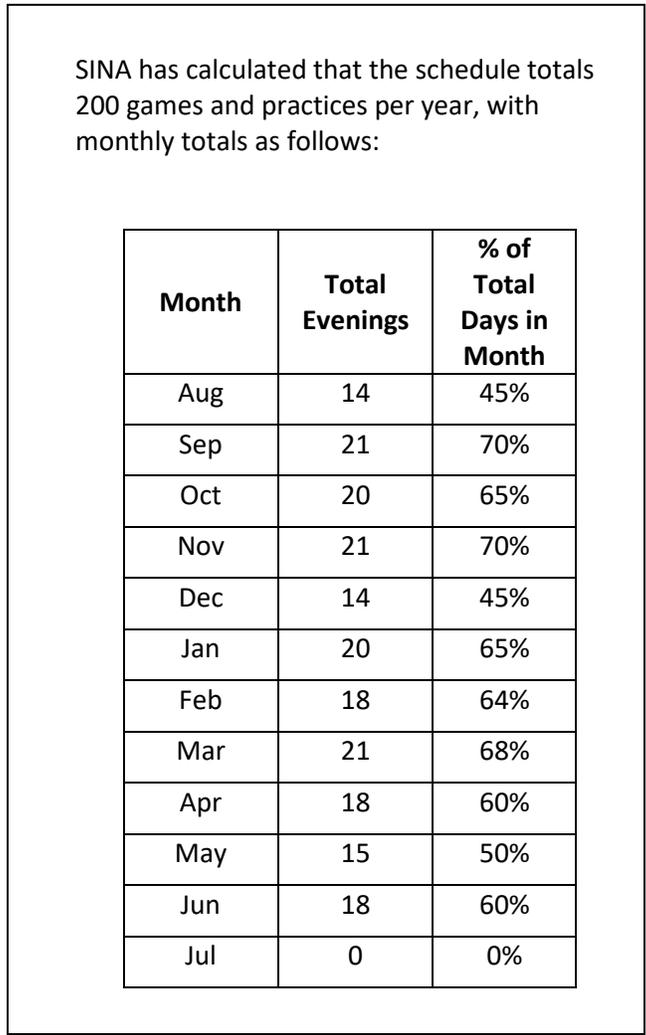
<sup>8</sup> [https://www.siprep.org/uploaded/Neighbor\\_Postcard\\_one\\_side.pdf](https://www.siprep.org/uploaded/Neighbor_Postcard_one_side.pdf)

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**Figure 1a: Proposed Athletic Field Use**



**Figure 1.b: SINA Calculations of Use**



Via a public records request, SINA obtained a 1990 traffic study<sup>9</sup> conducted at the time of a school building expansion project that did not even increase enrollment or staff. That study was well done but is now 30 years old and a new traffic study is warranted to support the current proposal. The 1990 study included detailed traffic and parking counts and surveys of parking in the surrounding neighborhood, and it evaluated the cumulative impacts of critical volumes and movements of vehicles expected with the expansion.

The school and the CEQA determination continue to incorrectly assert that shifting football games from Saturdays to Friday nights and spreading out practices would improve traffic during commuting

<sup>9</sup> Jon Twichell/Associates. Traffic Study for Proposed Alterations to S. Ignatius College Preparatory School, May 25, 1990.

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times and on Saturdays. While Saturday traffic and parking are concerns given simultaneous recreational activities at the local public fields, we reiterate that our concern it is not about commuter-related traffic on Sunset Boulevard (as stated in the April 29, 2020 revised project proposal), but rather the impacts from local traffic and parking associated with the expanded use of both of the school's fields on weekday evenings until as late at 10 pm and on Sunday evenings as well. The overall impact of the new lighting will occur up to seven evenings a week.

The school recently posted a Night Game Event Management Plan on their Good Neighbor webpage<sup>10</sup>, applicable to games and events that could draw large crowds. Perhaps that plan could help alleviate traffic and parking concerns, but in the absence of a formal traffic and parking study there is no basis upon which to evaluate the plan's effectiveness.

Verizon submitted daytime photo renditions with the proposed 90-foot tall poles (Figures 2 and 3 below) after the previously scheduled Commission hearing for the project. These photographs were taken on Thursday February 6, 2020 and based on the length of shadows, in late morning or around noontime. Assuming that day was a typical weekday during the school year, it is apparent from both images that available street parking on 39<sup>th</sup> Avenue is extremely limited under normal day time circumstances, due in part to school-related parking. Daytime parking is also quite limited on Quintara and Rivera Streets and 37<sup>th</sup>, 38<sup>th</sup> and 40<sup>th</sup> Avenues. Note that Figure 3 shows only a single open parking space on 39<sup>th</sup> Avenue.

Currently, evenings are the only quiet neighborhood times with no school-related traffic and parking. Clearly, neighborhood parking would be similarly and more severely impacted in the evenings as a result of expanded and extended weekday and weekend use of the athletic and practice fields. But in the absence of a traffic and parking study it is impossible to evaluate the extent of the impact. We continue to believe (see also submittal Comment 5.C) that a new detailed traffic study must be conducted in order to evaluate the impacts of expanded times and days of uses of both the athletic and practice fields.

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<sup>10</sup> [https://www.siprep.org/uploaded/NIGHT\\_EVENT\\_MGMNT\\_PLAN\\_2020.pdf](https://www.siprep.org/uploaded/NIGHT_EVENT_MGMNT_PLAN_2020.pdf)

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Figure 2: Verizon Photo Rendition View 1.



verizon

Sunset & Noriega Site # 255926

Looking Southeast from 39th Ave.

2/6/20

2001 37th Ave.  
San Francisco, CA

View #1

inight photosim (707) 315-1585

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Figure 3: Verizon Photo Rendition View 2.



verizon

Sunset & Noriega Site # 255926

Looking Northeast from 39th Ave.

2/6/20

2001 37th Ave.  
San Francisco, CA

View #2

insight photosim (707) 315-1585

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- b) **Noise:** The current CEQA determination states that there would be no permanent increase in ambient noise levels or expose people in excess of noise level standards and that louder generator-powered temporary lights would no longer be used. The project now apparently also includes a new sound system which the CEQA determination states is: *“designed to direct sound away from the neighbors during games.”* The determination concludes that *“it is anticipated that noise levels would decrease”*.

The determination is flawed and incomplete and a noise study should be conducted (see also submittal Comment 5.D). The CEQA guidelines contain qualitative guidelines for determining the significance of noise impacts. A project like this will typically have a significant impact if it would:

- o Expose people to or generate noise levels in excess of those established in the local general plan, noise ordinance, or applicable standards of other agencies.
- o Result in a substantial temporary or periodic increase in the ambient noise levels in the project vicinity above levels existing without the project.

The CEQA determination does not address temporary impacts and does not consider noise in terms of the San Francisco General Plan or the San Francisco Police Code Noise Ordinance.<sup>11</sup>

Without a noise study there is no way to determine ambient noise levels and levels of exposure attributable to the project and the added use of the practice field at the same time as use of the athletic field. And in the absence of a noise study, there is no way to determine if levels would actually decrease, so the CEQA determination has no basis upon which to make that claim. The baseline for comparison is not the use of temporary lights which were just that – temporary and only used on a few occasions. The correct comparison is also not between Saturday daytime and Friday evening football games since ambient noise levels are likely to be different at those times.

- c) **Lighting:** The current CEQA determination states that the photometrics study shows light levels of less than 1 foot candle at the nearest residences, and that light and glare *“would be nominal on surrounding residential areas”*.

We question whether 1 foot candle (fc) is the valid standard to use and there is no referenced basis to explain the Department’s use this value. In addition, light levels in the revised photometric study (2020 Musco Photometrics) are well above 1 fc on the public sidewalk bordering the athletic field (up to 11.8 fc for horizontal blanket spill and 12.2 fc for vertical blanket spill). Best practices under LEED as referenced in CalGreen (see SINA submittal Topic 6) use a 0.20 fc limit for an LZ 3 (urban) zone and 0.10 fc for an LZ 2 (suburban/rural zone) which is a factor of 10 less than 1 fc. The LEED values are also exceeded at the sidewalks on both 39<sup>th</sup> Avenue and Rivera Street, in the middle of the street on 39<sup>th</sup> Avenue, and at some homes on 39<sup>th</sup> Avenue.

More important, however, are estimates of candela<sup>12</sup>. The estimated values for glare in the photometrics document are summarized in a glare map on page 18 that depicts ranges of candela

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<sup>11</sup>

[http://library.amlegal.com/nxt/gateway.dll/California/police/policecode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:sanfrancisco\\_ca\\$sync=1](http://library.amlegal.com/nxt/gateway.dll/California/police/policecode?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$sync=1)

<sup>12</sup> Candela is a measure of the intensity of a light source in a particular direction.

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estimates around the athletic field under the new lighting scheme. The map notes panel defines candela measurements of 500 or less as creating “*minimal to no glare*”, while “*significant*” glare is defined as starting at 25,000 candela and being equivalent to a car’s high beam headlights.

We agree that a car’s high beam headlights are glaringly bright, particularly if one is within a few feet or yards of them. But we doubt that the term “*significant*” used in Musco’s photometric context is equivalent to the meaning of the term “*significant*” under CEQA.

We continue to assert that even the revised photometric study remains flawed (see submittal Comments 6.A and 6.B). The scale of glare map on page 18 of the 2020 photometrics document groups all candela readings between 5,000 and 50,000 into one color code so it is impossible to determine where the 25,000-candela significance threshold would occur on the ground. The photometrics study does include candela estimates in different images that show levels above 5,000 candela along the curb along virtually all of 39<sup>th</sup> Avenue and on much of Rivera adjacent to the field.

A level of 1,500 candela is considered a reasonable approximation of a level which is perceived as glare.<sup>13</sup> Readings above 1,500 candela also exceed Musco’s own “*minimal to no glare*” category and occur at 22 of 24 homes on 39<sup>th</sup> Avenue and at all homes opposite the athletic field on Rivera Street. Readings are even higher, at over 10,000 candela at the curb along most of both street lengths.

We note that there are two types of glare “*disability*” glare and “*discomfort*” glare. Disability glare reduces visibility due to scattered light in the eye, whereas discomfort glare causes “a sensation of annoyance or pain caused by high luminance in the field of view.”<sup>14</sup> Since most lighting designs do not consider discomfort glare, we can only assume that the photometrics study only used disability glare. This should be clarified in the photometric study.

We continue to be concerned about the use of the 5,700 Kelvin LED luminaires (submittal Comment 5.F.2 and 5.F.3). Outdoor lighting with such blue-rich white light is more likely to contribute to light pollution because it has a significantly larger geographic reach than lighting with less blue light. Blue-rich white light sources are also known to increase glare and compromise human vision, especially in the aging eye.”<sup>15</sup>

The revised photometrics study is incomplete. It does not address reflected glare which is the indirect glare caused by the reflection of surrounding structures within the field of view<sup>16</sup>. Reflected glare should be considered in predictions of overall glare levels<sup>17</sup> particularly since approximately 100,000 square feet of new area around the athletic field would be illuminated. The study also does not consider skyglow (submittal Comment 5.F.2 and 5.F.3).

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<sup>13</sup> (in an indoor environment, which is often used to identify glare). See for example:

[http://solutions.cooperwiringdevices.com/content/dam/public/lighting/resources/library/literature/Ephesus/WP5\\_28003EN-Ephesus-University-of-Phoenix-Glare-Analysis.pdf](http://solutions.cooperwiringdevices.com/content/dam/public/lighting/resources/library/literature/Ephesus/WP5_28003EN-Ephesus-University-of-Phoenix-Glare-Analysis.pdf)

<sup>14</sup> <https://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=1038&context=archengdiss>

<sup>15</sup> <https://www.darksky.org/the-promise-and-challenges-of-led-lighting-a-practical-guide/>

<sup>16</sup> IESNA Recommended Practice for Sports and Recreation Lighting (RP-6-1)

<sup>17</sup> International Commission on Illumination “Technical Report: Guide on the Effects of Obtrusive Light From Outdoor Lighting Installations” (2003)

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Importantly, the photometric study fails to include any narrative description of the assumptions and methods used to calculate the estimated values shown in the various images. There are no references to specific standards upon which the study's estimated values are based. Therefore, it is impossible to determine the validity of the study, which we note was conducted by the lighting supplier with a vested interest in the school project, and not by an independent third-party.

Lastly, the CEQA determination is also incomplete because it does not consider impacts from reflected glare and skyglow on both resident and migratory birds (submittal comment 5.F.2).

- d) **Aesthetics:** The CEQA determination is incomplete since it does not include an evaluation of aesthetic impacts. The current CEQA determination still maintains that no further environmental review is required, the project is categorically exempt, and *"There are no unusual circumstances that would result in a reasonable possibility of a significant effect"*.

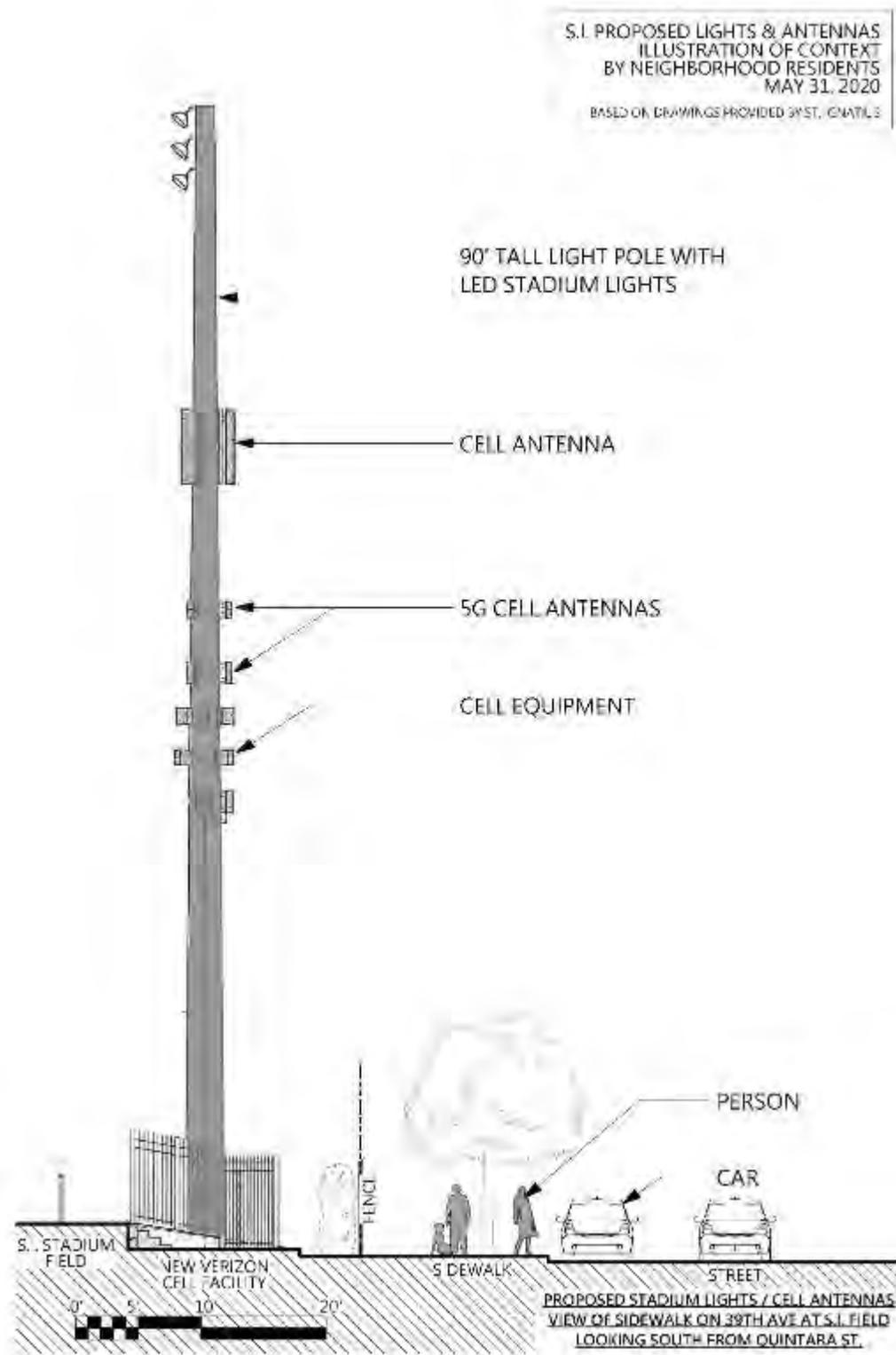
We continue to assert that new 90-foot tall poles with 12 to 13-foot wide lighting arrays (based on the Verizon scale drawings) reasonably constitute "unusual circumstances" in this location and that the project would result in the "reasonable possibility of a significant effect" on aesthetics (see also SINA submittal Comments 1.C and 3.A; and Figure 3 and Appendix 1 therein for images).

Since our prior submittal we have learned that wireless installations and light standards are exempt from the height restrictions in RH-1 districts under Code Sections 260(b)(I) and (J). However, 90-foot poles, whether for lighting or wireless facilities at this location would be grossly out of scale for this particular neighborhood (see Figures 2 and 3 above). Figure 4 below, created for SINA by a local architect, gives a sense of the relative scale of the poles to the surrounding area. Two of the four poles would be located directly inside the school's fence line as shown in the figure and would loom over the street and neighborhood at the height of a 9-story building.

- e) **Cumulative Effects:** The CEQA determination is incomplete since it does not consider the current lighting project within the context of both past and future planned incremental changes that have or could result in cumulative effects (submittal Comment 1.D). Saint Ignatius has expanded repeatedly over the last 50+ years and has plans for additional expansions, including the current side request to extend practice field lighting use from 7:30 pm to 10 pm. At the very least, with the newly proposed expansion of hours for the practice field, there are undoubtedly cumulative and potentially significant effects when both fields are being used at night at the same time.

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**Figure 4: Scale Drawing of Stadium Lighting Poles**



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**2. The CUA approval recommendation and draft Commission motion is flawed and incomplete, and the application should not be approved.**

**Comment 2.1: The project should be separated into two CUA applications and should be evaluated separately.**

The Draft Motion basis for recommendation to approve the project with conditions (p. 3 of the Draft Motion Executive Summary) states: *“the Department finds the project to be necessary, desirable, and compatible with the surrounding neighborhood, and not detrimental to persons or adjacent properties in the vicinity.”* We strongly disagree, as discussed in detail in SINA’s May 6 submittal (Section 5) and in the comments throughout this supplement.

While the wireless facility portion of the project may meet the above criteria and applicable portions of the San Francisco General Plan, the wireless installation should be evaluated separately from the stadium lighting project. Saint Ignatius has stated, the Department agrees, and we do not dispute that a new 5G Verizon wireless installation will likely benefit wireless and emergency communications in the neighborhood and city. However, without cell antennas the stadium lights would not provide these benefits. The school is attempting to justify the lighting project based on benefits of the wireless project.

Conversely, Verizon has stated that they do not require 90-foot tall poles (or stadium lights). Nor does a new wireless facility need to be located on this particular athletic field. Verizon needs only a single pole, or a suitable rooftop, and the proposed wireless apparatus is at a 60-foot height on a single 90-foot stadium lighting pole. Verizon is attempting to justify their preferred location for the wireless facility based on the lighting portion of the project (see also Comment 3.c below).

The proposed new wireless installation and stadium light projects should be decoupled and evaluated separately under the Planning Code. Additionally, alternatives to the wireless facility must be evaluated under the Planning Code and the lighting project must be evaluated under CEQA and the Planning Code before Commission approval of either project.

**Comment 2.2: SINA has reviewed the draft Commission motion prepared by Department staff<sup>18</sup> and we have several important concerns with the Department’s conclusions.**

- a) Pages 3-4 of the Draft Motion, Public Outreach and comments, states that the school held four community meetings. We correct this error in Comment 3.3 below. We can also update the number of SINA petition signatures noted in the Draft Motion which states 150 signatories. As of June 8, 2020, over 200 individuals have signed the petition in opposition to the project (see Appendix 2 herein for the petition results and related signatory comments).
- b) Finding 2 in the Draft Motion states: *“The addition of the lights will allow weekday and weekend evening use of the field for practice and games until 10:00 pm.”* Thus, the Department acknowledges that the project constitutes new and expanded uses. However, the CEQA

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<sup>18</sup> <https://commissions.sfplanning.org/cpcpackets/2018-012648CUA.pdf>

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determination and Finding 14.B.ii in the Draft Motion both state that the proposed lights “*would not expand the use....Instead, the proposed lights would shift the existing use to later times in the day and/or days of the week.*” Clearly, these two statements are in conflict and must be resolved.

- c) Finding 6 summarizes the Commission’s wireless siting location preference guidelines which were last updated in 2012. We could not find a copy of the 2012 update, only a one-page summary on the Planning website.<sup>19</sup> However, Finding 6 fails to list “Disfavored Sites” (Preference Site 7) which are sites on buildings in zoned residential districts such as at this location.

Such disfavored sites require alternative site analysis that demonstrates no other viable candidate site for the proposed wireless installation. Finding 6 also notes that under Section 8.1 of the wireless siting guidelines, the Commission will not approve wireless applications for Preference 5 or below unless the application describes:

- The other publicly-used buildings, co-location sites, and other Preferred Location Sites located in the geographic service area;
- the good faith efforts and measures to secure more preferred locations and why those efforts were unsuccessful;
- and demonstrates that the selected location is essential to meet wireless demands.

The Verizon CUA application goes so far as state that these requirements are “not applicable”. We are not aware that Verizon has done proper due diligence to secure an adequate, alternative site. Furthermore, Finding 7 states: “*the proposed WTS facility is at a Location Preference 2 Site (Co-Location site)...making it a desired location.*” A Preference 2 Site is defined as co-location on buildings that already have wireless installations, not co-location on theoretical new poles that are assumed to be approved but are not yet installed, and which do not already have wireless facilities on them.

It is incorrect to consider the proposed wireless facility as a Preference 2 Co-Location site, and therefore, an alternative site analysis must be conducted. Since Verizon has indicated they only need 60-foot high antennas, not 90-foot poles, it is quite likely that there are alternative sites such as on buildings within the same coverage area that comply with lower numbered Location Preference sites (e.g., sites 1 – 4).

- d) Finding 13.B and a Finding identified as #6 (after 14.D on page 9) discuss the school’s request for an exception to rear yard requirements under Code Section 134. The rear yard requirement applies to the two light poles and Verizon lease area on 39<sup>th</sup> Avenue. The required 25% rear yard setback would be 137.5 feet from the property line.

We have no objection to the proposed location of the Verizon ground-based lease area. However, drawings provided by Verizon show the stadium light poles located within 11 feet of the sidewalk on 39<sup>th</sup> Avenue, and within less than 100 feet of the homes on 39<sup>th</sup> Avenue. The rear yard requirements are intended to, among other things, “*maintain a scale of development appropriate to each district, complementary to the location of adjacent buildings*” (Code Section 134(a)(2)). Clearly, 90-foot tall poles so close to the school’s property line, to the public way, and to homes across the

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<sup>19</sup> <https://archives.sfplanning.org/documents/8709-Wireless%20Telecommunications%20Services%20WTS.pdf>

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street is not an appropriate scale of development for, nor complementary to this neighborhood. Appendix 1 of SINA's prior submittal shows various photo renditions and a scale drawing that illustrate the size of the poles in relation to surrounding structures.

- e) Finding 14.A states that the lighting project *"maintains and expands an educational and recreational use, which are uses that support of [sic] families and children in San Francisco"* and that it *"promotes the operation of a neighborhood-serving school."* We reject these assertions since the recreational uses are only available to students and parents of the school and their athletic competitors, not to neighborhood residents. The school is not neighborhood-serving since it is a private school charging high tuition, it is not a public institution, and it does not provide any public services to the local Sunset community. As discussed below in Section 3, there is no evidence to support the notion that the school serves more than a very small number of students who may live in the immediate neighborhood.
- f) Finding 14.B.i. incorrectly excludes the height of the 90-foot poles from consideration of the nature of the proposed site including *"the proposed size, shape and arrangement of structures."* We reject this approach since the tall size and arrangement of the new light poles will most certainly and significantly *"alter the existing appearance of character of the project's vicinity"* while the discussion says they will not.
- g) Finding 14.B.ii. incorrectly states (as noted above) that new lights would not expand use of the facility. We also reject the assertion (also noted above) that *"the proposed use is designed to meet the needs of the immediate neighborhood"*. Lastly, the Finding states the new use *"should not generate significant amounts of vehicular trips..."* This assertion has no basis in fact since no traffic study has been done upon which to base a finding of no significance (see also Comment 1.2.a above).
- h) Finding 14.B.iii incorrectly states *"noise or noxious emissions from continued use are not likely to be significantly greater than ambient conditions..."* Again, this assertion has no basis in fact since no noise study has been done upon which to base a finding of no significance (see also Comment 1.2.b above). As for noxious emissions, SINA's May 6 submittal details neighborhood concerns over the variety of noxious emissions generated by the existing uses of the athletic field that will certainly be exacerbated by the proposed expanded number of days and times the athletic field is in use.
- i) Finding 14.C discusses the Department's conclusions related to applicable provisions of the Planning Code and the General Plan, again making statements incorrectly or without factual basis, including:
- *"Nighttime use of the field is not expected to adversely impact traffic and parking."*
  - *"The project is desirable because it promotes the operation of a neighborhood-serving school."*
  - That the project is *"necessary, desirable and compatible with the surrounding neighborhood."*
  - That the project will not be *"detrimental to persons or adjacent properties in the vicinity."*

We reject these assertions since there is no basis to determine the level of traffic and parking impacts; the school is not primarily neighborhood-serving; and the project would in fact be detrimental to neighbors and properties due to noise, litter, public urination, light pollution impacts,

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and will adversely impact the normally quiet evening neighborhood on average 60% of the time (Figure 1b above).

The only portion of the project that might possibly be necessary or desirable for the surrounding neighborhood is the added wireless service. However, as discussed in Comments 3.a and 3.c above, alternative wireless sites that would provide the same benefit have not been evaluated. Also as discussed in Comments 2.b and 2.d above, the proposed 90-foot tall light poles are in no way compatible with the surrounding neighborhood.

- j) Page 9 of the Draft Motion discusses Planning Code Section 304 (under an item identified as #6 inconsistent with the Motion's numbering scheme of Findings). Item 6.A attempts to justify the school's request for rear yard modification apparently based on Code Section 304(a) which states: *"In cases of outstanding overall design, complementary to the design and values of the surrounding area, such a project may merit a well-reasoned modification of certain of the provisions contained elsewhere in this Code."*

It is unfathomable how this project could in any way, be considered complementary to the design and values of the surrounding area, or that a rear yard modification that eliminates the rear yard setback almost entirely constitutes a "well-reasoned modification" within the intent of the Code (see also Comment 3.c above).

- k) Finding 15 discusses the project's compliance with the General Plan. Under Commerce and Industry Policy 7.2, the Department contends that the project will provide *"more flexible use of the athletic facilities"*.

While likely true, the larger concern is the expanded times and increased number of evenings that the facilities would be used. We disagree that the project would *"avoid or minimize disruption of adjacent residential uses"* as required under that policy. In addition to other comments herein, one major disruption would be to the daily lives of neighbors, especially those with small children that typically go to bed before 8 pm. With field lights and noise from games and practices until 10 pm, these children will not be able to fall sleep which would disrupt their circadian rhythms which are essential to good physical and mental health.

- l) Under Finding 15, Commerce and Industry Element Objective 7, Policy 7.3 – the Department states that the school's educational services are *"available to residents of the local area neighborhoods..."* As noted elsewhere herein, this is true only for those who can afford the tuition with or without tuition assistance. The school has not demonstrated that it provides services to the majority of neighborhood families.
- m) Under Finding 15, Housing Element Objective 11, Policy 11. 8 - the Department attempts to justify compliance by stating that the project *"will minimize disruption by expanding the school vertically on the existing campus."* This is a meaningless argument and does not demonstrate that the project meets the intent of the Policy which is to consider the neighborhood character and minimize disruption. The extent and nature of disruptions are numerous and varied as discussed elsewhere herein and in SINA's May 6 submittal including: traffic, parking, noise, light pollution, litter, public

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drinking, and public urination. These disruptions would be exacerbated by increasing the number and duration of these impacts on residential areas caused by the supposed “vertical expansion”.

- n) Under Finding 15, Commerce and Industry Element Objective 1, Policy 1.2 - the Department falsely states that the project will provide recreational services for residents and workers in the City. The only recreational services would be provided to private school students. While the wireless installation would provide presumably enhanced communications services, we again assert that evaluation of the lighting project should be separated from evaluation of the wireless project (see comment 2.1 above) since the lighting project alone does not support this Policy in any way.
- o) Finding 15, Commerce and Industry Element Objectives 2, 4, and 8, Visitor Trade, and the Community Safety Objectives all apply only to the wireless installation and not the lighting portion of the project which does not support these General Plan Elements.
- p) Finding 16 discusses Planning Code Section 101.1(b) and the City’s eight priority planning policies. Finding 16.B again states that the *“expansion...has been designed to be sensitive to the surrounding neighborhood character.”* This is incorrect as shown throughout these comments and SINA’s May 6 submittal.
- q) Finding 17 also asserts that the project would *“contribute to the character and stability of the neighborhood...”* without any specific, valid basis for that conclusion which we believe is entirely without merit. Furthermore, SINA’s May 6, 2020 submittal also details consistent neighbor concerns that will be significantly exacerbated with new stadium lighting and expanded use of the athletic and practice fields. These uses will adversely impact the overall livability of a quiet residential neighborhood (see Comment 3.3 below, and SINA submittal Facts and Comments 5.A- 5.F).

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

**Comment 3.1: SINA has proposed an alternative plan to enable Saint Ignatius to have a limited number nighttime sporting events, but the school is unwilling to consider this proposal.**

In 2018, SINA first proposed to the school that it consider alternatives to permanent stadium lighting. Specifically, we verbally suggested that they continue to rent temporary lights as needed for a limited set number of large sporting events a year. We explained that if they could give the neighbors pre-notification of such nights, we could move our cars, have our children sleep elsewhere, and in general, be prepared for the events. The school administration would not even consider this alternative proposal.

SINA continues to question and challenge the school’s true ‘need’ for permanent stadium lighting. In a meeting with school administration, Tom Murphy stated that permanent stadium lighting would be a valuable marketing tool for recruiting top student athletes.

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Saint Ignatius' enrollment totals only 1,600 private students. As of Feb 2020, Lowell High School has 2,774 students, Lincoln has 2,070 and George Washington has 1,995.<sup>20</sup> These highly regarded public high schools are all able to have vibrant and healthy sports programs for their students without the need for permanent stadium lighting.

As further perspective, the school rented temporary field lighting for 5-6 weeks between November 2019 and January 2020. Often the lights were on with no one on the field, approximately 10-12 times. Additionally, quite often only a few students and coaches were on the field and they could have easily fit onto the practice field with its existing lights.

SINA suggested the temporary lighting proposal again recently, since the school states that large nighttime sporting events will occur only eight times a year. However, they responded that this proposal would not work for them. We request that the school and the Commission give this and other alternative plans fair consideration.

**Comment 3.2: Saint Ignatius has not fully addressed all SINA questions and concerns nor have they communicated directly with our Association.**

Prior the April 29, 2020 remote Pre-Application Meeting, SINA submitted a consolidated list of questions from the Association via email. Other neighbors posted individual questions through the "Ask SI" link on their Good Neighbor webpage. Only some of these questions were addressed and those only partially at the April 29<sup>th</sup> meeting. Mr. Murphy who hosted and managed the meeting determined that the remaining questions were "*not relevant to the project.*"

As a result, SINA resubmitted the questions on April 30<sup>th</sup> with clarifications as to how the question(s) directly relate to the project (see SINA submittal, Appendix 3). We asked that the answers be submitted to the SINA email address and provided it several times in our clarified question list. We have never received any correspondence from the school at that email address.

The school did not provide answers to these questions until May 28, 2020 and only then posted them on the Accela website (but not on the school's Good Neighbor webpage) in a document titled "Summary of Discussion from Pre-Application Meeting". This document was not sent to the SINA email address as requested throughout our clarified questions.

Additionally, the school has not responded to the Zoom Chat comments made by neighbors at the April 29 pre-application meeting, nor has the school made the chat log public. We attach our own screen captures of the Zoom chat comments taken during the meeting (Appendix 3 herein). Many neighbors have also never received a response to their questions submitted via the 'Ask SI' webpage.

In their Summary of Discussion from Pre-Application Meeting (Appendix 4 herein), the school still does not answer several key questions/concerns of ours, including:

SINA Question /Concern #9: We are not 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

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<sup>20</sup> <https://www.sfgate.com/sf-locals/article/biggest-high-schools-enrollment-san-francisco-15038809.php>

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sporting events during natural day time light. Why is it necessary for Saint Ignatius to have stadium lighting for night time sports?

Saint Ignatius (SI) Response: *“At the meeting, SI explained that the lights are needed due to expansion of our sports program over the past several years and the lack of and competition for available practice field space in San Francisco. Post meeting, SI informed the neighbors that SF Public Schools and other entities use Kezar Stadium for their lighted games.”*

If other schools can schedule their sports program during day light house and use Kezar Stadium for their lighted games why can't Saint Ignatius? As noted above, the school's total enrollment totals only 1,600 private students while other schools have more students and they are all able to have healthy sports programs for their students without permanent stadium lighting. Additionally, many of Saint Ignatius “expanded sports” do not require a lighted field. Out of 15 sports, 10 do not use the athletic field (basketball, volleyball, golf, cross country, tennis, water polo, rowing, softball, swim & diving, baseball).

SINA Question /Concern #14: 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.

SI Response: *“SI did not answer this question as we believe it is not pertinent to the project.”*

SINA has requested this information repeatedly since the lighting project was first proposed in 2015. What percentage of Saint Ignatius private school students come from our neighborhood -- or even close to our neighborhood? This information request speaks directly to how, and if, stadium lighting will benefit the immediate neighborhood as their CUA and CEQA applications assert. We are not requesting personal student information, just a regional numeric/percentage breakdown.

SINA Question /Concern #15: In your response to comments at the [September] 2015 neighborhood meeting, you said you would involve an acoustical engineer if your 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

SI Response: *“We do not recall such a promise. The sound system is state of the art which we believe will be far better for all involved. Sound will only be used for large attendance games and not for practices. The number of noise events will remain the same with the lights, however, the time will be shifted from Saturdays to Friday afternoons and evenings.”*

Please refer to the 2015 Saint Ignatius neighborhood meeting (SINA submittal, Appendix 4.b). Therein, the Station 3, Response #8 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.”* As noted in Comment 1.2.B above a noise study is still needed. In the absence of a noise study there is no basis upon which to determine that noise will not create a potentially significant effect, particularly if both the practice field

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and athletic field are in use at the same time. Refer to the San Francisco Police Code Article 29 which provides details on conducting a valid noise study.

SINA Question #18: Our association's architectural/engineering consultants would like to see the pole foundation design drawings and associated geotechnical report. If a geotechnical report is, or was not prepared, please explain why not.

SI Response: *SI sent the plans to SINA as requested.*

SINA never received these plans, they were not submitted to us at the email address provided. A 2019 geotechnical report was finally posted on the Accela website on or about June 2, 2020. No foundation design has been posted to date.

SINA Question /Concern #20: Questions for 4/29 Neighborhood Meeting concerning SI Field Light Proposal:

1. Can a proper lighting study with photometric calculations showing field light levels be prepared and given to the community? 2. Can a context site section drawing be prepared showing scale of 90' stadium lights with reference to surrounding residential buildings be shared with the community? 3. Can a daytime view of stadium lights prepared and shared with the community? If all of these have already been done, please present at tonight's meeting. Thank you, Jay Manzo/neighbor.

SI Response: *These items were sent to the SINA for distribution to the neighbors.*

SINA never received these plans; they were not submitted to us at the email address provided as requested. We eventually located a revised photometric study (see Comment 1.2.C above) and the Verizon wireless documents which were not posted on the Accela webpage until May 15.

**Comment 3.3: Corrections to incorrect statements made by Saint Ignatius (SI)**

In reference to the school's Summary of Public Outreach (dated May 7, 2020) on the Accela website and in the Draft Motion (pdf pp. 105-107), SINA would like to correct some false statements. We assume this is because much of the school's current administration was not present when the project was first proposed in 2015 or even in 2018 when it was reactivated.

SI statement: August 25, 2015: *"The school hosted the second neighborhood meeting: Patrick Ruff and Paul Totah from the school met with Katy Tang and 50 neighbors at the 40<sup>th</sup> Avenue home of Jack Allen."*

Correction: The school did **not** host this meeting. This was one of our first neighborhood meetings and was organized by the neighbors who invited Katy Tang and school administration. The meeting was hosted by Mr. Allen in his garage.

SI Statement: January 2016 – *"The community was informed of the lighting project via an article in The Sunset Beacon with interviews of SI staff."*

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Correction: The January 2016 Sunset Beacon article was written as a result of neighbors contacting the newspaper to express their concerns over the proposed project. The reporter reached out to the school to get their perspective. See article attached as Appendix 5 herein.

Lastly, the school's April 29, 2020 revised proposal states that neighbors have not voiced concerns over the existing practice field lights that were authorized under CUA Record #2003.1273C. This is patently false. Neighbors continue to complain about the practice field lights being left on past 7:30 and being left on with no one on the field. The school told neighbors to call their security when this happens.

In addition, records obtained under SINA's public records request for that lighting project included letters from neighbors to the Planning Department that detailed concerns over traffic, parking, noise, and garbage related to day time athletic field uses at that time – even before the practice field lights were authorized and installed. Some of those comments were related to existing daytime uses at the athletic field at that time (2003) and for which neighbor complaints have continued throughout the most recent school year until the school closed for the shelter-in-place order. Language from the Executive Summary of the Case Report for Hearing on April 22, 2004 for the practice field lighting project is excerpted below:

**Neighborhood/Community Responses:**

The Department has received approximately four telephone calls and three letters from neighbors in opposition to the proposal. One letter in support of the proposal has been received. Issues consistently brought up include noise, garbage, and parking problems associated with activities held at the School's larger athletic field located at the rear of the lot along 39<sup>th</sup> Avenue. Those expressing opposition to the project are typically under the impression that the light fixtures are to be placed at this larger playing field, rather than the smaller practice field on the upper campus. It has been Staff's experience that once the location of the fixtures is clarified, and the hours and time of usage explained, the neighbor's anxieties are eased.

#### **4. Concluding Comments**

Thank you for considering this document in which SINA has exposed and detailed the many compelling reasons why the Saint Ignatius Stadium Lighting project should not be approved. We hope you recognize the significant gaps in this project plan - the lack of a complete and through CEQA and permit application process. The school's current reluctance to address alternative plans, many of our questions, and opposing concerns -- has us stymied, despite their repeated claims of being a "good neighbor" which they used to be. Permanent stadium lights will clearly enhance the school's exclusive reputation, recruitment efforts, and benefit its private school students – they will now have the cache of 'Friday Night Lights'.

This project will, in no conceivable way benefit the public, or enhance our neighborhood or its character. After school and after their evening sports activities – the campus is locked up and the school population drives home to their own presumably quiet and peaceful neighborhoods. Evenings are the only quiet time we have in our neighborhood and those quiet evenings will be irrevocably disrupted, significantly affecting the livability of the neighborhood in adverse ways.

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**5. List of Appendices**

**APPENDIX 1:** COALITION TO SAVE SAN MARIN v. NOVATO UNIFIED SCHOOL DISTRICT APPEALS COURT DECISION, APRIL 23, 2020

**APPENDIX 2:** RESULTS OF 2020 SINA PETITION OPPOSING STADIUM LIGHTING PROJECT AS OF JUNE 8, 2020

**APPENDIX 3:** APRIL 29, 2020 PRE-APPLICATION MEETING ZOOM CHAT LOG

**APPENDIX 4:** SAINT IGNATIUS SUMMARY OF DISCUSSION FROM PRE-APPLICATION MEETING HELD APRIL 29, 2020

**APPENDIX 5:** JANUARY 2016 SUNSET BEACON ARTICLE

**APPENDIX 1**

**COALITION TO SAVE SAN MARIN V. NOVATO UNIFIED SCHOOL DISTRICT  
APPEALS COURT DECISION, APRIL 23, 2020**

Filed 4/23/2020

**NOT TO BE PUBLISHED IN OFFICIAL REPORTS**

California Rules of Court, rule 8.1115(a), prohibits courts and parties from citing or relying on opinions not certified for publication or ordered published, except as specified by rule 8.1115(b). This opinion has not been certified for publication or ordered published for purposes of rule 8.1115.

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA  
FIRST APPELLATE DISTRICT  
DIVISION THREE

COALITION TO SAVE SAN  
MARIN,

Plaintiff and  
Respondent,

v.

NOVATO UNIFIED SCHOOL  
DISTRICT,

Defendant and  
Appellant.

A156877

(Marin County  
Super. Ct. No. CIV1702295

Appellant Novato Unified School District (the District) appeals from a judgment directing it to vacate Resolution No. 31-2016/2017, adopted by its Board of Trustees, which issued an approval and certification of an environmental impact report (EIR)<sup>1</sup> for a project known as the San Marin

<sup>1</sup> “EIR” as used hereinafter refers to the final version of the EIR that was certified by the Novato Unified School District Board of Trustees. The final EIR “includes: (1) the Draft EIR and appendices, and (2) the Final EIR, which includes responses to comments, corrections and revisions to the Draft EIR, and 6 appendices.” In issuing its resolution, the Board of Trustees also considered the staff reports pertaining to

High School Stadium Lights Project. Pursuant to a writ of administrative mandamus, the trial court enjoined the project until the District fully complied with the California Environmental Quality Act (CEQA; Pub. Res. Code,<sup>2</sup> § 21168). We affirm.

### **FACTUAL AND PROCEDURAL BACKGROUND<sup>3</sup>**

At issue here is the adequacy of the CEQA review of “The San Marin High School Stadium Lights Project,” consisting of the installation of new stadium lighting, an upgraded public address system for the stadium, and egress lighting at the existing school campus.

#### **I. Environmental Setting**

San Marin High School (SMHS) is at the interface of a suburban residential neighborhood comprised of largely one-story, single family homes and open space preserves, grasslands, and hillsides. Bordering the school are San Marin Drive to the east and Novato Boulevard to the south. Across Novato Boulevard is a 98-acre park which is unlit at night; it contains open space trails and Novato Creek which runs through the park approximately

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the final EIR, the minutes and reports for all public hearings, and all evidence received by the District at those hearings.

<sup>2</sup> All further unspecified statutory references are to the Public Resources Code and the CEQA guidelines are referred to as “Guidelines section . . . .” “Whether the Guidelines are binding regulations is not an issue in this case, and we therefore need not and do not decide that question. At a minimum, however, courts . . . afford great weight to the Guidelines except when a provision is clearly unauthorized or erroneous under CEQA. [Citation.]” (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 391, fn. 2 (*Laurel Heights I*)).

<sup>3</sup> The factual and procedural background is taken, in part, from the trial court’s comprehensive 69-page opinion.

one quarter-mile south of the stadium. SMHS is also surrounded by (1) trails and single-family homes to the west; (2) single-family homes to the north; (3) multi-family residences to the northeast; and (4) open hillsides with grassland and scattered oak trees rise to the north and west.

The nearest residences are about 120 feet north and northeast of the stadium track. Because of a grassy berm, the northeastern end of the stadium is below the level of the multi-family residences. Scenic views from the stadium and surrounding residences include undeveloped ridgelines and hillsides which are dark at night. San Marin Drive to the east of the school is a four-lane street, landscaped with trees which obstruct views of the stadium from the houses to the east. The road is lightly illuminated by well-spaced street lights, but there are no lighted signs until a medium-sized shopping center approximately one-half mile north. Novato Boulevard to the south of the school is very dark in the evening. In sum, the roads and neighborhoods adjacent to the school have low brightness against a dark background of undeveloped hills and open space.

## **II. Project Objectives and Description**

The District had several objectives in pursuing the project: (1) improved stadium availability for evening/nighttime athletic fields, which would improve academic performance by minimizing early class dismissal and missed instruction time for student athletes; permit greater attendance by parents, students, and fans, which would build community spirit and increase ticket revenues; offer a safe outlet for student socializing; and reduce conflicting uses of the same field by different teams, thereby reducing accidental injuries to student athletes; (2) better lighting conditions during evening practices and games would improve safety for student athletes; and

(3) an improved public address system to better focus sound inside the stadium.

The stadium has a bleacher capacity of 2,400 persons with standing room for an additional approximately 1,600 persons. The project would involve installation of 26 athletic field lights and an upgraded public address system. The final EIR set forth the schedule for when the lights would be used: the main stadium lights would be turned off by 8:00 P.M. for practices Monday through Thursday, by 8:30 P.M. for games Monday through Thursday, and by 9:45 P.M. for Friday football games. The stadium lights would not be used on Saturdays or Sundays, with the possible exception of Saturday light usage until 8:30 P.M. for two to four Saturdays in February and two Saturdays in May for soccer and lacrosse playoff games.

The installation of new lights on existing and new poles throughout the stadium would use state-of-the-art LED lights with narrow beams to reduce light trespass and emit less light visible to the neighboring residences. Eight new 80-foot tall light poles, equipped with downward-facing 72 LED light fixtures (also known as luminaires), would be evenly spaced with four poles along each of the sidelines. Additional downward facing LED luminaires would be mounted at 70 feet on some of the 80-foot tall poles and upward-facing low-output lights would be mounted at 20 feet on the 80-foot tall poles, with the upward-facing lights turned on during the entirety of games. A second set of lower-output lights would be installed on up to 18 new and existing 30-foot tall light poles. The lights would be used approximately 152 nights per year for various sport practices and games, and on a few other occasions primarily during the fall and winter evening hours between October and March. To provide focused, distributed sound throughout the

stadium, up to 18 additional 30-foot tall public address speaker poles would be installed on the project site. The new public address system would not be used for practices or for soccer and lacrosse games.

### **III. EIR Proceedings**

On December 20, 2016, the District issued its draft EIR, and extended the public comment period to March 3, 2017. The Coalition, its members and other concerned citizens submitted written and oral comments asserting deficiencies in the project and draft EIR. On May 10, 2017, the District issued its final EIR with responses to the public comments, as well as corrections and revisions to the draft EIR, and six appendices. On May 16, 2017, the District's Board of Trustees voted to certify and approve the EIR. Two weeks later, the Board of Trustees adopted Resolution 31-2016/2017 approving the project, a statement of overriding considerations, and a mitigation and monitoring program identifying the timing and responsibility for monitoring each mitigation measure.

### **IV. Trial Court Proceedings**

On June 23, 2017, the Coalition filed a petition for writ of administrative mandate (Code Civ. Proc., § 1094.5), seeking to enjoin the project until the District complied with CEQA, on the ground the EIR did not adequately examine certain significant environmental impacts; did not adequately identify and discuss mitigation measures and project alternatives; and did not examine the cumulative impacts of the project together with foreseeable future projects at the high school. The Coalition also alleged the District was required to recirculate the EIR because, after the close of the public comment period, the final EIR included new and significant information on certain environmental impacts.

Based upon “numerous instances” of noncompliance with CEQA, the trial court found the EIR inadequate as an informative document. Specifically, the court found: (1) the District “erred in adopting the CIE’s E-3 lighting zone benchmark to describe the project’s environmental setting for evaluating” the impact of the lights and corresponding mitigation measures; (2) the EIR contained insufficient information subject to public comment concerning how the District analyzed the impact of projected light and glare on surrounding communities during nighttime operations of the stadium to support the conclusion that the proposed mitigation measures would result in the impacts being less than significant; and (3) the District’s “decision not to prepare the relevant photometric studies until after approval of the project constitute[d] a prejudicial abuse of discretion because it ‘preclude[d] informed decision[-]making and informed public participation, thereby thwarting the statutory goals of the EIR process.”

The court entered judgment in favor of the Coalition, directing the District to set aside its approval of the project and enjoining it from proceeding with the project until it had fully complied with CEQA as discussed in the court’s opinion. The court’s injunction did not bar the District from conducting certain necessary photometric studies to test, calibrate, or modify the equipment to be installed for the project to comply with mitigation measures set out in the final EIR and approved by the District.

The District timely appealed.

## DISCUSSION

### I. Standard of Review

In *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (*Sierra Club*), our Supreme Court clarified the appropriate standard of review: Generally, “[t]he standard of review in a CEQA case, as provided in sections 21168.5 and 21005, is abuse of discretion. Section 21168.5 states in part: ‘In any action or proceeding . . . to attack, review, set aside, void or annul a determination, finding, or decision of a public agency on the grounds of noncompliance with this division, the inquiry shall extend only to whether there was a prejudicial abuse of discretion.’ [Citation.] [The court’s] decisions have thus articulated a procedural issues/factual issues dichotomy. ‘[A]n agency may abuse its discretion under CEQA either by failing to proceed in the manner CEQA provides or by reaching factual conclusions unsupported by substantial evidence. (§ 21168.5.) Judicial review of these two types of error differs significantly: While we determine de novo whether the agency has employed the correct procedures, “scrupulously enforc[ing] all legislatively mandated CEQA requirements” [citation], we accord greater deference to the agency’s substantive factual conclusions. In reviewing for substantial evidence, the reviewing court “may not set aside an agency’s approval of an EIR on the ground that an opposite conclusion would have been equally or more reasonable,” for, on factual questions, our task “is not to weigh conflicting evidence and determine who has the better argument.” ’ [Citations.]” (*Sierra Club, supra*, 6 Cal.5th at p. 512.)

However, “when the issue is whether an EIR’s discussion of environmental impacts is adequate, that is, whether the decision sufficiently performs the function of facilitating ‘informed agency decision[-]making and

informed public participation,’ [t]he review of such [a] claim[ ] does not fit neatly within the procedural/factual paradigm.” (*Sierra Club, supra*, 6 Cal.5th at p. 513.) After describing several of its own decisions and those of the Court of Appeal, the court concluded “[t]hree basic principles emerge . . . : (1) An agency has considerable discretion to decide the manner of the discussion of potentially significant effects in an EIR. (2) However, a reviewing court must determine whether the discussion of a potentially significant effect is sufficient or insufficient, i.e., whether the EIR comports with its intended function of including ‘ “detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.’ ” ’ [Citation.] (3) The determination whether a discussion is sufficient is not solely a matter of discerning whether there is substantial evidence to support the agency’s factual conclusions.” (*Id.* at pp. 515–516.)

“The ultimate inquiry, as case law and the CEQA guidelines make clear, is whether the EIR includes enough detail ‘to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.’ [Citations.] The inquiry presents a mixed question of law and fact. As such, it is generally subject to independent review. However, underlying factual determinations—including, for example, an agency’s decision as to which methodologies to employ for analyzing an environment effect—may warrant deference. [Citations.] Thus, to the extent a mixed question requires a determination whether statutory criteria were satisfied, *de novo* review is appropriate; but to the extent factual questions predominate, a more deferential standard is warranted. [Citation.]” (*Sierra Club, supra*, 6 Cal.5th at p. 516.) “For

example, a decision to use a particular methodology and reject another is amenable to substantial evidence review . . . . But whether a description of an environmental impact is insufficient because it lacks analysis or omits the magnitude of the impact is not a substantial evidence question. A conclusory discussion of an environmental impact that an EIR deems significant can be determined by the court to be inadequate as an informational document without reference to substantial evidence.” (*Id.* at p. 514.)

“ ‘An appellate court’s review of the administrative record for legal error and substantial evidence in a CEQA case . . . is the same as the trial court’s: The appellate court reviews the agency’s action, not the trial court’s decision; in that sense appellate judicial review under CEQA is de novo.’ [Citation.] Further, ‘ “the reviewing court must resolve reasonable doubts in favor of the administrative finding and decision.” ’ [Citation.]” (*California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 262.)

Based on the above described standard of review, and based on our independent review of the record, we agree with the trial court and conclude that the EIR did not include “sufficient detail to enable those who did not participate in its preparation to understand and to consider meaningfully” certain environmental impacts of the proposed project. (*Sierra Club*, *supra*, 6 Cal.5th at p. 510, citing to *Laurel Heights I*, *supra*, 47 Cal.3d at p. 405.)

## II. EIR'S Analysis of Aesthetics<sup>4</sup>

### A. EIR Findings

The EIR analyzed, against a baseline for lighting, the project's potential aesthetic adverse environment impacts from light illumination (light trespass/spillover)<sup>5</sup>, glare intensity<sup>6</sup>, and sky glow<sup>7</sup>.

#### 1. Baseline Thresholds

The EIR used significance thresholds for the illuminance and glare generated by the proposed new lighting fixtures based on the standards adopted by the International Commission on Illumination (CIE), which is an industry group that sets limits for outdoor lighting installations depending on which of four CIE lighting zones the surrounding area falls within, i.e., E-1 to E-4.

“The CIE describes the E-3 lighting zone to include ‘urban residential areas’ of ‘medium ambient brightness.’ Several public commentators indicated that the project area is much less bright than the example areas identified in the E-3 lighting zone. These commentators argued that the designation does not correspond to the low street lighting along San Marin Dr[ive] and the surrounding residences, and that this designation flat out

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<sup>4</sup> The description is taken, in part, from quoted portions of the trial court's decision, omitting citations to the administrative record.

<sup>5</sup> “Illumination is defined as ‘the amount of light that strikes an object, including light cast by sources that are not directly seen by the viewer.’”

<sup>6</sup> “Glare ‘refers to the discomfort or impairment of vision experienced when a person is exposed to a direct or reflected view of a light source, causing objectionable brightness that is greater than that to which the eyes are adapted.’ Glare intensity ranges from the wors[t] case – ‘disability glare’ where visibility is lost, to ‘discomfort glare’ where the light is distracting and uncomfortable.”

<sup>7</sup> “Sky glow refers to illumination from upward light which increases the brightness of the nighttime sky.”

ignores the dark, unlit hills and open spaces abutting the south, west and northwest boundaries of the school. These commentators advocated for the use of the E-2 zoning rating which the CIE defines as ‘a lighting environment with low district brightness and provides as an example “sparsely-inhabited rural areas” (CIE, 2003).’ ”

In particular, “[o]ne commentator, Marc Papineau, an environmental scientist, challenged the District’s use of the E-3 standard by arguing this rating did not give sufficient deference to the dark, undeveloped open space on the edges of the project site. Papineau explained that the ambient nighttime brightness thresholds as reflected in the four lighting zones ratings (E-1 to E-4) are intended to be ‘progressive, in order to be suitably protective of the environment . . . .’ Thus, he reasoned that when a suburban area is adjacent to an unlit, or dimly lit open space the ‘prudent planning practice’ is to accommodate the contiguous, more light-sensitive area by applying the lighting standards ‘that are more sensitive to cumulative change in ambient brightness. . . .’ . . . In this scenario, that would require adopting the more light sensitive and environmentally-protective E-2 rating, for light spillover, glare and sky glow than the E-3 rating.”

“In response to these public comments,” the District explained its decision to rely on the E-3 zone standard:

“Although the project site is located near the interface of suburban development and open space, the site itself is best characterized as being located in environmental lights zone E3. Support of this classification includes the presence of San Marin Drive, a four-lane arterial roadway with streetlamps, directly to the east of the project site, suburban-density single-family housing to the east and northwest of the project site, and multi-family housing to the northeast of the site. In addition, a commercial center that includes medical offices, an animal hospital, and various retail outlets (including a Starbucks and a

Subway) is located approximately 0.25-mile east of the project site. Environmental lighting zone E2, which is defined by the example of ‘sparsely-inhabited rural areas,’ is not an appropriate classification of the project site and surrounding neighborhood. Therefore, the characterization of the Draft EIR of the project site being located in environmental lighting zone E3, which is defined by the example of ‘well-inhabited rural and urban areas,’ is appropriate. As discussed in Section 4.1, Aesthetics, of the Draft EIR, impacts related to night lighting would be less than significant with the identified mitigation measures. No changes to the Draft EIR are warranted as a result of comments pertaining to the existing ambient lighting at the project site.”

## **2. Light Trespass/Spillover**

“The [EIR] determined that the effect of light trespass/spillover on the nearest residences from illuminating the field would be significant if illumination produced by the project exceeded 2.0 foot-candles (f.c.) when measured at the vertical and horizontal planes at the high school property lines nearest the residences. This measurement was derived from an earlier project of the District, and from standards used by other California school districts i.e., light trespass is not significant if the foot candles measured at the school property lines fall in the range from 0.8 f.c. to 2.5 f.c.”

“Without first performing a photometric study to estimate the brightness of light generated by the specific fixtures, the [EIR] found that the proposed stadium lighting system may produce illumination in and around the stadium in excess of the 2 foot-candle significance threshold at the boundaries of the stadium, and would constitute a potentially significant impact. [¶] As a mitigation measure, the [EIR] proposed the District hire a qualified lighting consultant to prepare a photometric study consistent with industry standards ‘that estimates the vertical and horizontal foot-candles generated by the proposed stadium lighting on the football field and at the

boundaries of the stadium site,’ and as part of the final design of the light system, to position and shield the fixtures along the football field until they generate no greater than 2 foot-candles at the site boundaries. The [EIR] concluded that implementation of this mitigation measure would not ‘generate excessive significant light trespass at nearby residences’ and the impacts would be less [than] significant after mitigation.”

### **3. Glare Intensity**

“The [EIR] also evaluated the effect of glare on residents and on adjacent public street and sidewalks by units of intensity called ‘candelas.’ . . . The [EIR] assumed that light intensity of 500 candelas or less when measured at the school’s property lines would result in no ‘discomfort glare’ at those residences which faced the school. . . . [¶] The District used significance thresholds for glare[set by the CIE] . . . [¶] Applying the CIE designations, the [EIR] identified the project area as falling into lighting zone E-3 – which denotes ‘areas of medium ambient light, such as urban residential areas.’ For the E-3 zone, the CIE establishes a threshold of significance for pre-curfew hours (i.e., before 10 p.m.) of 10,000 candelas, and 1,000 candelas for post-curfew hours.”

“The [EIR] found that the lighting system could generate painful ‘discomfort glare’ or more serious ‘disability glare’ in excess of the CIE standard adopted for areas in the E-3 zone at residential property lines facing the stadium and on adjacent public streets and sidewalks, and these impacts are significant but mitigatable.” As a mitigation measure, “[t]he [EIR] proposed . . . the District prepare a photometric study to ensure that ‘discomfort glare’ does not exceed the 10,000 candelas limit (i.e., before 10 p.m.) at residential property lines facing the stadium, and if needed, to adjust

the position of the light fixtures illuminating the football field to meet this standard for glare, and to minimize the ‘disability glare’ experienced by pedestrians and motorists on San Marin Drive. With these mitigation measures, the [EIR] concluded that impacts would be less than significant.”

#### **4. Sky Glow**

The EIR recognized that “impacts from ‘sky glow’ would be significant ‘if the proposed lighting emits a substantial amount of upward light, significantly increasing the brightness of the sky during nighttime hours.’” However, “[t]he [EIR] states that sky glow will not be significant because the state-of-the-art downward-focusing luminaries on the 80’ poles will be using a narrow beam angle, and will be fitted with reflectors and visors to block upward light. [¶] As to the 20’ lower brightness, upward-facing luminaries, the [final] [EIR] note[d] they would be designed to provide only the minimum amount of illumination necessary to see airborne objects in the stadium [but acknowledged that the use of upward-facing lights ‘would incrementally increase sky glow when in use by reflecting light off clouds and aerosols’]. In a change from the [draft EIR] which planned for intermittent use only during kick-offs and punts, the upward lights would . . . remain on for [an] entire game; i.e., 2-4 hours.” Nonetheless, the EIR “concludes that [the] amount of sky glow will be ‘minimal’ because it will be limited to the early evening hours (before 8:30 p.m.) and ‘would occur in a location with existing nighttime lighting (including street lamps along the adjacent roadway and security lighting on the adjacent campus). Therefore, [the lighting system] would not substantially contribute to sky glow during sensitive nighttime hours. The City of Novato, being located in the greater San Francisco Bay Area, also has nighttime skies that are subject to substantial existing light

pollution, largely from sources in the U.S. 101 corridor, and that are not sensitive to additional artificial light. Therefore, the proposed stadium lights would not substantially contribute to sky glow near the school site, and impacts would be less than significant [with no need for mitigation measures].’ ”

## **B. District’s Contentions**

### **1. Project Baseline for Lighting**

The District argues that its choice for the project baseline for lighting in the draft EIR as the CIE’s E-3 lighting zone, defined by the example of “ ‘well-inhabited rural and urban areas,’ ” was within its discretion and supported by the evidence. We disagree.

The District’s chosen methodology must be supported by reasoned analysis and evidence in the record. (*Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 119-120.) Even applying the deferential substantial evidence test, we agree with the trial court that there was insufficient evidence to support the District’s adoption of the CIE’s E-3 lighting zone to describe the project’s environmental setting for evaluating the light and glare impacts and the corresponding mitigation measures and a restrictive light alternative for the project. Based on an environmental scientist’s comments concerning the appropriate way to apply the CIE’s four possible lighting zones, the trial court properly found the District, by applying the E-3 lighting zone, had “virtually ignore[d] the extensive open spaces and unlit hillsides that form a substantial boundary along the south, west and northwest edges of the project site.” The District ma[de] no effort to distinguish the unique physical features of this environmental setting from the typical, suburban

neighborhood that falls within the E-3 rating.” Because the District’s “duty under CEQA . . . [was] not served by taking a ‘one size fits all’ approach when describing the environmental setting,” the EIR was inadequate because it did “not illustrate the types of uses and infrastructure that would aid decision-makers and the public to understand the types of suburban neighborhoods that would qualify as ‘well-inhabited rural and urban areas’ under the E-3 rating[; or] contain information showing the population size of such areas, the mix of commercial, recreational or residential uses, or the number of major thoroughfares that crisscross a typical E-3 suburban neighborhood.”

We also conclude, as did the trial court, that “the District’s conclusion the project area was characterized at nighttime by ‘medium ambient brightness,’ ” was refuted by the evidence in the administrative record. “It is uncontradicted that the project area is served by only two main thoroughfares, San Marin Dr[ive] and Novato [Boulevard], with Novato [Boulevard] being dark or having very low illumination, and San Marin Dr[ive] adjacent to the stadium being dimly lit. The amount of ambient light affecting the project area is significantly reduced when one considers the dark, undeveloped hillsides and open spaces abutting several sides of the project area. These features distinguish the project’s setting from the typical ‘well-inhabited rural and urban areas’ in the E-3 zone that may be traversed by many blocks of well-lighted streets.”

We see no basis for the District’s reliance on the presence of commercial establishments to support the E-3 rating; as the trial court noted, the EIR did not contain a discussion of the following issues: (1) whether any of the professional medical offices north of the school were open during the relevant evening hours; (2) the number of stores in the adjacent shopping center that

were open at night; (3) the intensity of ambient nighttime light from any store windows and parking lots; and (4) the spacing of street lamps and “whether the light intensity was low, medium or high brightness.”

Because the administrative record did not support the classification of the environment as falling within the E-3 lighting zone, there was no proper baseline and hence no way to undertake accurate assessments of the impacts, mitigation measures, or project alternatives. Accordingly, the trial court properly found that a recirculation of the EIR was warranted on this basis. However, our decision should not be read as a determination that the E-3 lighting zone is an inappropriate baseline for the project. We hold only that the District’s choice of the E-3 lighting zone must be preceded by an adequate analysis of the trial court’s concerns with which we concur.

## **2. Light Trespass/Spillover and Glare Impact**

### **a. Photometric Study**

The District’s overarching contention is that the Guidelines do not mandate that a photometric study of the new lighting installation be included as part of the EIR. To the extent there was such a requirement, the District argues it met its obligation by including, after publication of the draft EIR, a preliminary photometric study for the project “that was conducted as part of a proposed mitigation measure (AES-3) identified in” the draft EIR, albeit conceding “[i]t is apparent” the preliminary photometric study “was never intended to be a part of the EIR itself, but rather was provided for informational purposes in anticipation of the approval of said mitigation measure.” According to the District, a photometric study does not actually measure illumination impact, but rather “projections of impacts that can, would be, and have been, controlled in producing a final design conforming to

that final photometric study. That is, the discussions of photometric studies described what the project would be, within the control of the District. Therefore, the failure to include more, or further or final studies was not necessary to an informed discussion: the public was clearly apprised that the [p]roject would perform within the parameters discussed for a final photometric study, and other studies projecting different constraints would have been misleading.” We see no merit to the District’s arguments.

We conclude, as did the trial court, that “[t]he need for detailed photometric studies to analyze the impacts from light and glare and to devise mitigation and avoidances measures to ensure the impacts will be reduced to less than significant levels, cannot be doubted. The District conceded as much in the [final EIR’s] discussion of the Aesthetics impact analysis: ‘Because a photometric study that estimates the brightness of light generated by a specific lamp, fixture, or group of fixtures at the stadium has not been prepared, it is not possible to determine whether the proposed lighting system would result in light trespass in excess of the quantitative threshold of two foot-candles at the boundaries of the stadium site. Nearby residences could be subject to excessive illuminance when stadium lights are in use. Therefore, lighting impacts are potentially significant.’” Thus, as recognized by the District’s own comments in the record, preparation of a photometric study is essential to determine whether the light/glare impacts from the project could be mitigated to less than significant levels.

We further conclude that a photometric study “was not only necessary,” but could have been included and summarized in the draft EIR and before the closure of the public comment period. The Coalition submitted, as part of its writ petition, two existing photometric studies of projects for new stadium

lighting by the District's lighting contractor Musco Sports Lighting, LLC (dated October and November 2015) which had been completed over one year" before the draft EIR. The earlier photometric studies "included equipment specifications, illumination summaries and project summaries, . . . and . . . scale site drawings of the stadium that show the eight light pole placements on the two long-sides of the field, and . . . calculated the amount of light trespass and glare intensity at the stadium site, and also at the north and east residential property lines." In an email accompanying the earlier photometric studies, the project engineer stated "he used these photometric studies to place the eight, field-light poles on the electrical plans, and requested the architect to identify the location of the egress lights so he could 'run the photometric study to install the security lights.'" The email also had attached "scale drawings showing the equipment layout and the angle of the luminaires and a project summary containing light and glare analyses in table form."

"For reasons not explained by [the] District, these studies were not included or summarized in the [draft EIR] or the [final EIR]. Nor has the District identified if the photometric study of the egress lights had been prepared, and if so, why that study was not also included in the EIRs." After publication of the draft EIR and in response to public comments, the District had the lighting contractor prepare *preliminary photometric studies* for the project that modeled both illumination and glare in and around the project site, and the District inserted these graphics into the final EIR. However, the preliminary photometric studies were not similar to October and November 2015 documents, but were "isolated illustrations, presented without a description of the District's assumptions, methodology or data." "The

accompanying text states the preliminary modeling shows that ‘neither horizontal nor vertical foot–candles are expected to exceed the 2.0 foot-candle threshold at District property lines nearest to neighboring residence’ and ‘the discomfort glare produced during operation of the proposed project should be below the 10,000-candela threshold at residential property lines facing the stadium’ and discomfort glare will be low for pedestrians and motorists (3,500 candelas or less).” “These limited preliminary modeling studies were not thereafter subject to public comment.” “Even after giving due deference to the evidentiary value” of the preliminary photometric analyses, we must agree with the trial court that those studies did not “supply substantial evidence to support the District’s conclusions that light and glare impacts will be reduced to less than significant levels,” because they constituted “unsubstantial opinion,” and failed to provide enough details or explanation for the public “to discern from the [EIR] the analytic route . . . the [District] traveled from evidence to action.’” (*California Oak Foundation v. Regents of University of California, supra*, 188 Cal.App.4th at p. 262.)

In sum, while the Guidelines do not mandate an agency perform any specific type of studies in determining potentially significant environmental impacts, we conclude the District’s failure to provide a photometric study of the new lighting installation as part of the draft EIR did not meet the CEQA requirement of an informative document subject to public comment. (See, e.g., *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist.* (2013) 215 Cal.App.4th 1013, 1038, 1039, 1041 [appellate court upheld school district’s conclusion that the project (which included new lighting at school football stadium) would not have a significant effect on the environment by means of significant light trespass (or glare or sky glow)

where initial study described the impact of the new field lighting installation “based on a photometric analysis conducted by Musco Lighting, the Project’s lighting system designer”].) As the trial court here explained: “Preparation and review of a photometric study at the time the [draft] EIR circulated . . . would have provided the decision makers and the public [with] information all participants needed to intelligently assess the scope of the potential impacts and the feasibility of possible mitigation measures,” as well as consideration of a reduced lighting alternative, “thereby fulfilling CEQA’s principle purpose, i.e., to ‘alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.’ ” (*Laurel Heights I, supra*, 47 Cal.3d at p. 392.)

**b. Deferral of Photometric Study**

We also see no merit to the District’s arguments that it did not violate CEQA by failing to provide a photometric study of the new lighting installation in the draft EIR because it deferred preparation of such a study until after the project approval and installation of the light poles as part of a mitigation measure. According to the District, the photometric study is a “design tool” that constrains how the final design is prepared and the project is built, and is “akin to a final structural design,” according to which a building would be constructed to comply with building codes, in that “the very nature” of the final photometric study requirement was to produce a study, on which design and construction would be based, that would necessarily constrain lighting impacts to those discussed in the EIR. The District’s argument is unavailing.

The record demonstrates, “[a]s reflected by the District’s own comments in the record,” that the “preparation of a photometric study is essential to

determine whether the light/glare impacts from the project could be mitigated to less than significant levels. Also, the record shows it was not only necessary but feasible, to prepare and circulate a photometric study with the [draft EIR], as illustrated by the reliance of the District and the project's principals on the two photometric studies prepared by Musco in October and December 2015, one year before the preparation of the [draft EIR].” “[T]he San Marin high school stadium and the surrounding structures already exist, the decision to illuminate the entire football field has been made, and the evenly spaced placement of the light poles along the sidelines has been illustrated in the October and November 2015 photometric studies and in the preliminary photometric study inserted in the [final EIR]. [¶] The record demonstrates that there was no reason to wait until after project approval to conduct such studies and, in fact, two photometric studies had been prepared by the District's light consultant.”

While there is no presumption that an error in failing to include information is prejudicial (§ 21005), we conclude that in this case the District's decision not to prepare a photometric study of the new lighting installation until after approval of the project and as a mitigation measure constituted a prejudicial abuse of discretion because it precluded “ “informed decision[-]making and informed public participation, thereby thwarting the statutory goals of the EIR process.” ’ ’ ( *Planning & Conservation League v. Castaic Lake Water Agency* (2009) 180 Cal.App.4th 210, 242.)

### **3. Sky Glow Impact**

The District challenges the trial court's finding that the factual basis for the EIR's analysis of the issue of sky glow and potential glare on dark skies during nighttime hours was inadequate. Because reconsideration of the

environmental impact of light and glare will necessitate a reconsideration of the environmental impact of the sky glow generated by the installation of the new lighting system, we need not address the District's contention that its discussion of the impact of sky glow was adequate.

In any event, we see no basis to disturb the trial court's finding that the EIR's factual basis for its analysis of the impact of sky glow on nighttime scenic views was "faulty. The project is not located near the City of Novato's commercial district where sky glow is expected, nor is there evidence that sky glow from the 101 freeway several miles to the east or from the lights of San Francisco Bay Area presently affects *the scenic views of the ridgelines* around the stadium." In finding that the EIR "omit[ted] material necessary to informed decision[-]making and informed public participation," the trial court did not find the District had to reach any particular conclusion when reconsidering the matter.

### **III. EIR's Analysis of Biological Resources**

As part of the final EIR, the District included Appendix A, a "new biological resource review" presented, for the first time, acknowledging that "several species of native bats may be present in the project area that are of 'special concern' to the California DWF [Department of Wildlife and Forestry]. That review concludes the 'potential impacts to incidental foraging bats would be less than significant' because: the project will not remove bats roosting habitats near the project site, e.g., trees, buildings; bats are not likely to roost near the project site since more suitable unlit roosting and foraging habitats exist ¼ mile south at Novato Creek; and while evening illumination 'may have some effect on bat foraging behavior' [given] the lack of light trespass beyond 100 feet from the stadium and the brief operation of

the lights (2-4 hours) the project would not present a ‘negative impact on the population.’”

The District contends the final EIR’s new discussion of the biological impact of the project on the habitats and behavior of a bat species was not adequate to trigger recirculation. According to the District, the information concerning the bat habitats and behavior added nothing new of substance, and it is entirely unclear how recirculation of the EIR would add to or clarify what has already been thoroughly discussed and vetted. However, as the trial court explained, the “new information” concerning bat habitats and behavior was “‘significant’” for two reasons: (1) “the [final EIR] identified the potential for stadium lighting to alter the roosting and foraging behavior of these nocturnal species by driving them to other areas surrounding the project site, which matters were not discussed in the [draft EIR];” and (2) the biological resource analysis again relied “on the District’s preparation and discussion of a preliminary photometric study, presented for the first time in the [final EIR], to support the District’s conclusion that light trespass will not affect habitat beyond 100 feet from the stadium and any lighting impacts will be mitigated to less than significant levels. The preparation of a comprehensive photometric study is central to the District’s position that the significant impacts from light trespass and glare can be substantially mitigated, and the District has not satisfactorily explained its decision not to prepare a photometric study to be circulated with the [draft EIR].”

We therefore conclude, as did the trial court, that before certifying the final EIR the District should have recirculated the section concerning the project’s impacts on bat habitats and behavior because “[n]either the public nor any other trustee agency had a prior opportunity to evaluate” the new

information or to test the validity of the District's conclusions. In so concluding, we reject the District's contention that the new information merely clarified or amplified the otherwise adequate discussion of biological impacts in the draft EIR.

#### **IV. EIR's Analysis of Cumulative Impact**

While the EIR discussed the project's cumulative impact from illumination in connection with a list of current and future non-residential and residential projects throughout the City of Novato, with none being closer than 1.2 miles to the project site, the final EIR "contains no discussion of the cumulative impacts on Aesthetics from the project, together with the related impacts of a new lighted soccer and lacrosse field already approved by the District. The installation of additional lights on 15-foot poles, when the school never hosted nighttime activities, could conceivably increase the significant environmental impacts from illumination, glare and/or sky glow on the surrounding residences and open spaces, and it was 'reasonable and practical to include the project' in the discussion."

The District contends it had no obligation to analyze the cumulative impact of the football stadium lighting project with the District's recently approved plans to convert the high school's upper baseball field into soccer and lacrosse fields ("planned conversion project") with sixteen 15-foot tall light poles because the planned conversion project was an independent project, which was neither an "integral part" nor a "future" expansion of the football stadium lighting project. However, "CEQA requires an EIR to discuss the cumulative effect on the environment of the subject project in conjunction with other closely related, past present and *reasonably foreseeable probable future projects.*" (§ 21083, subd. (b); Guidelines,

§§ 15130, 15355, italics added.) The term “[c]umulative impacts’ refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” (Guidelines, § 15355.) “If an identified cumulative impact is not determined to be significant, an EIR is “required to at least briefly state and explain such conclusion.” ’”(San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App.4th 713, 739–740, quoting from *Citizens to Preserve the Ojai v. County of Ventura* (1985) 176 Cal.App.3d 421, 432, citing Guidelines, § 15065, subd. (a)(3) [defining “Cumulatively Considerable”].)

We also see no merit to the District’s argument that the EIR did not need to evaluate the planned conversion project because it “would not include lighting . . . [and] [n]o nighttime use is planned for” that project. The record demonstrates that in response to a public comment that the planned conversion project “would have a significant number of lights, in addition to the lights included in the solar panel structures that allegedly stay on all night,” the District asserted that although no nighttime use was planned for the additional turf field, “[l]ights associated with on-site solar panels are motion-activated LED lights with dual-dimming controls,” the lights were designed to have minimal horizontal light trespass and are turned off at 10:00 P.M.,” with the draft EIR, on the stadium lights project, being revised in the final EIR to include, both “[e]xterior security light fixtures located at on-site school buildings” and located “*at on-site solar panels.*” (Italics in original.) Thus, the District’s contentions that the planned conversion project did not need to be evaluated in conjunction with the new lighting for the football stadium is unavailing.

## **V. Need for Recirculation of EIR**

Because we have addressed the need for recirculation in the context of discussing the District's other arguments, we do not separately address the issue.

### **DISPOSITION**

The judgment is modified by adding the following provision: The District shall prepare a new draft EIR that articulates the appropriate baseline for the project's evaluation, analyzes the project in light of its cumulative impact that takes into account the planned conversion of its baseball fields into lighted fields for lacrosse and soccer, assesses the project's impacts on biological resources and light spillover, glare and skyglow on the bases of photometric analysis. As so modified, the judgment is affirmed.

Respondent Coalition to Save San Marin is awarded costs on appeal.

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Petrou, J.

WE CONCUR:

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Siggins, P.J.

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Jackson, J.

**APPENDIX 2**

**RESULTS OF 2020 SINA PETITION OPPOSING STADIUM LIGHTING PROJECT  
AS OF JUNE 8, 2020**



This petition has collected  
201 signatures  
using the online tools at [ipetitions.com](https://www.ipetitions.com)

Printed on 2020-06-08

# NO To Saint Ignatius Permanent Stadium Lights

## About this petition

We the neighbors of Saint Ignatius College Preparatory, strongly oppose the installation of four permanent, 90ft tall, football field stadium lights. These lights are proposed to be in use potentially 150 nights a year and often until 9-10 pm. They will be used to host night time games, practices, and a number of other sports activities. In addition, one of the light poles will hold 5G Verizon wireless equipment.

These permanent lights will bring unprecedented nighttime noise, traffic, parking congestion, litter, and pre-post game celebrations to our quiet residential neighborhood ~~ bringing an end to quiet evenings in our own homes. No more quiet family dinners, watching TV in our own living rooms, or being able to put our children to bed early. Not to mention, the eyesore of 90ft poles towering over our neighborhood 24/7.

We urge the SF Planning Commission to deny this permit and insist Saint Ignatius (like other SF High Schools) continue their sports programs during daylight hours.

To join our the Saint Ignatius Neighborhood Association -- send an email to [sisunsetneighbors@hotmail.com](mailto:sisunsetneighbors@hotmail.com)

## Signatures

1. Name: Deborah Brown on 2020-05-27 21:09:16  
Comments:

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2. Name: Ray Brown on 2020-05-27 21:28:25  
Comments:

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3. Name: Una FitzSimons on 2020-05-27 21:36:39  
Comments:

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4. Name: Joanne on 2020-05-27 21:38:53  
Comments:

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5. Name: Christine Crosby on 2020-05-27 21:41:32  
Comments:

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6. Name: Josette Goedert on 2020-05-27 21:49:47  
Comments:

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7. Name: James R Clark on 2020-05-27 21:55:32  
Comments: I think it is a travesty of Justice that S. I. intends to "sneak" through a building project during this pandemic crisis. This speaks volumes to S I 's Character. Sincerely, James R. Clark 2194 40th Avenue, S. F. CA 94116.

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8. Name: SEIKO GRANT on 2020-05-27 21:57:43  
Comments:

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9. Name: Allison Harrington on 2020-05-27 22:01:09  
Comments: I would like to add that my family is not able to park in our neighborhood on Saturdays and Sundays, as it is. We don't want the towers because we won't have a place to park after a long day during the week. That is not fair. I am a teacher who knows that extra-curricular events are a part of growing up, but to the expense of a whole neighborhood is not a way to be a good neighbor.

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10. Name: Matthew on 2020-05-27 22:05:24  
Comments:

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11. Name: Matthew G on 2020-05-27 22:06:26  
Comments:

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12. Name: Maria OBrien on 2020-05-27 22:16:14  
Comments:

- 
13. Name: Coral Ho on 2020-05-27 22:18:48  
Comments:
- 
14. Name: Glenn Anderson on 2020-05-27 22:20:53  
Comments:
- 
15. Name: Priscilla Fong on 2020-05-27 22:28:28  
Comments: We live across the street on 41st and Quintara. When there are games, there is excessive congestion and noise in the neighborhood. Cars are already blocking part of my driveway! For this reason, I am against installing permanent stadium lights at the school.  
-Priscilla Fong
- 
16. Name: Matt Ciganek on 2020-05-27 23:15:25  
Comments: This project is clearly against the wishes of the surrounding neighborhood.
- 
17. Name: Sun Kim on 2020-05-27 23:39:39  
Comments:
- 
18. Name: Tiffany Pavon on 2020-05-28 00:05:27  
Comments:
- 
19. Name: Paula Katz on 2020-05-28 00:07:31  
Comments:
- 
20. Name: Debbie Montarano on 2020-05-28 00:15:38  
Comments:
- 
21. Name: Barbra Paul-Elzer on 2020-05-28 00:17:44  
Comments:
- 
22. Name: Kristopher OBrien on 2020-05-28 00:19:16  
Comments:
- 
23. Name: Denise Malmquist-Little on 2020-05-28 02:22:08  
Comments: This is not an area like Beach Chalet or Kezar Stadium. St Ignatius chose to build their campus in the middle of a vast, well established residential area. This is a family neighborhood with residents including new borns through 90+ year olds. Family homes are passed generation to generation. The residents of our neighborhood deserve quiet evenings, parking availability, safe streets, and clean sidewalks. The night use of the SI field will destroy all of those aspects of our homes – that has been proven by the nights SI has held events under rental lights on their field. Other schools manage their sports programs for both boys and girls in daylight hours after school and on weekends.

As home owners within about 200 feet of the SI field, we strongly oppose the installation of lights and excessive night use of that field.

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24. Name: James Yee on 2020-05-28 02:31:48  
Comments: We also have concerns about SI setting school hours later with school ending at 9:00PM and 400+ cars not leaving our neighborhood. Where are we to park?
- 
25. Name: Susan Lin on 2020-05-28 02:35:23  
Comments:
- 
26. Name: Randall Hung on 2020-05-28 02:38:33  
Comments:
- 
27. Name: Alan OBrien on 2020-05-28 02:41:06  
Comments:
- 
28. Name: Anita Malmquist on 2020-05-28 02:57:10  
Comments: As an older senior who is a 64 year-resident home-owner near the perimeter of the St Ignatius football field, I am strongly opposed to the installation & use of field lighting. Our family home will go to my adult children upon my passing; I want their inheritance to be similar to the environment and atmosphere they experienced growing up. As it is now, my family cannot park near our home from around 7:30AM – near 6PM every day that SI is in session because students take up all the neighborhood parking. The same is true for weekend field use times, various evening & weekend SI events, and extends until after 10pm when the field has been used at night with temporary lighting. From experience with SI use of their facilities at night, sound from the games & field disrupts conversations, TV watching, and more not only inside our home, but into our backyard. Litter (including beer cans, tobacco products, food & wrappers, and even urine) is left on our street and in our doorway by field activity participants. Even with shades plus curtains, light from the field and cars illuminates the interior of my home. Please: NO LIGHTS or night use of the SI field. Thank you.
- 
29. Name: Timothy Brey on 2020-05-28 03:50:26  
Comments: This project would be extremely disruptive to the character of the neighborhood with lights on until 10 pm, increased parking and noise. All of this would only benefit a small minority for private use at the expense of the public. Not a public benefit!
- 
30. Name: Adelle-Akiko Kearns on 2020-05-28 03:50:27  
Comments:
- 
31. Name: David K Little on 2020-05-28 04:29:25  
Comments: I am opposed to the installation of lighting on the SI field. In case of a major seismic event, 90' poles may fall, easily spanning the street, and cause damage to private homes & vehicles, and/or physical harm to residents.

Where is the environmental report? 30 foot deep foundation construction for the poles can cause ground shifting that undermines home foundations, disrupts ground water flow (there is a well at 40th/Quintara), and interferes with underground water pipes, gas lines, and phone and electrical wiring. Increased noise and light will disrupt home life and increased traffic will add to pollution both in the air and in water runoff on the streets. There is no educational value to this project. It only serves the financial wants of the school. There are no benefits or considerations for the residents and neighborhood. Please stop the light project.

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32. Name: Edmund Lim and Nellie Lew-Lim on 2020-05-28 06:06:38  
Comments: These PERMANENT STADIUM LIGHTS is going to ruin the QUIET SUNSET NEIGHBORHOOD! The Noises, Traffics, Parking, Litters, Urine, the Bright Glaring Lights! The peoples hanging out after and before the Games! S.I. doesn't care about the Sunset Neighborhood! All they care about is S.I. making money in renting out the Football Field!!! Now they're using the Verizon Cell Tower excuse to get the Permanent Lightnings! BOTTOM LINE IS "WE DO NOT WANT THE PERMANENT STADIUM LIGHTS"!!!!

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33. Name: Ernest Lim and Barbara Lim on 2020-05-28 06:13:34  
Comments: "WE DO NOT WANT THE PERMANENT STADIUM LIGHTS, PERIOD"!!!!

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34. Name: Linda Delucchi on 2020-05-28 08:37:20  
Comments:

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35. Name: Dorothea OBrien on 2020-05-28 13:52:53  
Comments:

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36. Name: Mafias gruffis on 2020-05-28 15:59:09  
Comments: Not only they poison us with the staunch chemical smell from their artificial turf, but now they want to disturb us more with light pollution and noise pollution

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37. Name: Michelle Ser on 2020-05-28 16:01:00  
Comments:

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38. Name: Allen Malmquist on 2020-05-28 18:27:56  
Comments: Saint Ignatius College Preparatory, in trying to push through their long-objected-to nighttime field use plans at a time when people are struggling with the deadly Covid-19 pandemic and its upheaval of our society and way of life, reveals more than ever the selfishness and callousness of this supposedly Christian organization, and their total disregard for people outside their realm of fiscal endeavors, their total lack of concern and care for their neighbors with whom they share one quiet corner of the Sunset District.

My family lived here long before the Jesuits built their school, in this suburb-within-the-city, this simple residential neighborhood, a peaceful place for family life. We've adapted over the years to having this high school less than a block away, with the associated issues of such, from students smoking in doorways to an exasperated parking problem,

since many of SI's students drive themselves to school. Change happens. But giant lights and nighttime activities more than every other day of the year is a step too far. Giant poles towering over anything else as far as the eye can see, light pollution glaring right into living- and bedrooms. The congestion, noise, traffic, litter, at an evening time when people are trying to gather for a family dinner, relax, read, watch tv, when they are trying to go to sleep, this is not neighborly, this is not right. There is no buffer to SI's field, like there is with other night-use spaces in the city, such as in Golden Gate Park. SI's football field is literally right across the street from people's homes. Such is not the place for massive illumination and late-night outdoor events. Like we have, SI must learn to adapt, to live within the scope of its environment. To Love Thy Neighbor.

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39. Name: Suzie Larsen on 2020-05-28 21:27:10  
Comments:

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40. Name: Jensen Wong on 2020-05-28 22:54:43  
Comments: NO To Saint Ignatius Permanent Stadium Lights

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41. Name: Erin Tyson Poh on 2020-05-28 23:19:45  
Comments: Do not allow this action to be rammed through without community input! Using the SIP to push through an unpopular project is unconscionable.

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42. Name: Garrick Wong on 2020-05-29 00:05:22  
Comments: They have not and do not have any control over the their students.

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43. Name: Julie Coghlan on 2020-05-29 00:06:04  
Comments:

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44. Name: Joann Kujaski on 2020-05-29 17:07:47  
Comments:

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45. Name: Shirley Xu on 2020-05-29 21:16:21  
Comments: NO To Saint Ignatius Permanent Stadium Lights !  
Each day after I come home from a day's work, we need a clean, quite and peaceful neighborhood! I need parking spot too!

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46. Name: Jan Young on 2020-05-30 00:42:34  
Comments:

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47. Name: Katherine Howard on 2020-05-30 01:01:44  
Comments: There is already too much night-time lighting in SF. Night-time lighting is damaging to both people and wildlife.

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48. Name: Winifred Bamberg on 2020-05-30 01:13:22

Comments: This change will have a huge effect on the neighborhood and needs to have community input and negotiation. The games must wait until SIP is over and so must this permit.

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49. Name: Rossana chan on 2020-05-30 01:30:29  
Comments:

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50. Name: Johnson Young on 2020-05-30 02:37:50  
Comments:

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51. Name: Mary Shea on 2020-05-30 03:22:01  
Comments: SI knew this is a residential neighborhood when they bought the property & built the new school.

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52. Name: Gregg Montarano on 2020-05-30 07:13:00  
Comments:

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53. Name: Patricia Montarano on 2020-05-30 07:15:32  
Comments:

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54. Name: Kristina Scolari on 2020-05-30 07:17:06  
Comments:

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55. Name: Elaine Lau on 2020-05-30 13:31:56  
Comments:

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56. Name: Carole Gilbert on 2020-05-31 20:51:40  
Comments: We don't want or need these 90" high lights. The games only cause disruption to our neighborhood. Cars double parked, blocking driveways, loud speaker announcing and crowds making a lot of noise and leaving garbage around our neighborhood. St Ignatius high school says they are good neighbors but this shows no consideration of us at all.

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57. Name: Anne Marie Benfatto on 2020-05-31 20:52:01  
Comments: The obvious lack of regard for the residents of our neighborhood by SI is shameful.

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58. Name: Halley on 2020-05-31 21:15:10  
Comments:

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59. Name: Janny Lee on 2020-06-01 05:46:23  
Comments: Unwanted disruption. Many non-speaking English long time residents are opposed to these lights as well and do not know how to voice their concerns. Don't interfere with the residents who actually live here.

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60. Name: Maryanne C on 2020-06-01 05:55:41  
Comments:
- 
61. Name: Matthew Harrison on 2020-06-01 06:10:23  
Comments:
- 
62. Name: Chrisy on 2020-06-01 06:15:37  
Comments:
- 
63. Name: Regina on 2020-06-01 06:33:50  
Comments:
- 
64. Name: Nina Manzo on 2020-06-01 17:37:25  
Comments: There is nothing about the S.I. project that benefits the residents of our neighborhood. But so much about the project has a negative impact on our quality of life in our homes. I am opposed to the use of these lights which will bring more noise, congestion, and light pollution to the neighborhood in the evenings, which is the one remaining window of time there is a respite here, near the school and public fields. Planning Commissioners, please do not allow this intensified use and these huge structures which are both out-of-scale for our residential neighborhood! Thank you
- 
65. Name: Ashley on 2020-06-01 19:24:49  
Comments:
- 
66. Name: Nichole on 2020-06-01 19:29:38  
Comments:
- 
67. Name: Colin Pierce on 2020-06-02 00:22:13  
Comments:
- 
68. Name: Gautam Shah on 2020-06-02 01:38:28  
Comments: This effort is fraudulent, disingenuous, and not cognizant of impact to residents adjacent to and in the vicinity of the SI property. Calling the installation of these 90 foot lights, which would be disruptive to all the neighbors around for a significant radius, calling them "essential infrastructure" is simply a ploy to get these lights installed without the consent of the neighbors. I strongly urge the SF planning commission to deny this permit until the proper environmental impact report and voices of the community are heard.
- 
69. Name: David Crosby on 2020-06-02 05:26:19  
Comments:
- 
70. Name: Sandra Henderson Koch on 2020-06-02 14:23:16

Comments:

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71. Name: Dolores Joblon on 2020-06-02 18:25:22  
Comments: This will further disrupt a quiet neighborhood and change its character to to an ongoing carnival! Please prevent this from happening!
- 
72. Name: Lance Mellon on 2020-06-02 18:46:25  
Comments: This is harmful to the environment. The fields have operated fine without artificial lights for years and can do so going forward without this.
- 
73. Name: Lori Ziemba on 2020-06-02 19:12:52  
Comments: NO 5G, NO lights!
- 
74. Name: Donald Ciccone on 2020-06-02 19:32:42  
Comments:
- 
75. Name: Tina zhu on 2020-06-02 20:14:43  
Comments:
- 
76. Name: Tracy Ashton on 2020-06-02 21:19:07  
Comments:
- 
77. Name: Kelsey Koch on 2020-06-02 22:19:17  
Comments:
- 
78. Name: Susan rivadeneyra on 2020-06-02 23:05:05  
Comments:
- 
79. Name: Jim Kurpius on 2020-06-02 23:10:00  
Comments: 90ft light towers in the neighborhood, 150+ nights a year, til 10pm? S.I. has no respect for the community.
- 
80. Name: Shirley Yee on 2020-06-02 23:49:13  
Comments: The addition of the stadium lights will be a disruption to our home life. Extending practice into the night is an expansion of the use of the field. The noise at night will be a distraction for our family. This project only benefits SI.
- 
81. Name: Kellyx Nelson on 2020-06-03 00:06:06  
Comments: Planning Commissioners, please authentically hear our concerns. I have never opposed a project in this neighborhood until now. We are deeply concerned about the impacts of these lights to our community. Please do not allow this intensified use and these structures that are obscenely out of scale for our residential neighborhood. Thank you.

- 
82. Name: Peter A Koch on 2020-06-03 00:28:08  
Comments: Thanks
- 
83. Name: Michele Willson on 2020-06-03 00:34:22  
Comments: The negative impact on our family oriented neighborhood would be too great!  
NO 5G. No Lights.
- 
84. Name: Meredith Kurpius on 2020-06-03 00:59:01  
Comments: SI has continues to increase its negative impact on the community and at the same time contends it provides a benefit. We used to use the pool, which was allowed based on community benefit but SI has revoked almost all access. The Planning Commission should specifically ask SI to articulate what the benefit to the community would be, especially given such a big impact.
- 
85. Name: Alice Chan on 2020-06-03 02:50:13  
Comments:
- 
86. Name: Michael Yuan on 2020-06-03 02:51:21  
Comments:
- 
87. Name: Lisa Struck on 2020-06-03 04:57:04  
Comments:
- 
88. Name: Melissa Choy on 2020-06-03 05:05:16  
Comments:
- 
89. Name: Sandra Shew on 2020-06-03 05:15:04  
Comments:
- 
90. Name: Daniel Luangthaingarm on 2020-06-03 05:38:46  
Comments:
- 
91. Name: Serena Llamera on 2020-06-03 06:02:58  
Comments:
- 
92. Name: Brian McBride on 2020-06-03 06:40:32  
Comments: The light are much too tall, lights are too bright st night, and cell signals are .uch too l intrusive to the neighborhood. Also, neighbors should be allowed use of the field. Parking on the surrounding streets will be impacted l to evening hours,as well.

No thank you

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93. Name: Steve Wang on 2020-06-03 14:09:22  
Comments: I strongly oppose the installation of four permanent stadium lights!!
- 
94. Name: Virginia Sturken on 2020-06-03 16:30:52  
Comments:
- 
95. Name: Shirley Recipon on 2020-06-03 17:03:30  
Comments: I ask SI to consider the example of citizenship, compromise and community they are setting for their students as they fail to consider the impact of their actions on the neighborhood community at large.
- 
96. Name: Steven Struck on 2020-06-03 17:07:32  
Comments: The addition of the stadium lights will be a disruption families along with unwanted noises. This only benefits SI, not families in the community.
- 
97. Name: Joanne Lee on 2020-06-03 17:10:37  
Comments:
- 
98. Name: David Davies on 2020-06-03 17:47:36  
Comments:
- 
99. Name: Adlai Manzo on 2020-06-03 17:58:52  
Comments: I think the lights should not be put on SI. I think this because the lights poles would be visible at almost everywhere. One piece of evidence is that my mom showed me drawing of where the lights poles would be. The shining area is just about everywhere. This is important because people trying to sleep would have light in their rooms, even at night, which would be very annoying to old people and when i'm on my roof deck looking thru our telescopes the light would be very annoying. Another piece of evidence is there is also going to be a 5g tower, too. This is important because 5g is might not be safe and may cause various diseases. Therefore my caim is correct because the lights would be just about everywhere and the 5g tower could pose a possible risk to cancer.
- This comment was written by APG student Adlai Manzo.  
If you wish to reply, go to [Admanzo@s.sfusd.edu](mailto:Admanzo@s.sfusd.edu)
- 
100. Name: Derek Tan on 2020-06-03 18:01:14  
Comments:
- 
101. Name: Yuriko Kearns on 2020-06-03 18:06:26  
Comments:
- 
102. Name: laura treinen on 2020-06-03 18:07:50

Comments:

- 
103. Name: Philip Hung on 2020-06-03 18:13:29  
Comments:
- 
104. Name: Damian A Nunez on 2020-06-03 19:08:38  
Comments: No Lights Please!!! Share....
- 
105. Name: John Rueppel on 2020-06-03 19:09:56  
Comments: I support keeping this neighborhood in its current state, without giant towers blocking everyone's view and drowning out the stars at night.
- 
106. Name: Natalie Tam on 2020-06-03 19:42:32  
Comments: We should respect the neighbors
- 
107. Name: Duncan Lee on 2020-06-03 19:45:24  
Comments:
- 
108. Name: Isabelle Hurtubise on 2020-06-03 20:00:13  
Comments: One of these 90 foot light poles will be directly in front of my bedroom window. The light will be a huge disruption to our evenings - dinnertime, homework and bedtime. I am even more concerned about the additional noise, traffic and litter from nighttime crowds in our quiet residential neighborhood. It is challenging enough getting little ones to bed on time. In addition, our four year old often plays ball or rides his bike across the street before bedtime, and he could not do this with the evening crowds. These enormous lights would significantly reduce our everyday quality of life. Please deny the permit or, at a minimum, order SI to publish a sufficiently detailed plan so we can ensure mitigation of the detrimental impact on our quiet residential neighborhood.
- 
109. Name: Jerry Woo on 2020-06-03 20:37:35  
Comments: No stadium lights in residential area.
- 
110. Name: Harry on 2020-06-03 20:42:31  
Comments:
- 
111. Name: Marykathleen stock on 2020-06-03 20:45:13  
Comments:
- 
112. Name: Patrick Schlemmer on 2020-06-03 21:10:44  
Comments: I do not want these bright lights in my neighborhood.
- 
113. Name: Georgiann Cota on 2020-06-03 21:25:35  
Comments:

- 
114. Name: Karen DeMartini on 2020-06-03 22:09:19  
Comments:
- 
115. Name: Cecily Ina-Lee on 2020-06-03 22:43:24  
Comments: NO STADIUM LIGHTS!!!
- 
116. Name: Carol Lawson on 2020-06-03 22:44:27  
Comments:
- 
117. Name: Jan Rhoades on 2020-06-03 22:48:58  
Comments: No to stadium lights.
- 
118. Name: Jonathan Maguire on 2020-06-03 22:54:04  
Comments:
- 
119. Name: Tracy Ingersoll on 2020-06-03 23:05:01  
Comments:
- 
120. Name: Katherine Cantwell on 2020-06-03 23:42:33  
Comments:
- 
121. Name: David Ferguson on 2020-06-03 23:51:17  
Comments: These light will infringe on people's peace and enjoyment.
- 
122. Name: Roger Wong on 2020-06-04 00:38:13  
Comments: Nightly disruption of the residential neighborhood families and sleeping patterns is not worth playing ball that late.
- 
123. Name: Kerrie Marshall on 2020-06-04 01:15:45  
Comments:
- 
124. Name: Diane on 2020-06-04 01:22:26  
Comments:
- 
125. Name: Fiona Lee on 2020-06-04 01:29:49  
Comments:
- 
126. Name: Jennifer Irvine on 2020-06-04 02:36:02  
Comments:
- 
127. Name: Donna Bruno on 2020-06-04 02:38:23

Comments: These light stands are MUCH too tall. The number of proposed nighttime events is far too many. No to this project!!

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128. Name: Grace tsai on 2020-06-04 03:26:41  
Comments:

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129. Name: Mike Foti on 2020-06-04 03:50:05  
Comments: NO lights please.

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130. Name: Brendan Kenneally on 2020-06-04 03:53:25  
Comments: The number of nights of proposed use is 150 and the use of the lights is being requested until 10 pm. Please ask yourself if you would want this across the street from your home. No permanent lighting should be approved.

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131. Name: Marian Ritchie on 2020-06-04 04:12:20  
Comments: No 5G in this neighborhood please!  
Certainly this magnitude of lighting is not necessary!  
Please reconsider! THANK YOU@

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132. Name: Jacob Wang on 2020-06-04 04:12:26  
Comments:

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133. Name: Teo Manzo on 2020-06-04 04:12:45  
Comments: I don't want Any Lights and having to deal with night games

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134. Name: Stanley Chan on 2020-06-04 04:21:15  
Comments: No lights = minimal night games = peaceful and quiet neighborhood. There is no misconception of the project, there should be a new traffic and parking studies. The additional lights shifts the use of main field to later times in the day/week, so how does it not affect parking/traffic? Do not get deceived by SI's letter.

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135. Name: Anonymous on 2020-06-04 04:37:21  
Comments:

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136. Name: Emily Osterstock on 2020-06-04 06:08:51  
Comments:

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137. Name: Mari Ho on 2020-06-04 06:17:16  
Comments: I am a regular at this spot for the last 12 yrs and deeply concern about these bright lights, not eco friendly to the animals, ie: birds, people, pets. I know noise, traffic and light are polutions that we don't need in a residential neighborhood. I'm a gardener and I think those lights will throw off the life-cycles of my plants. If my flowers don't flower and my fruits don't fruit what will I do????

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138. Name: Joy Chan on 2020-06-04 07:57:29  
Comments: We object the lights and cell tower. Several comments on SI's May 27 letter - they stated "night games/practices are not intended to intensify the use of the lower field." How can they guarantee they will not use the field more? When they have the lighted field, they will plan even more games, events, and allow use by their affiliates. Also SI stated " the addition of lights is not to expand the use of the main field but shift the existing uses to later times, meaning night times. Isn't that even worse? We do not want lights brighten up the skyline and noise disrupting our neighborhood at night. In additional, SI stated " it will benefit the neighborhood by holding games on Friday nights instead of Saturday afternoon. We cannot understand how this can be a benefit, we do not want to come home after a long day of work and still need to find parking, hear all the noise and experience the light pollution disrupting our restful night. Moreover, SI stated "there will not be an expansion of any noise associated with practices and games", we do not see that possible, with night time games, noise will be more apparent than during the day, and they are going to have a new sound system too!. Lastly, SI tried to compare the game capacity with the number of people on campus for a typical school day, that is totally two different points. Not all students drive to school and during games, families, friends and relatives, mostly will drive, even if carpool, imagine 2000 attendees equal to 500+ cars in this quiet residential neighborhood, will it be quiet and peaceful as it should be? We doubt. With all of these comments, we continue to strongly oppose this project!

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139. Name: lei zhu on 2020-06-04 07:57:48  
Comments:

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140. Name: Mimi Leung on 2020-06-04 13:37:20  
Comments:

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141. Name: Taslim Rashid on 2020-06-04 13:47:55  
Comments:

---

142. Name: Minerva Tico on 2020-06-04 14:17:14  
Comments:

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143. Name: Vicki Tomola on 2020-06-04 16:27:48  
Comments: Please listen & truly consider what the people living in this neighborhood are saying, their concerns, how their lives, homelife, their health and childrens health from esposure to electromagnetic waves, will be affected by this SELFISH SI institution that has never shown any form of respect for the the people living in this community, past and present.  
I remember a sand lot,  
I remember when the students didn't take over all the parking ( & why hasn't the city made the school supply a parking lot)  
This institution has been poisoning the neighborhood for 30+ years  
If this is truly a democratic city than the people living in this community have a powerful say in what is best for thier neighborhood.

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144. Name: Daniel Dooling on 2020-06-04 16:35:54  
Comments: Pleas listen, consider and join with the people of the neighborhood and do what is right for the residents of this community.
- 
145. Name: Millie Fish on 2020-06-04 16:59:20  
Comments:
- 
146. Name: Nicole on 2020-06-04 17:12:14  
Comments:
- 
147. Name: Benja kew on 2020-06-04 17:44:28  
Comments:
- 
148. Name: Lauraine Edir on 2020-06-04 18:05:32  
Comments:
- 
149. Name: Ellen Scanlan on 2020-06-04 18:16:21  
Comments: Light pollution is a global problem.
- 
150. Name: Dianne Alvarado on 2020-06-04 18:26:22  
Comments:
- 
151. Name: Janine Wilburn on 2020-06-04 18:39:13  
Comments: NO Thank you! I am extremely surprised and disappointed that St. Ignatius would be so dismissive of the community the school resides within. I can not understand how a Catholic school can be so uncaring. It The extra pollutants from the noise, bright lights and traffic are the opposite of Cura Personalis, care for the whole person. How does this action teach the young people attending the school the important Jesuit Values?
- 
152. Name: Albert Ma on 2020-06-04 20:29:10  
Comments:
- 
153. Name: Garlen Chan on 2020-06-04 20:33:59  
Comments:
- 
154. Name: Agnes V on 2020-06-04 20:40:17  
Comments:
- 
155. Name: Vincent T on 2020-06-04 20:40:59  
Comments:
- 
156. Name: Maria Vengerova on 2020-06-04 20:45:07

Comments: Bright light, 5G, mass sport events, and disturbing noise are incompatible with the uniqueness of our residential neighborhood that is so close to the nature and wildlife, and is a home to the hard-working people, hard-working homeowners and renters. We deserve peace and respect.

---

157. Name: Lauren Carara on 2020-06-04 21:13:13  
Comments: Not necessary!

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158. Name: Larry Yee on 2020-06-04 22:29:57  
Comments: I feel that the lights being up until 10pm for "practices" only encourages the students to stay up later, when they should be at home doing homework.

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159. Name: Jake Koch on 2020-06-05 00:55:29  
Comments: No to lights at SI

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160. Name: Karen on 2020-06-05 01:05:31  
Comments:

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161. Name: M O'Sullivan on 2020-06-05 01:53:54  
Comments:

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162. Name: Jodie Young on 2020-06-05 01:56:54  
Comments:

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163. Name: Jonathan Vitug on 2020-06-05 02:02:09  
Comments:

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164. Name: Bunny Bedell on 2020-06-05 02:37:26  
Comments:

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165. Name: Nancy Murphy on 2020-06-05 02:48:19  
Comments:

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166. Name: Danielle on 2020-06-05 03:52:04  
Comments:

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167. Name: Gilbert Lam on 2020-06-05 03:56:46  
Comments:

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168. Name: Amy Mc Manus on 2020-06-05 04:00:13  
Comments: We don't want anymore light pollution. The lights at the soccer fields in GG Park are bad enough. Doesn't anybody like to look at the stars anymore?

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169. Name: Mary Jones on 2020-06-05 05:05:51  
Comments: Too tall!!! Too bright!!!
- 
170. Name: Erin Aulner on 2020-06-05 07:28:09  
Comments:
- 
171. Name: Erin Armstrong on 2020-06-05 07:37:27  
Comments:
- 
172. Name: Rosalie Friedman on 2020-06-05 17:16:43  
Comments:
- 
173. Name: Louise Jonas on 2020-06-05 17:19:08  
Comments: I oppose thinking the demands on high school students are high enough already. More light pollution is also undesirable.
- 
174. Name: Jack Allen on 2020-06-05 23:43:16  
Comments: No lights at SI please
- 
175. Name: Michael Ma on 2020-06-06 00:41:47  
Comments:
- 
176. Name: Robert Lagomarsino on 2020-06-06 00:44:59  
Comments: My family has owned our 39th Ave home since 1948. We live literally across the street from the football field & one of the proposed 90' light towers. Growing up, this residential neighborhood was so quiet & peaceful (with a sandlot across the street). Then SI opened up in 1969. For over 50 years my neighborhood has tried to coexist with the school. Parking has always been an issue when school is in session. Congestion, noise & trash from time to time. These issues will only be magnified with evening usage of the football field & the massive light towers. SI sent a postcard to the neighbors showing that the proposed lights will be used 200 nights per school year. This would be a major disruption to the peace & quiet of our family oriented Sunset neighborhood. Another issue that no one I think has brought up is our property values. Will they be adversely affected by these issues of increased noise, no parking, more congestion, light pollution? Home buyers might reconsider in our neighborhood thus driving down market values. It's something to think about. Bottom line is that I'm opposed to this project.
- 
177. Name: Michele Gachowski on 2020-06-06 05:47:21  
Comments:
- 
178. Name: Cynthia Skinner on 2020-06-06 09:35:09  
Comments:

- 
179. Name: Alex on 2020-06-06 16:38:30  
Comments: I agree not to put up the lights, at the school normal days sometimes the students car block my drive way and at game days even worse, people from outside leave trash, drive by make loud noise, terrifies our quiet neighbors
- 
180. Name: Roger Roldan on 2020-06-06 18:48:47  
Comments: I can't believe the level of corruption we have in the city to allow such a project that only hurt the community. I am so upset that our representatives and the people who is in charge of the planificación is the city, have gone ahead with this project. In addition to hurt enormously our environment that include light contamination, birds migration and local wildlife, this project will bring only problems to our neighborhood. We don't need more games, more people arriving in big quantities to fill up our streets, more noise, more cars, more violence. Our children are able to walk to the park safely ow and that will be imposible with this project.
- 
181. Name: Michelle Tam on 2020-06-06 21:21:18  
Comments:
- 
182. Name: Elaine Mina on 2020-06-06 23:37:37  
Comments:
- 
183. Name: Yvonne Daubin on 2020-06-06 23:55:35  
Comments: I strongly oppose this.
- 
184. Name: Sadaf Mir on 2020-06-06 23:57:31  
Comments:
- 
185. Name: Andrew Sohn on 2020-06-07 02:01:48  
Comments:
- 
186. Name: Michael Murphy on 2020-06-07 02:44:13  
Comments: This project is of no benefit to the community.
- 
187. Name: Crystal Stermer on 2020-06-07 05:13:15  
Comments:
- 
188. Name: Michael Bourne on 2020-06-07 05:18:16  
Comments: No lights! No cell tower!
- 
189. Name: Kelly Le on 2020-06-07 05:28:02  
Comments:
-

190. Name: Melinda on 2020-06-07 07:29:16  
Comments: No to this lighting and NO to 5g. This is going to change the neighborhood in ways that are detrimental to the bird and animal populations and to the humans too. 5g is proven to be a very bad idea and will harm for generations to come

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191. Name: Kevin Sun on 2020-06-07 16:28:21  
Comments:

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192. Name: Lindsay Johnson on 2020-06-08 04:24:05  
Comments: I oppose

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193. Name: Kevin Johnson on 2020-06-08 04:25:00  
Comments: I live on 35th Ave and I am in opposition of this project

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194. Name: anonymous on 2020-06-08 06:57:21  
Comments:

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195. Name: Jay Manzo on 2020-06-08 06:58:04  
Comments: I strongly oppose this project:  
1) Speaking as an architect, this project is completely out of scale with the surrounding residential neighborhood and will be an eyesore. It does a disservice to the community and city by imposing such out of scale and inappropriate structures. 2) It does not serve the community or neighborhood. SI is a private school and the lights will be on to 10pm degrading the public environment with light pollution 200 nights a week. 3) Night games will only bring more traffic and noise and pollution to a residential area seriously degrading our neighborhood peace and health. 4) Light pollution will further degrade our ability to see and appreciate the stars in this area of the city which is known for having darker skies.

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196. Name: Jane Doe on 2020-06-08 06:58:23  
Comments:

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197. Name: anonymous on 2020-06-08 07:01:39  
Comments:

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198. Name: Yolanda Lee on 2020-06-08 16:36:48  
Comments:

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199. Name: Vicky lee on 2020-06-08 16:38:41  
Comments:

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200. Name: Anita Lee on 2020-06-08 16:39:10  
Comments:

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201. Name: William Huang on 2020-06-08 16:40:59  
Comments:

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**APPENDIX 3**

**APRIL 29, 2020 PRE-APPLICATION MEETING ZOOM CHAT LOG**

**This document is a direct copy/paste of chats recorded on Zoom at the 04/29/2020 Saint Ignatius Neighborhood Meeting to discuss the proposed stadium lighting project.**

**Some minor editing has been done where edits were obvious (spelling, etc.). A few clarifications have been added in this format: [text]**

**Names have been deleted to protect the privacy of individuals, and have been replaced with xxxxxxxx**

-----  
From xxxxxxxx to Everyone: 06:06 PM

will the microphones be unmuted at any point to hear what neighbors would like to say?

From xxxxxxxx to Everyone: 06:06 PM

The PUC's Sunset Boulevard Greenway Project highlighted the Blvd. as a pollinator migratory path. What will the impact be on this investment?

From xxxxxxxx to Everyone: 06:06 PM

I guess we have to sit through the public relations and all the spin, even though the majority of neighbors are against "Change in Use" and private benefit with all cost to public and neighborhood.

From xxxxxxxx to Everyone: 06:10 PM

Is it possible later to get the location of this type of lighting in the city for the community to review: night lighting, fog, wet surfaces etc thx

From xxxxxxxx to Everyone: 06:11 PM

I live right across the street. The view is going to be bad!!!

From xxxxxxxx to Everyone: 06:11 PM

MAYBE Beach Chalet in Golden Gate Park but I'm not so sure.

From xxxxxxxx to Everyone: 06:13 PM

No matter the technology, it still doesn't make this a public benefit. If this were a public field I would not object. It's not public. Still have increased parking, traffic, and noise - period, more use, change in use.

From xxxxxxxx to Everyone: 06:13 PM

This is not a public field!!! Only will be used by SI and those connected with their sports/extracurricular programs!

From xxxxxxxx to Everyone: 06:14 PM

Will those lights at Margaret Hayward be operating in this pandemic?  
for us to view them in action

From xxxxxxxx to Everyone: 06:14 PM

The Arizona project had neighbors further away than this project. Like across the a very big street.

From xxxxxxxx to Everyone: 06:14 PM

Keep spinning it, SI. How much time will be dedicated to actual public feedback in this meeting?

From xxxxxxxx to Everyone: 06:14 PM  
we heard all this at past meetings. our point is not the equipment . We do not want our residential neighborhood disrupted

From xxxxxxxx to Everyone: 06:15 PM  
tom, regardless of the technology, what neighbors are most concerned about is the fact that the permit is for 150 days and until 10 pm, please address this issue

From xxxxxxxx to Everyone: 06:15 PM  
please make sure there is enough time to allow Q&A. That is the main purpose of the meeting.

From xxxxxxxx to Everyone: 06:15 PM  
that's just a drawing - not actual

From xxxxxxxx to Everyone: 06:16 PM  
How about an existing aerial view from the other installation in the filmier [Filmore?]

From xxxxxxxx to Everyone: 06:16 PM  
Can you post the link to the lighting examples and planning commission submission?

From xxxxxxxx to Everyone: 06:16 PM  
Filmore Park area

From xxxxxxxx to Everyone: 06:16 PM  
Just go to the fields where your lights are being used. Way more bleed.

From xxxxxxxx to Everyone: 06:16 PM  
15 mins on just light fixtures

From xxxxxxxx to Everyone: 06:16 PM  
it really seems like we're not having a choice in this

From xxxxxxxx to Everyone: 06:17 PM  
did they have an agenda?

From xxxxxxxx to Everyone: 06:17 PM  
It doesn't seem like they want to answer questions.

From xxxxxxxx to Everyone: 06:17 PM  
with the revenue SI is going to receive every month through the 5G tower, how much of that revenue will be provided to local community benefits?

From xxxxxxxx to Everyone: 06:18 PM  
this is more a presentation than a chance for discussion!

From xxxxxxxx to Everyone: 06:18 PM

tom, will this recording be shared to the association?

From xxxxxxxx to Everyone: 06:18 PM

This is SI's "field" here for sure - It's a pretend we're concerned about the Sunset folks

From xxxxxxxx to Everyone: 06:18 PM

Is the moderator for this meeting from planning or from SI?

From xxxxxxxx to Everyone: 06:16 PM

we should screen shot all these chat messages, see how much they will address, should show SF planning this meeting did not meet its intent.

From xxxxxxxx to Everyone: 06:16 PM

It would be great to have this presentation recorded and shared.

From xxxxxxxx to Everyone: 06:16 PM

It's being recorded

From xxxxxxxx to Everyone: 06:16 PM

I am not very interested to the technology. I just want to discuss the unhappiness of the community.

From xxxxxxxx to Everyone: 06:16 PM

Why can't Verizon put their cell tower on SI's roof with the other cell tower they have?

From xxxxxxxx to Everyone: 06:20 PM

As they said, this meeting is mandated by the City as part of their proposal. It is being recorded and I hope will be shared in full with the City

From xxxxxxxx to Everyone: 06:20 PM

How about open access to fields? Pool and free data plans for the community. ;0)~

From xxxxxxxx to Everyone: 06:20 PM

Is meeting being recorded and will transcription be available?

From xxxxxxxx to Everyone: 06:20 PM

This installation has no benefit except for SI

From xxxxxxxx to Everyone: 06:20 PM

<https://www.google.com/maps/@33.6386422,-111.8718035,766m/data=!3m1!1e3>

[Notre Dame Preparatory High School in Arizona]

From xxxxxxxx to Everyone: 06:21 PM

the recording light is on the upper left so this is being recorded - whether they will share is the question

From xxxxxxxx to Everyone: 06:21 PM

It has no benefit for the community. Are they spinning Verizon is the real reason? There are telephone poles all around that can be leveraged.

From xxxxxxxx to Everyone: 06:21 PM

The purpose of attending the meeting is to have a discussion and hear all voices from the neighbors!

From xxxxxxxx to Everyone: 06:22 PM  
Are these cellular signals bad for our health?

From xxxxxxxx to Everyone: 06:22 PM  
A link to the Arizona school [see link above]

From xxxxxxxx to Everyone: 06:22 PM  
Verizon could use public field poles or SI roof. They don't need these specific poles nor light poles nor night lights

From xxxxxxxx to Everyone: 06:22 PM  
sorry, SI is a private entity, not having cellular reception can be resolved by other means

From xxxxxxxx to Everyone: 06:22 PM  
It looks like the only benefit of the tower is for the baseball [football] field

From xxxxxxxx to Everyone: 06:22 PM  
i.e. femotocell  
voice over wifi

From xxxxxxxx to Everyone: 06:22 PM  
The grey holes are Sunset Blvd! [referring to one of Verizon's color maps of cell coverage]

From xxxxxxxx to Everyone: 06:22 PM  
what about AT&T, T-Mobile?

From xxxxxxxx to Everyone: 06:22 PM  
The light poles will be a big light pollution problem for us in the future.

From xxxxxxxx to Everyone: 06:23 PM  
the "hole" is sunset blvd and fields [referring to one of Verizon's color maps of cell coverage]

From xxxxxxxx to Everyone: 06:23 PM  
I live in a "grey" house and have wonderful reception. Perhaps this is device dependent?

From xxxxxxxx to Everyone: 06:23 PM  
you mean the baseball field?

From xxxxxxxx to Everyone: 06:23 PM  
if I have coverage problem at home, does it mean Verizon will erect a cell tower in my house?

From xxxxxxxx to Everyone: 06:23 PM  
Does ATT and other carriers get to use SI poles?

From xxxxxxxx to Everyone: 06:23 PM  
again, it just basically covers the baseball [football] field

From xxxxxxxx to Everyone: 06:23 PM  
ATT works there

From xxxxxxxx to Everyone: 06:24 PM  
Fine - that's a separate issue from change in use with lights added to the field for a private benefit, accountable to the Ignatian Corporation board of directors

From xxxxxxxx to Everyone: 06:25 PM  
cell reception issue?

From xxxxxxxx to Everyone: 06:25 PM  
there will be 4 of these. Note scale

From xxxxxxxx to Everyone: 06:26 PM  
We need to move forward with requiring neighborhood parking permits.

From xxxxxxxx a to Everyone: 06:26 PM  
what an eyesore!

From xxxxxxxx to Everyone: 06:26 PM  
We have a 6 month baby directly across from SI - we DO NOT want 5G this close to our home. What are the health issues related to 5G?

From xxxxxxxx to Everyone: 06:26 PM  
So can't Verizon just erect 1 pole for antennas?

From xxxxxxxx to Everyone: 06:27 PM

directly in front of my house

From xxxxxxxx to Everyone: 06:27 PM  
What affiliation does Jeffrey Horn have with SI?

From xxxxxxxx to Everyone: 06:27 PM  
there is already a AT&T Tower on the back of the SI school building for those with AT&T as a carrier.

From xxxxxxxx to Everyone: 06:27 PM  
disclosures for all those involved in organizing should be provided

From xxxxxxxx to Everyone: 06:26 PM  
Why not upgrade the existing equipment rather than adding more?

From xxxxxxxx to Everyone: 06:26 PM  
Why would the equipment not be installed in the middle of SI property, not adjacent to the neighborhood?

From xxxxxxxx to Everyone: 06:26 PM  
Please read SI's answer

From xxxxxxxx to Everyone: 06:26 PM  
Isn't there a recommendation on how far these antennas should be away from school/children?

From xxxxxxxx to Everyone: 06:30 PM  
how and what disruptions are caused.

From xxxxxxxx to Everyone: 06:30 PM  
So, the answer is yes. They could place them on the buildings

From xxxxxxxx to Everyone: 06:30 PM  
That equipment will have cooling elements (likely fans) that keep equipment at temp. An assumption, but something else to consider moving the equipment into the middle of SI.

From xxxxxxxx to Everyone: 06:31 PM  
tom/SI can you please disclose what the \$ benefit to SI is in partnering with Verizon in terms of either leasing the space for the attend [antenna], or what they are contributing to the cost of your stadium line project?

From xxxxxxxx to Everyone: 06:31 PM  
Can you move cell tower to closer to the SI?

From xxxxxxxx to Everyone: 06:31 PM  
Seems like they're more concerned with their own disruptions on campus rather than their disruption to the neighborhood.

From xxxxxxxx to Everyone: 06:31 PM  
light project. Also could the attend [antenna] be placed on the schools side as opposed to the street side closer to neighbors?

From xxxxxxxx to Everyone: 06:31 PM  
SI doesn't care about coverage. This is about money that they get from the carriers. Still isn't addressing the change of use and how it affects the neighborhood: parking, traffic and light pollution.

From xxxxxxxx to Everyone: 06:31 PM  
Reduces. They show no light

From xxxxxxxx to Everyone: 06:32 PM  
In the City's Master plan of 8 points, two of them absolutely do not demonstrate compliance or benefit:  
(b) The following Priority Policies are hereby established. They shall be included in the preamble to the General Plan and shall be the basis upon which inconsistencies in the General Plan are resolved: (2) That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods; Lighting on the field and the increased use of the field, including increases in parking, traffic, noise and light pollution will no doubt change the character of our neighborhood. (8) That our parks and open space and their access to sunlight and vistas be protected from development.

From xxxxxxxx to Everyone: 06:32 PM  
Has there been a lighting pollution study regarding the lights in all types of weather?

From xxxxxxxx to Everyone: 06:32 PM  
How about drone footage of their new install, not a simulation.

From xxxxxxxx to Everyone: 06:33 PM  
Why should SI have the only lighted high school football?

From xxxxxxxx to Everyone: 06:33 PM  
after school will go til 10pm?

From xxxxxxxx to Everyone: 06:33 PM  
So, does that mean your sporting practices won't start blowing their whistles at 7 AM M-F?

From xxxxxxxx to Everyone: 06:33 PM  
Students don't go school on Saturday

From xxxxxxxx to Everyone: 06:33 PM  
Pushes the noise level for neighbors later.

From xxxxxxxx to Everyone: 06:33 PM  
we live with almost 500 cars parked in the neighborhood because of SI.

From xxxxxxxx to Everyone: 06:33 PM  
You said this many times before, we don't need to hear it again [referring to something Tom Murphy said]

From xxxxxxxx to Everyone: 06:33 PM  
So, it means to make noise until late night.

From xxxxxxxx to Everyone: 06:33 PM  
but won't that the field be leased out to other non-SI schools, events and programs?

From xxxxxxxx to Everyone: 06:34 PM  
You rent out the field every weekend.

From xxxxxxxx to Everyone: 06:34 PM  
I don't want that Big Ugly Pole on my 36th Ave. Block.

From xxxxxxxx to Everyone: 06:34 PM  
What is the benefit of starting school later if the children will be awake even later? What guidelines have the American Academy of Pediatrics released in support of this late evening?

From xxxxxxxx to Everyone: 06:34 PM  
and all the other schools in the city? what about weekends for evenings and neighbors.

From xxxxxxxx to Everyone: 06:34 PM  
then you don't care about your neighbors resting hour. just concerned about your students

From xxxxxxxx to Everyone: 06:34 PM  
Forced = \$

From xxxxxxxx to Everyone: 06:34 PM  
Remember when they offered us tickets to their games? What a joke

From xxxxxxxx to Everyone: 06:35 PM  
10 out of 15 sports have no need for the JB Murphy field - basketball, volleyball, golf, cross country, tennis, waterpolo, rowing, softball, swim & diving, baseball

From J xxxxxxxx to Everyone: 06:35 PM  
The double parking will be a major problem for us soon.

From xxxxxxxx to Everyone: 06:35 PM  
other high schools are coed and not lighting their fields

From xxxxxxxx to Everyone: 06:35 PM  
sports is extracurricular

From xxxxxxxx to Everyone: 06:35 PM

This only benefits SI students. Sorry, this has nothing to do with how this benefits the neighborhood because it doesn't!

yes, it seems neighbors will get disruptions not SI but SI gets paid

From xxxxxxxx to Everyone: 06:35 PM

Why do I care about your school students?

From xxxxxxxx to Everyone: 06:35 PM

The rest of us fit in sports programs before it is dark.

From xxxxxxxx to Everyone: 06:35 PM

SI doesn't care about us Sunset Parkside neighborhood.

From xxxxxxxx to Everyone: 06:35 PM

what fraction of the student body lives in the adjacent community?

From xxxxxxxx to Everyone: 06:35 PM

maybe it's time to end the football program out of safety for the students as student safety is the school's highest priority. Then there's no need for the lights.

From xxxxxxxx to Everyone: 06:35 PM

You get the benefit, but we are suffering???

From xxxxxxxx to Everyone: 06:35 PM

Our neighborhood all around what I call the "Big Block," composed of SI, West Sunset Fields, Ortega Park, and AP Gianni, is unique in that all the power lines, phone and cable lines are buried, leaving a very unique and clean appearance. The vistas looking out from various points in the neighborhood towards the Pacific and up towards Mt. Tamalpais are marvelous. Having 60 foot light poles will degrade these views. Point 8 mentions "sunlight" but it should also include "night sky" as the light would only degrade the area with additional light pollution. [note, poles will be 90-foot].

From xxxxxxxx to Everyone: 06:35 PM

perhaps they should use shuttles and not park in our spaces

From xxxxxxxx to Everyone: 06:36 PM

Our block will be petitioning to have restricted lettered parking.

From xxxxxxxx to Everyone: 06:36 PM

Fit in more hours of sports and further disrupt the neighborhood.

From xxxxxxxx to Everyone: 06:36 PM

not important enough to disrupt lives of people who live here and invested in the neighborhood

From xxxxxxxx to Everyone: 06:36 PM

You obtained a permit with limited sports. Why should we give up our parking to support your programs.

From xxxxxxxx to Everyone: 06:36 PM

having permitted parking doesn't help

From xxxxxxxx to Everyone: 06:36 PM

They are using VERIZON for leverage!!!

From xxxxxxxx to Everyone: 06:36 PM

What makes you a good neighbor?

From xxxxxxxx to Everyone: 06:37 PM

SI is just burning up time to avoid questions

From xxxxxxxx to Everyone: 06:37 PM

someone please post information to join neighborhood association

From xxxxxxxx to Everyone: 06:37 PM

Seems like you can answer questions now

From xxxxxxxx to Everyone: 06:37 PM

Saint Ignatius has regularly been renting out use of the JB Murphy field over the 12 years I have lived here to SF Elite Academy Soccer Club, pee-wee football, Adult league Ultimate frisbee teams, etc. The fact is that this proposal is only a benefit to a private entity, the Ignatian Corporation, where the public is being asked to carry the burden of the costs.

From xxxxxxxx to Everyone: 06:37 PM

When will there be time for a Q and A for the community? Can that be scheduled for after the pandemic when face to face communication allows for that?

From xxxxxxxx to Everyone: 06:37 PM

This should be postponed until a proper in person public hearing.

From xxxxxxxx to Everyone: 06:37 PM

Thanks Tom for a really good presentation

From xxxxxxxx to Everyone: 06:38 PM

this is not a true meeting then if there is no Q&A from the neighbors, if there is no actual dialogue

From xxxxxxxx to Everyone: 06:38 PM

SI ignores the neighbors and only concern their students and force the neighbors to accept their idea.

From xxxxxxxx to Everyone: 06:38 PM  
these questions we asked are issues that will arise after the lights are installed. So they should be addressed by the project.

From xxxxxxxx to Everyone: 06:38 PM  
Not questions, unhappy sunset residents

From xxxxxxxx to Everyone: 06:38 PM  
We have 22 minutes

From xxxxxxxx to Everyone: 06:38 PM  
the school has been there for 50 years. did you not notice it when you bought your home?

From xxxxxxxx to Everyone: 06:38 PM  
If you have so many sports programs that you can't fit in during daytime hours, the neighbors shouldn't have to pay the price in noise, parking, and light pollution!!

From xxxxxxxx to Everyone: 06:38 PM  
WE DON'T WANT THE LIGHTS PERIOD!!!!

From xxxxxxxx to Everyone: 06:38 PM  
No photometric study presented. No scale site context drawing of poles with houses. Please present those to the community.

From xxxxxxxx to Everyone: 06:38 PM  
How does this benefit all the resident around SI?

From xxxxxxxx to Everyone: 06:38 PM  
you haven't answered any of the questions in the chat!!

From xxxxxxxx to Everyone: 06:36 PM  
thanks! email sisunsetneighbors@hotmail.com to stay informed

From xxxxxxxx to Everyone: 06:36 PM  
define afflicted

From xxxxxxxx to Everyone: 06:36 PM  
You're saying don't buy houses near a school....?

From xxxxxxxx to Everyone: 06:36 PM  
Anticipating 150 days usage up to 10pm. Does that mean 3 week nights a week?

From xxxxxxxx to Everyone: 06:36 PM  
lived here 64 years = before SI here

From xxxxxxxx to Everyone: 06:36 PM  
you should provide written answers to the questions on the chat on your "good neighbor" site

From xxxxxxxx to Everyone: 06:36 PM  
We need to move forward with neighbor parking permits

From xxxxxxxx to Everyone: 06:36 PM  
how many nights will be lighted to 10 pm?

From xxxxxxxx to Everyone: 06:36 PM  
How many days a year will the light be on?

From xxxxxxxx to Everyone: 06:36 PM  
traffic mitigation plan?

From xxxxxxxx to Everyone: 06:36 PM  
it's not only about the light, it's about it is affecting everyone who lives around.

From xxxxxxxx to Everyone: 06:36 PM  
154 nights out of each year = about every other night

From xxxxxxxx to Everyone: 06:36 PM  
It could be postponed should you choose

From xxxxxxxx to Everyone: 06:36 PM  
environmental impact study?

From xxxxxxxx to Everyone: 06:40 PM  
20 minutes and not fielding questions?

From xxxxxxxx to Everyone: 06:40 PM  
Wow!

From xxxxxxxx to Everyone: 06:40 PM  
Disclosures

From xxxxxxxx to Everyone: 06:40 PM  
You said the meeting is for an hour, sounds like you are ending it now

From xxxxxxxx to Everyone: 06:40 PM  
They are wasting the times. All they talk about is the LIGHTING!!!!

From xxxxxxxx to Everyone: 06:40 PM  
wow... that's it...? steamrolled

From xxxxxxxx to Everyone: 06:40 PM  
The Next-door post titled "PLEASE READ - St. Ignatius Field Lighting Proposed Project" did not mention the ability to submit questions.

From xxxxxxxx to Everyone: 06:40 PM  
horrible project for the neighbors at all

From xxxxxxxx to Everyone: 06:40 PM  
you still have 20 minutes to address the neighborhood's concerns

From xxxxxxxx to Everyone: 06:40 PM  
please set another meeting for addressing all neighborhood questions and concerns

From xxxxxxxx to Everyone: 06:40 PM  
Noise impacts?

From xxxxxxxx to Everyone: 06:40 PM  
All things you have to pay for

From xxxxxxxx to Everyone: 06:40 PM  
The school was originally a boy's school, then their enrollment dropped. They pushed for the #48 muni line to come all the way from the east side of the city so they can recruit the students from the large number of catholic families there. Then, still not enough \$\$\$, changed to co-ed. Now, want to light up the field to rent out for more \$\$\$.

From xxxxxxxx to Everyone: 06:40 PM  
join [sisunsetneighbors@hotmail.com](mailto:sisunsetneighbors@hotmail.com) to stay informed

**[There may have been more chats not included here that may have been posted between 06:40 and when they abruptly shut down the call a few moments later]**

**APPENDIX 4**

**SAINT IGNATIUS SUMMARY OF DISCUSSION  
FROM PRE-APPLICATION MEETING HELD APRIL 29, 2020**

# Summary of Discussion from Pre-Application Meeting

Meeting Date: April 29, 2020

Meeting Time: 6 p.m.

Meeting Address: the meeting was held online using the Zoom meeting application with questions submitted in advance by meeting attendees.

Project Address: 2001 37<sup>th</sup> Avenue, SF, CA 94116

Project Owner: The Ignatian Corporation / St. Ignatius College Preparatory

Project Sponsor: Ken Stupi

The Zoom attendees, agenda of the meeting and related slides are attached. Presentations were made by Chad Christie representing Verizon wireless, Jasen Diez of Musco Lighting and Tom Murphy of St. Ignatius. Questions submitted by the attendees in advance of the meeting are listed below along with associated responses either from the meeting or as supplied after the meeting.

Summary: the project has not been modified as a result of any of these questions. SI has embarked on providing further clarification about the project including the nature of the planned use of the field when lights are in use and why the light poles have to be 90 feet tall.

Meeting Agenda:

- Quick welcome - Why are we here
- Verizon reviews cell tower details
- Musco reviews technology
- Address questions specifically about the project
- Meeting closes

## Questions Directed to Verizon / Musco

### 1. Question /Concern:

Why is the Verizon Wireless facility not considered a separate SF Planning action from S.I. Stadium Lights?

### Response:

We asked our planner, Jeff Horn, for the answer to this question. We cut and pasted his response and provided it to the SI Neighborhood Association (SINA). Mr. Horn's response was as follows:

This is a bit of a nuanced answer, so I hope this response is clear and can be conveyed to the neighbors.

The Project is being noticed and presented to the Commission as one project, since the features are related in regards to construction, and on the same subject property, and require the same approval (Conditional Use per PC Section 303(c)). The WTS will also have to meet additional

Findings for Conditional Use Authorization under PC Section 303(s).

The Planning Commission has discretion to make a decision on each of the individual CUA requests (The modification to a School in the RH-1 Zone (Light Standards) or the WTS with a RH-1 Zone) separately or on the project as a whole in one Motion.

**2. Question /Concern:**

It appears to us that S.I. is using this Verizon installation to push through a much larger impact project -- Permanent night time stadium lights.

**Response:**

SI has been working on this project for over 5 years, the Verizon cellular antennas have always been a part of the project.

**3. Question /Concern:**

Please explain why this specific new Verizon panel antenna(s) is considered essential under the current Covid19 restrictions?

**Response:**

Both the City of San Francisco and the Department of Homeland Security have deemed wireless communications an essential function during this time. In addition, the neighbors were told that the process for a CUP was begun prior to the shelter in place / Covid-19 pandemic and that we were following the new guidelines provided to us by the planning department. The neighbors requested further clarity from the planning department and were given this response on May 4, 2020:

The remote pre-application meeting is a new process alternative created in response to the current health crisis and the City's Shelter-in-Place Order which initially began on March 17, 2020. Prior to the health crisis, the Sponsor had noticed and was preparing to present an in-person Pre-Application meeting per (what had been) the established protocols.

The remote pre-application meeting is a new process alternative created in response to the current health crisis and the City's Shelter-in-Place Order which initially began on March 17, 2020. Prior to the health crisis, the Sponsor had noticed and was preparing to present an in-person Pre-Application meeting per (what had been) the established protocols.

**4. Question /Concern:**

Saint Ignatius already has a large number of cell towers installations on their existing campus buildings, are they functioning?

**Response:**

Verizon could not answer this question so SI responded. Yes, there are other cell sites on the SI buildings and they are functioning. There is no further room on the SI Academic Building and long term plans are for McGucken Hall to be demolished. Verizon did mention that the proposed location is optimal for their coverage needs.

**5. Question /Concern:**

If Verizon needs to upgrade cell coverage in our area, why can't these new antennas be installed on an existing building at SI – where the other ones are located?

**Response:**

See response to question #4.

**6. Question /Concern:**

Has Verizon looked at the existing lighting installed two fields over which are owned and managed by SF Park and Rec?

**Response:**

The poles located on the Park & Rec property have been looked at and are too short for Verizon's needs and the location does not provide as much coverage as the SI location.

**7. Question /Concern:**

Why does Verizon need the 90 ft stadium lights/poles for this wireless communication facility?

**Response:**

The Verizon antennas are located 60 feet above the ground on the 90 foot poles. The height of the poles is dictated by SI. SI responded with the need for the 90 foot poles is to place the light fixtures at a height that would generate the least amount of light spillage onto the surrounding neighborhood.

**8. Question /Concern:**

How do you plan to get around the planning code's explicit 40-ft height restriction for this area with the proposed 90-ft tall light poles?

**Response:**

We have been informed by SF Planning that there is an exemption to this rule in the planning code.

### **Questions Directed to St. Ignatius**

**9. Question /Concern:**

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?

**Response:**

At the meeting, SI explained that the lights are needed due to expansion of our sports program over the past several years and the lack of and competition for available practice field space in San Francisco. Post meeting, SI informed the neighbors that SF Public Schools and other entities use Kezar Stadium for their lighted games.

**10. Question /Concern:**

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.

**Response:**

See answers to questions 2 & 3 above. At the meeting SI informed the neighbors that the CUP process was started prior to the Covid19 pandemic and that we were following guidelines provided by SF Planning Department. The neighbors requested further clarity from the planning department and were given this response on May 4, 2020:

The remote pre-application meeting is a new process alternative created in response to the current health crisis and the City's Shelter-in-Place Order which initially began on March 17, 2020. Prior to the health crisis, the Sponsor had noticed and was preparing to present an in-person Pre-Application meeting per (what had been) the established protocols.

The remote pre-application meeting is a new process alternative created in response to the current health crisis and the City's Shelter-in-Place Order which initially began on March 17, 2020. Prior to the health crisis, the Sponsor had noticed and was preparing to present an in-person Pre-Application meeting per (what had been) the established protocols.

**11. Question /Concern:**

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?

**Response:**

At the meeting we answered as follows: we are requesting to have the lights on until 10 p.m. on weeknights and 8 p.m. on weekends as we are unsure of future needs. At this time, in the short term, we foresee the lights being used primarily for low attendance practices. Since the meeting we have communicated greater detail about the amount and nature of field use. Specifically, that use will be almost entirely for low attendance practices and small games with no use of the sound system and approximately 3% of the use will be for games with large attendance and use of the sound system.

**12. Question /Concern:**

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

**Response:**

We will have to work together with neighbors on this issue. Please keep in mind that large attendance / noisy events will not occur very often (see answer to question 11).

**13. Question /Concern:**

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?

**Response:**

We do not envision having more than 4 or 5 large attendance night games (see question 11). The school has started its Good Neighbor section of its website and has hired a security director and uses security guards since the last games were held. Discussions with neighbors have increased in the period after the last lighted games. Lastly, the past games were one off, very special events with heightened attendance. We do not foresee this being the case in the long term with the new lights.

**14. Question /Concern:**

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.

**Response:**

SI did not answer this question as we believe it is not pertinent to the project.

**15. Question /Concern:**

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)

**Response:**

We do not recall such a promise. The sound system is state of the art which we believe will be far better for all involved. Sound will only be used for large attendance games and not for practices. The number of noise events will remain the same with the lights, however, the time will be shifted from Saturdays to Friday afternoons and evenings.

**16. Question /Concern:**

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)

**Response:**

SI engaged a traffic engineer, however, after review with the SF Planning Department, it was determined that field usage would shift high traffic events from Saturdays to Friday evenings. Saturday events coincided with West Sunset soccer events while Friday events alleviate this issue. Lighted field use is primarily for practices with attendance typically well under 200 people.

**17. Question /Concern:**

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

**Response:**

The San Francisco Planning Department makes the determination as to whether an Environmental Impact Report is required. The neighbors have since approached SF Planning and they have responded to this question.

**18. Question /Concern:**

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.

**Response:**

SI sent the plans to SINA as requested.

**19. Question /Concern:**

How many students are issued parking permits? How is it enforced? Is there a cost to the students?

**Response:**

SI did not answer this question as we believe it is not pertinent to the project. Parking during evening hours for student attended practices is far less than during daylight hours when school is in session. Based on Zoom chats made during the presentation, we believe this question is related to the neighborhood requesting parking stickers for restricted parking.

**20. Question /Concern:**

Questions for 4/29 Neighborhood Meeting concerning SI Field Light Proposal.

1. Can a proper lighting study with photometric calculations showing field light levels be prepared and given to the community?
2. Can a context site section drawing be prepared showing scale of 90' stadium lights with reference to surrounding residential buildings be shared with the community?
3. Can a daytime view of stadium lights prepared and shared with the community? If all of these have already been done please present at tonight's meeting. Thank you, Jay Manzo/neighbor

**Response:**

These items were sent to the SINA for distribution to the neighbors.

**21. Question /Concern:**

Regarding the planned football field lights,

- what is the planned scheduled frequency of usage vs the existing usage of the field currently (Days, hours, organizations using it)?
- Has there been any traffic, wildlife, parking, noise, and lighting pollution (environmental) studies completed (Even if CEQA exempt, would help alleviate neighborhood concerns)?
- Will there be any physical lighting mockup to demonstrate impacts (or no impacts) to the neighborhood?
- What would be an example of similar specified lighting design that we can go

**Response:**

SI is requesting usage until 10 pm so as not restrict future unplanned and/ or changed use of the field due to schedule and league changes. The traffic, parking, and light pollution question was answered previously. There is no plan to do a mock up as the light study was done by the same firm that did the study for Beach Chalet Soccer Fields. Similar lights are in use at Margaret Hayward Park Playground in San Francisco and at Hillsdale High School in San Mateo.

**APPENDIX 5**

**JANUARY 2016 SUNSET BEACON ARTICLE**

# Night-time Lighting for S.I. Field Draws Fire from Neighbors

By Thomas K. Pendergast

Neighbors living around Saint Ignatius College Preparatory School are taking a dim view of the high school's plan to install permanent stadium lighting around J.B. Murphy Field so it can host football games on Friday nights, and other events during the week.

In the recent past, the school has rented lights periodically for *night games* but most of the school's games are played on Saturdays. Now, the administration is considering regularly moving some athletic contests to Friday nights.

"During the winter months the sun sets pretty early and we just would like extended time for our kids to play," said Paul Totah, the school's director of communications. "Right now our theater program and our performing arts program can perform well into the evening. Our parents can come for evening meetings here at school. Our ministry program can do things well into the evening but it's our athletic program that's limited by daylight hours."

The school's desire to illuminate the gridiron, however, has sparked resistance among some locals looking to pull the plug on the proposal.

"The largest concern for most everyone is indeed the proposed stadium lights and the fact that that will bring night games and night activities to the school," said Deborah Fischer-Brown,

Continued on page 8

# Night-time Lighting a Concern at St. Ignatius

Continued from page 1

who lives directly across the street from the field, which is located at 39th Avenue and Quintara Street. "I think everyone in the neighborhood recognizes that when we bought our houses the school was there and so we knew what we were getting into in having games and activities during the day, but none of us signed up for night-time.

"The bands will be playing. There will be screeching cars. There will be drinking. They say they can control that but it's a high school and I'm sure there will be some rowdiness," Fischer-Brown said.

Totah said the school is aware that the neighbors are worried about the installation of permanent lights for night games.

"We're working with them to make this as low-impact as possible," Totah said. "We've already instituted some changes. We met with our neighbors for the first time in May and then we met with them again back in September. ... We have four (public address) speakers; we've turned off two of them. We've done sound studies to indicate the decibel readings when the loudspeakers are on and we have adjusted the time of practice start-times in the morning. We're going to put a firm limit on the end-times of games and practices for evening games and evening practices."

According to Totah, the school is planning on "five or six" night-time football games during the football season on Friday nights, which would end at 10 p.m. It is also planning on other games for different sports, like lacrosse, which would end at 8 or 9 p.m.

The neighbors, meanwhile, have had a couple of meetings on their own about the



Photo: Paul Kozakiewicz

**The St. Ignatius School football field and track could be getting permanent night-time lighting for sporting events.**

issue and are circulating a petition against the proposal. The petition is being circulated by Jack Allen, who is a neighbor of the school. He estimates that he has spoken to about 100 neighbors regarding the issue and also hosted a meeting last summer.

"I have 60 signatures. We could get a lot more. ... We could get another 40 or 50, I'm sure," Allen said.

Allen said the petition lists the problems that the neighbors expect will come from installing new lights for sports activities, including excess noise, congestion and vehicles blocking driveways.

"A lot of people are very angry. I'm not angry," he said.

The petition says: "There have been many instances where vehicles during day games have blocked half our driveways, barring us from entering and exiting our garages. Nighttime is an important time for many of us to unwind after a full day of work, prepare children for the next day's activities and enjoy the peace and

quiet of our neighborhood.

"This is a residential neighborhood with very little noise after 6 p.m. This proposal would drastically change that. We urge the school to be a good neighbor and remember that we are already dealing with the inconveniences of the day games. We, the undersigned, are concerned residents, neighbors who urge St. Ignatius College Preparatory to cease their plans to put lights on the football field."

Both sides seem to agree that the lights themselves are not really going to be a big problem because they will be LED lights using the latest technology, designed to prevent light from spilling over into the surrounding area.

"There's almost no spillover," Totah said. "It's phenomenal how focused these lights are. We are very pleased that we were able to get brand new technology for these lights that will just make the impact on our neighbors nothing."

Totah said they are expecting the lights to be installed during the summer, although it is too early to say exactly when.

"A lot of that is contingent upon the SF Planning Department and the SF Planning Commission, so we're in process with them," Totah said.

The school has not yet filed a request for a permit.

"We went to the Planning Department and they told us they wanted two things before we proceed," he said. "They wanted a light study similar to what was done at the Beach Chalet and they also wanted a schedule of when the lights would be used; when the lights would be on, so we're working on those two things right now."

A related issue is the fear that having permanent lights will attract other schools and organizations to rent out the field for night games, increasing the amount of parking problems and noise concerns.

"In the past we have rented it out. In the future we're going to be renting it out a lot less and it has to do with the fact that we met with our neighbors. We've heard their complaints, and we really are attentive to them," Totah said.

"Even though there is money generated, it's frankly not worth it to us if we inconvenience our neighbors that much. We'd rather be good neighbors than otherwise."

But Fischer-Brown is worried.

"They have a backlog of other facilities and other schools that rent out their field as it is now," she said. "You can imagine we would probably have night activities five to six nights a week. ... They're going to have night activities as often as they can. They have no reason to promise us otherwise. Once they get the lights in, all bets are off."

"We think that the current administration is probably speaking honestly and will do their best, but every two years it seems like they change administrations over there. And that's when things start changing.

"We've been in our house for 30-odd years and promises have been made and things have been proposed and then the principal changes and then all his staff changes, and then everything changes," Fischer-Brown said.

Totah said moving games to Friday nights will help alleviate parking problems on Saturdays.

"It's not a good argument for them," Allen responded. "The parking is going to be a problem during the day because of the (nearby) West Sunset Playground."