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# COMMITTEE/BOARD OF SUPERVISORS

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**Prepared by:** Lisa Lew **Date:** October 2, 2020
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August 24, 2020

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RE: Planning Case Number 2018-012648CUA - Saint Ignatius Stadium Lighting Project

Honorable Members of the Board of Supervisors:

I am writing on behalf of the Saint Ignatius Neighborhood Association (SINA) concerning the proposal to install stadium lighting and a telecommunications tower at the Saint Ignatius athletic field ("Project") as a Conditional Use (Planning Case No. 2018012648CUA). SINA is an association comprised of over 165 neighbors who live in the area surrounding Saint Ignatius College Preparatory, located at 2001 37th Avenue in the Sunset District.

Pursuant to San Francisco Administrative Code Section 31.16(e), SINA hereby appeals the San Francisco Planning Department's June 3, 2020 issuance of a categorical exemption from the California Environmental Quality Act ("CEQA") for the Project (Exhibit A) and the San Francisco Planning Commission's approval of the Project on July 23, 2020 (Exhibit B).

The Project proposes to add four 90-foot tall light towers to the J.B. Murphy Field Stadium (field) at St. Ignatius College Preparatory (SI), a private secondary school located in a residential neighborhood in the Sunset District of San Francisco. The light towers are intended to allow for up to 150 nights a year of weekday and weekend evening use of the field for practice, games and events lasting until 9:00 p.m. and on 20 evenings per year until 10:00 p.m. In addition,

on the proposed northwest light tower, the Project seeks to install and operate a Verizon Wireless telecommunication service facility, consisting of nine antennas, six remote radio units and ancillary equipment located within a fenced adjacent compound.

The light and wireless towers would be by far the tallest structures in the area of the affected Sunset District neighborhood, exceeding the 40 foot height limit for this area by more than a factor of two. At this time there is no lighting at the field, which means the Project proposes a significant expansion of use of the field in the evening hours from 5-6 p.m. in the fall and winter seasons to 9-10 p.m. under the proposed Project. This change in use accompanying the Project will have new and potentially significant impacts on residents surrounding the stadium due to evening light pollution and glare, as well as noise, traffic and parking impacts caused by the change in the timing of events into the evening and nighttime hours and the aesthetic impacts of four 90 foot towers suddenly appearing in the neighborhood.

Despite the potentially significant impacts of this major change in the field facility, including a shift from daytime to nighttime sports activities, the Planning Department chose to exempt this Project from CEQA review. As presented in SINA's prior comments, a CEQA exemption for this major project is contrary to CEQA law, case decisions and standard practice in which the conversion of stadiums to lighted athletic fields typically requires the preparation of an environmental impact report (EIR). SINA appeals the Planning Department's and Planning Commission's actions as contrary to CEQA as well as good public policy, which requires the potentially significant impacts of this new lighting and change in use to be evaluated in a CEQA process rather than summarily dismissed as insignificant by planning staff.

## BASIS FOR APPEAL - VIOLATION OF CEQA

In this appeal, SINA challenges the Planning Department's determination that the Project is exempt from CEQA review as a Class 1 Existing Facility, or a Class 3, New Construction. SINA appeals this determination, which is contrary to CEQA. First, the Project itself does not fit within either of these proposed exemptions. Second, even if an applicable CEQA exemption *did* apply, the Project in this case clearly has the potential for significant impacts due to its unusual size and new change of use being introduced into the evening hours of the neighborhood, in which case the CEQA exceptions to exemptions would apply, thereby requiring CEQA review. *See* 14 Cal. Code Regs. (CEQA Guidelines) § 15300.2.

The Project before the Board is a large construction that will introduce lighted evening sports activities into a low light residential neighborhood for up to 150 nights during the fall and winter evenings until 9 or 10 p.m. This is a drastic change with foreseeable significant impacts to residents due to light and glare pollution and the aesthetic impacts of the large towers, as well as increased evening noise, traffic and parking, particularly for the 20 events a year lasting until 10 pm envisioned by the Project. As is true for other lighted sports stadium projects being considered in California, CEQA review is required for light stadium projects such as this one. *See Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist.* (2013) 215 Cal. App. 4th 1013 (requiring

EIR for stadium light project.); Supplement to SINA Advance Submission filed on June 9, 2020 (Supplemental Submission) pp. 2-4 (listing lighted stadium projects requiring EIR). Such review is necessary to assess adequately the significance of these adverse impacts, *see* Pub. Res. Code § 21065 ("project" means an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment"); *id.,* § 21068 (significant effect on the environment means a substantial, or potentially substantial, adverse change in the environment"); and whether there is mitigation or project alternatives that can avoid or substantially lessen their worst effects. *See* Pub. Res. Code § 21002.

Instead in this instance, the exemption process has made a mockery of the required CEQA review. The proposed exempt Project contains no traffic or parking analysis that addresses the substantial changes that may occur from shifting over 150 games and practices a year into the late evening hours. *See Taxpayers for Accountable School Bond Spending, supra,* 215 Cal. App. 4th 1013 (EIR required to study traffic and parking issues for lighted stadium project.) There is no noise study but instead simply a conclusory assertion that the Project "would not result in substantial permanent increase in ambient noise levels in the project vicinity or expose persons in excess of noise level standards," notwithstanding that noise levels at events would logically be expected to increase due to higher expected attendance, as well as creating high noise levels in the more sensitive evening hours as compared to noise occurring earlier in the day.

Finally, rather than completing a photometric study with narrative explanation for why light spillage, glare and constant blue light glow every winter and fall evening does not have the potential for significant aesthetic impacts to adjacent residents, the Planning Department's report simply references the opinion of staff that lighted field projects do not have the potential for adverse impacts on the surrounding local community. The Department apparently backs up this subjective finding with printout sheets of a light modeling run by SI's consultant Musco, without any narrative explanation of how tests were run, and which itself reveals levels of light trespass and glare that greatly exceed generally accepted community standards for residential neighborhoods. *See* St. Ignatius Sports Lighting Proposal Response, Kera Lagios, LEED AP, dated July 7, 2020 (Lighting Proposal Response), submitted with SINA's 2nd Supplement to Advance Submissions dated July 22, 2020 (Second Supplement).

This approach does not comply with CEQA. CEQA review allows the public to meaningfully consider information presented in a CEQA review document that has analyzed the potential adverse environmental impacts of a project. *See e.g., Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 392 (CEQA process "protects not only the environment but also informed self-government.") Here, the public has not been given that opportunity. The Board should grant SINA's appeal on this matter and remand to the Planning Department to conduct an initial study, the required first step in the CEQA review process.

**A. The Project is Not Subject to the Planning Department's Claimed Exemptions.**

Under CEQA, categorical exemptions are reserved for classes of projects that have been

determined not to have significant impacts on the environment. *See* CEQA Guidelines § 15300. For that reason, categorical exemptions under CEQA should be narrowly construed to ensure that they are not applied in a manner that exempts a project that was not envisioned under any of the CEQA exempt classes.

A lighted stadium project such as this one in a residential community is not a project that as a 'class' can be determined not to have potentially significant impacts on the surrounding neighborhood. In contrast, due to the predictable light pollution and issues arising out of increased nighttime use involving games and events, such projects are normally subjected to full CEQA review. *See* Supplemental Submission, pp. 2-4. The Project in this case is no different than any other lighted stadium facility and cannot be exempted from CEQA review.

**1. The Project Does not Fall Within the Class I Exemption for Existing Facilities.**

The Class One exemption under CEQA Guidelines § 15301 is not applicable to a stadium lights project that will create an entirely new source of light pollution and glare, meanwhile expanding stadium use into the nighttime hours to 9 or 10 pm on over 150 nights per year with accompanying noise, traffic, parking and other adverse effects on the local neighborhood.

The Class One exemption "consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use." CEQA Guidelines § 15301. The exemption envisions different types of existing facilities, but notes that "[t]he key consideration is *whether the project involves negligible or no expansion of use*." *Id.* (emphasis added.)

None of the exempt projects listed under this exemption remotely resemble the proposed Project, a new lighted stadium facility in which new nighttime lighting and evening athletic games and events will now be allowed to occur. *See id.§§* 15301(a)-(o).

The Department defends its Class 1 exemption determination by characterizing the Project as "[i]nterior and exterior alterations" or "additions under 10,000 sq. ft." But the construction of four light towers of 90 feet and a wireless cell phone tower facility is not a 'minor alteration' of an existing structure; instead the new facility will exceed local height standards for this zoning district by over two fold. Further, the towers are 1) not an 'existing structure'; and 2) not a 'building' for which this exemption standard might be applicable. The conversion of the existing stadium into a lighted facility is not a 'minor' structural alteration, it is a new development with new light impacts on the surrounding neighborhood.

More fundamentally, the Project proposes not a 'negligible' but rather a considerable "expansion of use," 150 games and events into the late evening hours, with accompanying lights, noise, traffic and parking impacts. Surprisingly, the Planning Department appears to have ignored this impact in its exemption decision, asserting instead that "[t]he proposed addition of lights at the

existing facility would not expand the use of such facility" because "the proposed lights would shift the existing use to later times in the day and/or days of the week." This assertion completely ignores the Project purpose, which is to expand the level of use by increasing the times available for athletic games and events and allowing more spectators to attend in the later evening hours. Allowing this expanded use to occur in the evening (versus daytime) hours is itself an 'expansion' of use in that use previously limited to daylight hours is now expanded into the evening hours with foreseeable greater impacts on affected residential communities living next door to the proposed Project.

**2. The Project Does not Fall Within the Class III Exemption for New Construction**

The Class Three exemption under CEQA Guidelines § 15303 for new construction is not applicable to a stadium lights project that will create new light pollution and glare, noise, traffic and parking into the nighttime hours to 9 or 10 pm on over 150 nights per year within a residential neighborhood.

The Class Three exemption, also known as the 'infill exemption,' "consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure." CEQA Guidelines § 15303. Examples provided by this section are "[o]ne single-family residence, or a second dwelling unit in a residential zone," a "store, motel, office, restaurant or similar structure....not exceeding 2500 square feet in floor area" or 10,000 square feet in urbanized areas, "[w]ater main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length," "garages, carports, patios, swimming pools, and fences." CEQA Guidelines §§ 15303(a)-(f).

The Department lists its Class Three exemption as applying to "[u]p to three new single-family residences or six dwelling units in one building; commercial/office structures; utility extensions; change of use under 10,000 sq. ft." The Department provides no other explanation for how a new lighted sports facility extending games and events to 9-10 p.m. into a residential neighborhood falls within any of these categories.

Here, the 90 foot light towers erected to allow for nighttime sports activities in a residential neighborhood is a completely different project than the 'small structures' described in the exemption such as a garage, patio or a residence. The Department's reference to the exemption's 10,000 square footage limits demonstrates this incongruity, as the issue with 90 foot, lighted towers has nothing to do with the square footage of a building on the ground, but rather the excessive height of the structures as well as the construction of lighting apparatus that will permanently allow games and events to be played into the late evening. Nor can the new towers and lights be considered simply a 'utility extension' that would be accessory to standard infill development such as a "store, motel, office, restaurant or similar structure." Instead, they comprise a new lighted stadium facility with potentially significant impacts on the neighborhood that would not be at issue for projects properly falling within this exemption.

## B. A CEQA Exemption Cannot Apply Because There Is a Reasonable Possibility That the Project Will Have a Significant Effect on the Surrounding Community Environment Due to Unusual Circumstances.

Even if a CEQA exemption were to apply to the Project, CEQA requires an 'exception' to the exemption for an "activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances." CEQA Guidelines 15000.3(c). Here the lighted stadium Project has a reasonable possibility of having significant impacts to the surrounding neighborhood due to the usual circumstances of this Project, which, unlike all the other types of projects discussed in the CEQA Class 1 & 3 exemptions claimed for the Project by the Planning Department, proposes tall towers greatly exceeding the local height limit, which will allow the stadium to function as a nighttime lighted sports facility causing environmental impacts that would never occur from the projects described in the exemptions.

### 1. There Is a Reasonable Possibility That the Project Will Have a Significant Effect on the Surrounding Neighborhood.

There is a reasonable possibility that the lighted stadium Project being proposed will have significant impacts on the surrounding neighborhood and environment due primarily to the effects of constant light and glare on most winter and fall evenings punctuated by numerous games and events that will be attended by hundreds if not thousands of spectators.

Whether there is a reasonable possibility of significant impacts is reviewed under the fair argument standard, *see Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1114, which requires CEQA review if the "lead agency is presented with a fair argument that a project may have a significant effect on the environment, ...even though it may be presented with other substantial evidence that the project will not have a significant effect." *Id*. at 1111. Here there is adequate evidence to support a fair argument that the Project could have potentially significant impacts on the surrounding neighborhood.

#### a. The Light Impacts of the Project are Potentially Significant.

The Project proposes 90 foot light towers which will operate up to 150 nights a year. A review by SINA's lighting expert identified that according to SI's lighting consultant Musco, illumination from the Project shows:

- illumination levels of 0.33 footcandles (fc) horizontal, and 0.42 fc vertical at the facades of the houses directly across 39th Avenue, which are 3-4 times higher than recommended for those residential areas according to the standards of the IES (Illuminating Engineering Society) for residential neighborhoods.

- illumination levels of 6 fc horizontally and almost 7 fc vertically at the property line, which greatly exceeds the IES standards of 0.3 fc recommended levels at the property line of the light

source, as well as the recommended levels of 0.5 fc set by the International Commission on Illumination ("CIE").

● illumination off the ground of 2.6 fc measured offsite in the middle of the street , which is 25 times greater than the 0.10 fc limits identified in Leadership in Energy and Environmental Design (LEED) green building standards used worldwide.

● glare impacts measured at between 1,000 to 50,000 candelas (cd) at the edge of residences on 39th Avenue, with constant glare of between 1,000 to 5,000 candelas extending well past residential property lines, into the backyard of some residences, approximately 10 times the 500 candela level identified by Musco as insignificant.

*See* Lighting Proposal Response, pp. 1-2, 6.

These figures all represent potentially significant light pollution impacts that have not been addressed by SI, nor the Planning Department's cursory dismissal of the issue based on its "experience of conducting environmental review on similar projects near residential areas." Here, the offsite illumination levels predicted by Musco are high, well above the various IES and CIE levels advised for residential areas. *See* Lighting Proposal Response*,* p. 2 ("[T]his is an excessive amount of light spilling off of the property.")

Similarly for glare, the impacts identified in Musco's own chart shows constant candela levels of well above the 500 cd level found to cause human disturbance. Musco assumes that 25,000 candelas represents a 'significant' amount of glare, comparable to staring into the headlights of a car with its brights on. This threshold is excessive, as both the IES and CIE traditional candela standards for glare are well below this figure for low-light residential areas. The most recent 2017 CIE standards dispense with simple candela measurements based on illumination and instead adopt a more specific calculation based on the ambient brightness zone, the aiming and size of the light source relative to a specific receiver, and the distance of the receiver from the light source. *See* CIE 150: 2017 Table 3. Under these criteria, constant glare ranging from 1,000 to 5,000 cd would constitute a significant impact, particularly for neighbors having to deal with such constant light pollution up to 150 nights per year.[1]

Besides Musco's own abbreviated information actually showing a possibility of significant light impacts, other impacts are identified by SINA's light expert as potentially significant, even in the

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[1] These levels of exposure shown by the Musco report contrast directly with SI's initial assertions in its application, which falsely stated: "The results of the spill/glare light studies indicate that spill/glare light impact should be zero toward the west side of 39th Avenue, Rivera Street and 37th Avenue. 39th Avenue and Rivera Street residents should not see any glare from fixtures at all; only the illuminated surface of the football field will be visible." The Musco report, while itself incomplete and lacking adequate information, nonetheless demonstrates that light and glare impacts to surrounding residents will certainly not be 'zero.'

absence of adequate information provided by SI or the Planning Department. For example, light trespass is measured generally at ground level, thereby missing entirely light and glare affecting higher elevations, particularly the second stories, which are the primary living spaces of residences on 39th Ave. *See* Lighting Proposal Response*,* p. 1 ("Musco's photometrics show the vertical illuminance of 0.42 fc (~4.2 lux) at the facades of the residences, however, this measurement is taken 3'-0" above the ground...this does not at all represent the amount of light entering the windows which are mostly on the 2nd level of the homes. Given the mounting heights of the lights (15',16', 22', and 65', 87', 90'), much more light will be present at eye level above grade and entering the residential windows, approx. 12'-20.'")

This concern is particularly acute with respect to glare. Glare is not a simple function of distance, and depends critically on geometry and observer elevation relative to the proposed light sources. *See* SINA's May 6, 2020 Advance Submission (Advance Submission), Appendix 1, Photographic Renditions and Scale Drawings Showing Relationship of 90-foot Pole Height to Surrounding Buildings and Landscape*,* Cross Sectional drawings on pp. 5-6 of Appendix. This means that predictions of glare effects at the property line at a given receiver elevation are not necessarily representative of glare effects as viewed off-site at receivers having a higher elevation (i.e., above the horizontal plane of playing field.)

Further, significant glare and 'brightness' effects are identified by SINA's expert but not addressed by the Project documents. These include the fact that the lights proposed for the facility are considered "cool" and thus produce more glare than a similar fixture with a lower color temperature, making the glare appear even brighter, an effect known to be more severe for people over 65. *See* Lighting Proposal Response*,* pp. 3-4. SINA's expert further identifies this type of blue stadium light as particularly disruptive to the circadian system and concludes that '[b]ecause the circadian system responds to the quantity of light received at eye level, the higher vertical illuminances created by the Musco lights are going to elevate the impact." *Id*. p. 6. "Most importantly, the lights will be on....virtually every weeknight during the school year, for up to 4 or 5 hours at a time in winter. This significant increase in the quantity and duration of blue-enriched light during dark hours has the potential to have significant impacts on circadian health, *especially in children who are much more vulnerable to such disruptions*." *Id.* The prevalence of typical Sunset District fog will further exacerbate these glare and light pollution effects, by greatly increasing the reflective power of the lighted facility. *Id.,* p. 7.

The Musco model runs and Planning Department responses provide no assurance that these light impacts of the Project will not be significant. They do not address the degree to which the expected constant glare and light pollution – occurring nearly every evening for five months in the fall and winter – does not have the potential to be adverse and significant. There is no narrative explanation for why light and glare impacts will be insignificant, except Musco's inappropriate references to a glare threshold corresponding to looking straight into a car's high light beams. Further, most problematically, "Musco has not provided the IES photometric data files ..or any report on the photometric distribution of the luminaires" making it impossible for the public to "evaluate the BUG (backlight-uplight-glare) ratings of the selected luminaires to evaluate their characteristics," or the

how the angled tower lighting will be shielded to avoid light impacts not necessarily detected by Musco's model runs conducted without any of the background information necessary to confirm the accuracy of the model's predictions. *Id.*, p. 7. Without this information, there is no way for the public even to assess the veracity of SI's dubious assertions that light impacts will be negligible. Such information would be routinely presented and analyzed in a normal CEQA process but has been withheld here based on the Planning Department's unsupported assertion that the Project is exempt from CEQA review.

**b. There is a Reasonable Possibility that Noise, Parking, Traffic and Public Safety Impacts Caused by Expanding Use to Games, Events and Practices Until 9 or 10:00 p.m. 150 Nights a Year May be Significant.**

In addition to practices, the Project proposes to host potentially over 100 games and events running until 9:00 or 10:00 p.m., with attendant noise, traffic and parking impacts, which will extend beyond those times as visitors in attendance depart after the stadium lights are shut off. These games and events will create a host of adverse effects to surrounding residents that have not been addressed *in any way* through the Planning Department's exemption of the Project from CEQA review.

As discussed in SINA's Advance Submission, the impacts of some of SI's prior events using borrowed lights have caused significant noise, traffic, parking and public safety impacts:

> In previous years, SI has rented field lighting for select night time football games. During those games we experienced extreme noise levels, with cheering, band music, game announcers and recorded music blaring over loudspeakers. The games typically lasted until well after 9PM. The associated noise prevented us from having normal dinner conversations, hearing our televisions, or getting our children to sleep. Even neighbors several blocks away complained about the noise. There were also pre and post-game celebrations with drinking, public urination, cars honking and loud cheering. These games attracted not only SI students/fans, but also the opposing team's students/fans. Not only did we experience high traffic volumes, but also found our driveways blocked and no available street parking. We and any friends visiting us had to park many blocks away. After the games everyone went home, and the neighbors were left with litter and broken bottles, and overly tired children.

*See* Advance Submission, p. 4.

Here, however, the Planning Department has inexplicably not required SI to prepare either a noise study, a traffic and parking study, or a public safety analysis. Instead, the Project assumption appears to be that 1) noise, traffic and parking impacts will not change with the later event and game times from the current daytime schedule; and 2) low noise levels will be maintained by a new PA system, information on which is not provided as part of the Department's review; and 3) parking, traffic and public safety will be addressed on an ad hoc basis as the Project commences operation. This approach is wholly inadequate under CEQA. Here, neighborhood testimony contained in its three submissions to the City contain evidence that evening events attract more visitors, cause higher

noise levels due to "cheering, band music, game announcers and recorded music blaring over loudspeakers," and lead to myriad traffic and parking effects that prevent residents from even accessing their own homes. This is completely consistent with the experience of other jurisdictions, such as in Marin County, where the County determined that stadium lighting at Marin Catholic would lead to noise increases that would likely be significant:

> The proposed project, installation of a field lighting system on an existing school athletic field, would essentially serve to extend the hours of activity on the field. The noise impact report, prepared by your consultant, [shows] there would be as much as an 11 decibel difference (with a maximum of 71 decibels) between the existing ambient noise levels and the noise levels that would be generated during a Friday night game, as measured from neighboring properties. Other types of sports games and practices are anticipated to increase decibel levels by as much as 10 decibels, as compared to the existing ambient noise levels during evening hours in the surrounding neighborhood. *Our opinion is that the nighttime use of the field should be treated as a new use rather than an existing use because the field is not usable during the evening hours without a lighting system.....*In reviewing the proposed project with respect to the anticipated noise impacts that would result from activating a presently dormant athletic field during the evening hours, it is apparent that there will be a notable change to the noise levels in the surrounding neighborhoods, where the existing ambient noise levels are relatively low during the evening hours.

*See* Advance Submission, Attachment 1, Marin County Planning Division 2016 Letter Re: Marin Catholic High School Lighting Proposal, p. 2 (emphasis added),

Rather than assessing potential noise impacts from late night games and events – occurring at more sensitive times when residents are preparing for and going to sleep - the Planning Department has simply abdicated its regulatory responsibility, deciding instead, without support, that the "proposed project would not result in substantial permanent increase in ambient noise levels in the project vicinity or expose persons in excess of noise level standards" because the 'new sound system would be designed to direct sound away from the neighbors during games" and thus "it is anticipated that noise levels could decrease." This reasoning is laughingly flawed.

The Department willingly ignores the increased sensitivity of residents to late evening – as opposed to daytime – noise. Further, no analysis is presented regarding the increased attendance at games and events that will be made possible by hosting these activities after the work day when more spectators can attend. The Department's theory that an improved sound system will 'decrease' noises levels further ignores that 1) the noise from games and events is caused not just by the sound system but also by "cheering, band music and recorded music blaring over loudspeakers," including "pre and post-game celebrations" involving "drinking, public urination, cars honking and loud cheering;" and 2) no information on the so-called 'improved' sound system has been presented or is even part of the Project. In other words, there is no guarantee that a new system will provide reduced noise levels or, in the absence of enforceable mitigation being adopted as part of a CEQA review process, that SI will even bother to create a new sound system in the first place. In sum, the

Department's unanalyzed and logically flawed reasoning that noise impacts need not be addressed does not come near meeting CEQA's requirements. *See e.g.,* CEQA Guidelines, Appendix G, Section XII (significant noise impacts where project will result in "a substantial temporary or periodic increase in the ambient noise levels in the project vicinity above levels existing without the project.")

Similarly, Marin County found that traffic for evening games at Marin Catholic would be greatly increased from daytime levels:

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

*Id.,* p. 3 (emphasis added). In stark contrast, SI's Project application states that "SI has not been required to do a traffic or parking impact study by the SF Planning Department as it was determined that changes to traffic and parking would have no effect on current patterns and would improve weekend parking and traffic patterns." However, there is no basis for this conclusion without an assessment of baseline traffic and parking conditions. By way of comparison, the Court of Appeal in *Taxpayers for Accountable School Bond Spending, supra,* described the requisite traffic analysis for a stadium light project as follows:

> The Initial Study, including the traffic impact study, did not include any calculation or other description of existing attendance at Hoover football games. To the extent District asserts that calculation was not required by CEQA because Hoover's football games currently are held in the afternoon, the record appears to reflect a virtual consensus among Hoover staff, parents, and alumni, neighborhood residents, and others that *the addition of stadium lighting would allow more persons (e.g., parents) to attend football games during evening hours when most persons are not working and thus increase attendance at Hoover football games*. Accordingly, District should have considered such afternoon game attendance in calculating a baseline attendance figure so it could compare that baseline to expected attendance at evening football games on completion of the Project."

215 Cal. App. 4th at 1048 (emphasis added.)

Ironically, SI's own application appears to acknowledge the potential for significant traffic and parking impacts that have not yet been resolved:

> We have met with representatives of the SFMTA and asked for their input on how to alleviate

> parking and traffic flow while improving safety. SFMTA recommended adding diagonal parking to Rivera Street from 37th to 39th Avenue.... SI has also been in discussion with SFPR and has asked for neighborhood support concerning daytime use of the West Sunset Playground parking lot which would add 40 to 50 parking spaces during school hours...The school will rent A.P. Giannini Middle School parking *whenever possible* for major field events...(emphasis added.)

These traffic and parking impacts must be addressed in CEQA through a traffic and parking study, which is routine for any stadium lighting project surrounded by residential neighborhoods. *See Taxpayers for Accountable School Bond Spending, supra*,, 215 Cal. App. 4th at 1050 ("Taxpayers asserts that District did not conduct an adequate study of the Project's impact on parking. The Initial Study stated the Project will create a parking shortage of 174 spaces. However, based on our review of LOS's study, it appears LOS did not make any attempt to ascertain the total number of offsite, street parking spaces in the immediate area, nor did LOS make any attempt to ascertain the number of available offsite, street parking spaces during the Friday evening time period of 5:30 p.m. to 6:30 p.m. that it selected for determining traffic levels. *Therefore, LOS had no basis on which to conclude the parking shortage of 174 spaces would be filled by available offsite, street parking spaces in the immediate area."*) (emphasis added.)

**c. The Aesthetic Impacts of the Large 90 Foot Light Towers Are Significant.**

Besides the impacts of the Project due to lighting and nighttime activities leading to noise, traffic, parking and public safety impacts, the Project construction itself will cause significant aesthetic impacts through the construction of four 90 foot towers in the middle of a residential neighborhood where existing buildings are subject to a height limit of 40 feet. *See e.g.* Advance Submission, Appendix 1, pp. 1-6; SINA's First Supplement to Advance Submissions dated June 9, 2020 (First Supplement), pp. 7-8 (photo renditions of towers in existing environmental setting.); *id.,* p. 11 (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."); *id.*, p. 12 (architect drawing of light tower size compared to existing neighborhood.)

The Department's failure to consider these impacts as a significant component of aesthetic effects represents a failure to proceed according to law under CEQA.

**2. The Project's Potentially Significant Effects are Due to Unusual Circumstances.**

The potentially significant effects of this Project on the neighboring community are due to the unusual circumstances of this Project, which, unlike the small structures or alterations envisioned in the CEQA Guidelines, instead propose tall towers greatly exceeding the local height limit that will allow the stadium to function as a nighttime lighted sports facility causing new environmental

impacts that would not typically be caused by any of the projects described in the CEQA Guidelines.

To determine whether unusual circumstances exist, the Board should consider whether "the circumstances of a particular project (i) differ from the general circumstances of the projects covered by a particular categorical exemption, and (ii) those circumstances create an environmental risk that does not exist for the general class of exempt projects." *San Francisco Beautiful v. City and County of San Francisco* (2014) 226 Cal.App.4th 1012, 1024. *See also Santa Monica Chamber of Commerce v. City of Santa Monica* (2002) 101 Cal.App.4th 786, 800 ("[W]hether a circumstance is 'unusual' is judged relative to the typical circumstances related to an *otherwise typically exempt project*.") (emphasis added.)

The Project differs considerably from the small structural alteration of an existing facility with negligible expansion of use (Class I) or a small-scale construction of infill development (Class 3). This can be seen from its height, which greatly exceeds by more than a factor of two the zoning standards applying in the neighborhood where the Project would be built. The extreme height and light to be emitted from the light structures raise a host of aesthetic impacts that would not occur for typical projects in the Class I and Class 3 exemption. *See Voices for Rural Living v. El Dorado Irrigation Dist.* (2012) 209 Cal. App. 4th 1096, 1109 ("The sheer amount of water to be conveyed under the MOU obviously is a fact that distinguishes the project from the type of projects contemplated by the class 3 categorical exemption.")

The Project also differs significantly from the Class I and Class 3 exemptions in that it greatly expands use of the stadium into the nighttime hours, with events attracting potentially over 1,000 spectators lasting until 9 to 10 p.m.

The Class I exemption is limited to projects creating at most a "negligible" expansion of use. For residents now having to deal with new light pollution, and the attendant impacts of large, late evening gatherings due to traffic and lack of parking, such a use expansion is far from negligible. *See e.g.,* Advance Submission, p. 4 ("The games typically lasted until well after 9PM. The associated noise prevented us from having normal dinner conversations, hearing our televisions, or getting our children to sleep....There were also pre and post-game celebrations with drinking, public urination, cars honking and loud cheering. ...Not only did we experience high traffic volumes, but also found our driveways blocked and no available street parking. We and any friends visiting us had to park many blocks away. After the games everyone went home, and the neighbors were left with litter and broken bottles, and overly tired children.")

The Class 3 exemption is also not intended for projects that substantially change the use of a facility. Instead, this exemption focuses on the construction of new infill development projects. Neither of these exemptions apply to a non-negligible expansion in use that has the potential to cause significant adverse effects to the surrounding community.

### C. A CEQA Exemption Cannot Apply in this Case Due to the Cumulative Impacts of Foreseeable Future Expansion Projects.

The CEQA Guidelines also require an exception to an exemption "when the cumulative impact of successive projects of the same type in the same place, over time is significant." *See* 14 Cal. Code Regs. § 15300.2(b). Here, three foreseeable projects will increase cumulative ambient lighting around the Project site on the SI campus, which leads to the possibility of significant cumulative light pollution in the surrounding neighborhood. These projects are:

- expansion of the lights schedule at the upper practice field from lights off at 7:30 p.m. to 9:00 p.m. on practice nights and 10:00 p.m. on Friday game nights, matching the Murphy Field light schedule (this expansion was originally proposed as part of the Project).

- Bleacher & Pedestrian Pathway Lighting requiring "code compliant lighting" to "be added for the bleachers and sidewalk surrounding the field."

- construction of a new theatre/performing arts center and large outdoor swimming pool as part of SI's five year Master Plan expansion plans stated in 2015, which will further increase outdoor lighting and light pollution in and around the school site.

Each of these projects will contribute to the significant effects of SI's planned expansion, including the impacts of this Project. However, none of these cumulative effects are considered by the Planning Department's 'analysis' that CEQA review is not required.

### D. The Project has been Unlawfully Segmented.

A public agency may not divide a single project into smaller individual projects in order to avoid its responsibility to consider the environmental impacts of the project as a whole. *Orinda Assn. v. Board of Supervisors* (1986) 182 Cal. App. 3d 1145, 1171. Courts have considered separate activities as one CEQA project and required them to be reviewed together where, for example, the second activity is a reasonably foreseeable consequence of the first activity (*Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263); the second activity is a future expansion of the first activity that will change the scope of the first activity's impacts (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376); or both activities are integral parts of the same project (*No Oil, Inc. v. City of Los Angeles* (1987) 196 Cal. App. 3d 223.)

Here, SI has determined not to include the following approvals as part of its proposed Project:

- expansion of the lights schedule at the upper practice field from lights off at 7:30 p.m. to 9:00 p.m. on practice nights and 10:00 p.m. on Friday game nights, matching the Murphy Field light schedule.

- Bleacher & Pedestrian Pathway Lighting requiring "code compliant lighting" to "be added

for the bleachers and sidewalk surrounding the field."

- addition of a sound system to the newly lighted stadium for PA play by play announcement during evening games and events, which is discussed in the Project but never analyzed or assessed.

Each of these future activities must be considered as part of this Project, which envisions lighted activities at both Murphy Stadium and the upper practice field, corresponding lighting for the area around the stadium and fields, and sound system for the planned events and games. These additional activities will increase impacts relating to light pollution, noise, traffic and parking, which have not been addressed in this proceeding. This failure violates CEQA.

## CONCLUSION

The proposed Project portends a major change in use and environmental effects to the surrounding neighborhood community. The impacts of this change must be assessed in a CEQA review process in order to identify potentially significant impacts and evaluate the feasibility of mitigation measures or alternative approaches that may avoid or substantially lessen those impacts. *See* Pub. Res. Code § 21002.

SINA represents the local community which has made repeated good faith efforts to require CEQA review to ensure that their lives and local environment are not permanently disrupted by SI's plans to expand its athletic facilities and activities. SINA requests that the Board grant SINA's appeal and remand the Project application back to the Planning Department to prepare an initial study as required by CEQA.

Yours Truly,

Michael Graf
On Behalf of Saint Ignatius Neighborhood Association

# EXHIBIT A

# CEQA CATEGORICAL EXEMPTION DETERMINATION
# 2018-012648CUA

# JUNE 3, 2020

SAN FRANCISCO
**PLANNING DEPARTMENT**

# CEQA Categorical Exemption Determination

## PROPERTY INFORMATION/PROJECT DESCRIPTION

| Project Address | | Block/Lot(s) |
|---|---|---|
| 2001 37TH AVE | | 2094006 |
| **Case No.** | | **Permit No.** |
| 2018-012648ENV | | |
| ■ **Addition/ Alteration** | ☐ **Demolition (requires HRE for Category B Building)** | ■ **New Construction** |

**Project description for Planning Department approval.**

Conditional Use Authorization to permit the addition of new stadium lights on an existing football field at St. Ignatius College Preparatory. The project proposes a lighting system at the J.B. Murphy Field athletic stadium to allow for evening use and a Verizon macro wireless telecommunications services (WTS) facility consisting of nine (9) panel antennas that will be screened. The project would construct four 90-foot tall poles with LED light fixtures and the north-west pole would include the WTS facility and ancillary equipment. Installation of each pole would require up to approximately 30 feet of excavation below ground surface, resulting in a total of approximately 60 cubic yards of soil disturbance.

## STEP 1: EXEMPTION CLASS

**The project has been determined to be categorically exempt under the California Environmental Quality Act (CEQA).**

| | |
|---|---|
| ■ | **Class 1 - Existing Facilities.** Interior and exterior alterations; additions under 10,000 sq. ft. |
| ■ | **Class 3 - New Construction.** Up to three new single-family residences or six dwelling units in one building; commercial/office structures; utility extensions; change of use under 10,000 sq. ft. if principally permitted or with a CU. |
| ☐ | **Class 32 - In-Fill Development.** New Construction of seven or more units or additions greater than 10,000 sq. ft. and meets the conditions described below:<br>(a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.<br>(b) The proposed development occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses.<br>(c) The project site has no value as habitat for endangered rare or threatened species.<br>(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.<br>(e) The site can be adequately served by all required utilities and public services.<br>**FOR ENVIRONMENTAL PLANNING USE ONLY** |
| ☐ | **Class ____** |

## STEP 2: CEQA IMPACTS

**TO BE COMPLETED BY PROJECT PLANNER**

| | |
|---|---|
| ☐ | **Air Quality:** Would the project add new sensitive receptors (specifically, schools, day care facilities, hospitals, residential dwellings, and senior-care facilities within an Air Pollution Exposure Zone? Does the project have the potential to emit substantial pollutant concentrations (e.g., backup diesel generators, heavy industry, diesel trucks, etc.)? (*refer to EP _ArcMap > CEQA Catex Determination Layers > Air Pollution Exposure Zone)* |
| ■ | **Hazardous Materials:** If the project site is located on the Maher map or is suspected of containing hazardous materials (based on a previous use such as gas station, auto repair, dry cleaners, or heavy manufacturing, or a site with underground storage tanks): Would the project involve 50 cubic yards or more of soil disturbance - or a change of use from industrial to residential?<br>**Note that a categorical exemption shall not be issued for a project located on the Cortese List** *if the applicant presents documentation of enrollment in the San Francisco Department of Public Health (DPH) Maher program, a DPH waiver from the Maher program, or other documentation from Environmental Planning staff that hazardous material effects would be less than significant (refer to EP_ArcMap > Maher layer).* |
| ☐ | **Transportation:** Does the project involve a child care facility or school with 30 or more students, or a location 1,500 sq. ft. or greater? Does the project have the potential to adversely affect transit, pedestrian and/or bicycle safety (hazards) or the adequacy of nearby transit, pedestrian and/or bicycle facilities? |
| ■ | **Archeological Resources:** Would the project result in soil disturbance/modification greater than two (2) feet below grade in an archeological sensitive area or eight (8) feet in a non-archeological sensitive area? If yes, archeo review is requried (*refer to EP_ArcMap > CEQA Catex Determination Layers > Archeological Sensitive Area)* |
| ☐ | **Subdivision/Lot Line Adjustment:** Does the project site involve a subdivision or lot line adjustment on a lot with a slope average of 20% or more? (*refer to EP_ArcMap > CEQA Catex Determination Layers > Topography*). If yes, Environmental Planning must issue the exemption. |
| ☐ | **Slope = or > 25%:** Does the project involve any of the following: (1) square footage expansion greater than 500 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? (*refer to EP_ArcMap > CEQA Catex Determination Layers > Topography*) **If box is checked, a geotechnical report is required and Environmental Planning must issue the exemption.** |
| ☐ | **Seismic: Landslide Zone:** Does the project involve any of the following: (1) square footage expansion greater than 500 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones)* **If box is checked, a geotechnical report is required and Environmental Planning must issue the exemption.** |
| ☐ | **Seismic: Liquefaction Zone:** Does the project involve any of the following: (1) square footage expansion greater than 500 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones)* **If box is checked, a geotechnical report will likely be required and Environmental Planning must issue the exemption.** |

**Comments and Planner Signature (*optional*):** Don Lewis

PLEASE SEE ATTACHED

## STEP 3: PROPERTY STATUS - HISTORIC RESOURCE

**TO BE COMPLETED BY PROJECT PLANNER**

| **PROPERTY IS ONE OF THE FOLLOWING:** *(refer to Property Information Map)* | |
|---|---|
| ☐ | **Category A:** Known Historical Resource. **GO TO STEP 5.** |
| ■ | **Category B:** Potential Historical Resource (over 45 years of age). **GO TO STEP 4.** |
| ☐ | **Category C:** Not a Historical Resource or Not Age Eligible (under 45 years of age). **GO TO STEP 6.** |

## STEP 4: PROPOSED WORK CHECKLIST

**TO BE COMPLETED BY PROJECT PLANNER**

| **Check all that apply to the project.** | |
|---|---|
| ☐ | 1. **Change of use and new construction.** Tenant improvements not included. |
| ☐ | 2. **Regular maintenance or repair** to correct or repair deterioration, decay, or damage to building. |
| ☐ | 3. **Window replacement** that meets the Department's *Window Replacement Standards*. Does not include storefront window alterations. |
| ☐ | 4. **Garage work.** A new opening that meets the *Guidelines for Adding Garages and Curb Cuts*, and/or replacement of a garage door in an existing opening that meets the Residential Design Guidelines. |
| ☐ | 5. **Deck, terrace construction, or fences** not visible from any immediately adjacent public right-of-way. |
| ☐ | 6. **Mechanical equipment installation** that is not visible from any immediately adjacent public right-of-way. |
| ☐ | 7. **Dormer installation** that meets the requirements for exemption from public notification under *Zoning Administrator Bulletin No. 3: Dormer Windows*. |
| ☐ | 8. **Addition(s)** that are not visible from any immediately adjacent public right-of-way for 150 feet in each direction; does not extend vertically beyond the floor level of the top story of the structure or is only a single story in height; does not have a footprint that is more than 50% larger than that of the original building; and does not cause the removal of architectural significant roofing features. |
| **Note: Project Planner must check box below before proceeding.** | |
| ■ | Project is not listed. **GO TO STEP 5.** |
| ☐ | Project **does not conform** to the scopes of work. **GO TO STEP 5**. |
| ☐ | Project involves **four or more** work descriptions. **GO TO STEP 5.** |
| ☐ | Project involves **less than four** work descriptions. **GO TO STEP 6.** |

## STEP 5: CEQA IMPACTS - ADVANCED HISTORICAL REVIEW

**TO BE COMPLETED BY PROJECT PLANNER**

| **Check all that apply to the project.** | |
|---|---|
| ☐ | 1. Project involves a **known historical resource (CEQA Category A)** as determined by Step 3 and conforms entirely to proposed work checklist in Step 4. |
| ☐ | 2. **Interior alterations to publicly accessible spaces**. |
| ☐ | 3. **Window replacement** of original/historic windows that are not "in-kind" but are consistent with existing historic character. |
| ☐ | 4. **Façade/storefront alterations** that do not remove, alter, or obscure character-defining features. |
| ☐ | 5. **Raising the building** in a manner that does not remove, alter, or obscure character-defining features. |
| ☐ | 6. **Restoration** based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings. |

| | |
|---|---|
| ☐ | 7. **Addition(s)**, including mechanical equipment that are minimally visible from a public right-of-way and meet the *Secretary of the Interior's Standards for Rehabilitation*. |
| ■ | 8. **Other work consistent** with the *Secretary of the Interior Standards for the Treatment of Historic Properties* (*specify or add comments*):<br><br>Installation of four light standards around football field, will not remove or impact football field features or other college structures or building. |
| ☐ | 9. **Other work** that would not materially impair a historic district (specify or add comments):<br><br>*(Requires approval by Senior Preservation Planner/Preservation Coordinator)* |
| ☐ | 10. **Reclassification of property status**. *(Requires approval by Senior Preservation Planner/Preservation*<br>☐ Reclassify to Category A ☐ Reclassify to Category C<br>a. Per HRER or PTR dated *(attach HRER or PTR)*<br>b. Other *(specify)*: |
| **Note: If ANY box in STEP 5 above is checked, a Preservation Planner MUST sign below.** | |
| ■ | **Project can proceed with categorical exemption review**. The project has been reviewed by the Preservation Planner and can proceed with categorical exemption review. **GO TO STEP 6.** |
| **Comments (*optional*):** | |
| **Preservation Planner Signature:** Allison Vanderslice | |

## STEP 6: CATEGORICAL EXEMPTION DETERMINATION

**TO BE COMPLETED BY PROJECT PLANNER**

| | | |
|---|---|---|
| ■ | **No further environmental review is required. The project is categorically exempt under CEQA. There are no unusual circumstances that would result in a reasonable possibility of a significant effect.** | |
| | **Project Approval Action:**<br>Commission Hearing | **Signature:**<br>Don Lewis<br>06/03/2020 |
| | Once signed or stamped and dated, this document constitutes a categorical exemption pursuant to CEQA Guidelines and Chapter 31of the Administrative Code.<br>In accordance with Chapter 31 of the San Francisco Administrative Code, an appeal of an exemption determination can only be filed within 30 days of the project receiving the approval action.<br>Please note that other approval actions may be required for the project. Please contact the assigned planner for these approvals. | |

## CEQA Impacts

The department's staff archeologist conducted preliminary archeological review on 12/28/2018 and determined that no CEQA-significant archeological resources are expected within project-affected soils.

The department's transportation staff reviewed the proposed project and determined that additional transportation review is not required. The proposed addition of lights at the existing facility would not expand the use of such facility. Instead, the proposed lights would shift the existing use to later times in the day and/or days of the week. The project does not propose streetscape changes or additional parking.

The proposed lighting design uses the Light Structure System equipped with total light control for LED fixtures designed and manufactured by Musco Lighting Systems, which requires 36 1,500-watt LED fixtures to achieve the recommended 50 footcandle average. The total light control for LED fixtures are designed to concentrate the light on the field area with minimal light emitted outside the targeted areas. The lighting system is designed to be switched to a "dimmed" setting. This feature would allow the lights to be turned down during events not requiring full lighting. The proposed field lighting system would be equipped with spill and glare shielding.

A lighting study prepared for the proposed project by Musco Lighting illustrates that light measurements at the nearest residences (approximately 100 feet), would drop to less than 1 footcandle due to the shielding and focusing of the lights. The light spillover would not be expected to substantially affect the closest residences. In addition, Verde Design provided analysis of the light impact to neighboring areas. The results also indicate that the light and glare from the proposed lighting system would be nominal on surrounding residential areas.

A geotechnical investigation was prepared by Langan Engineering and Environmental Services (dated June 6, 2019), confirming that the proposed project is feasible. The project's structural drawings would be reviewed by the building department, where it would be determined if further geotechnical review and technical reports are required.

The project sponsor submitted a Maher application to the health department on 6/2/20 and has enrolled in the Maher Program.

The proposed project would not result in substantial permanent increase in ambient noise levels in the project vicinity or expose persons in excess of noise level standards. The proposed project would replace the existing amplification system at the field with a new sound system. The new sound system would be designed to direct sound away from the neighbors during games. In addition, the school would no longer need generator-powered temporary lights. With implementation of the proposed project, it is anticipated that noise levels could decrease.

Based on the planning departments 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.

## STEP 7: MODIFICATION OF A CEQA EXEMPT PROJECT

**TO BE COMPLETED BY PROJECT PLANNER**

In accordance with Chapter 31 of the San Francisco Administrative Code, when a California Environmental Quality Act (CEQA) exempt project changes after the Approval Action and requires a subsequent approval, the Environmental Review Officer (or his or her designee) must determine whether the proposed change constitutes a substantial modification of that project. This checklist shall be used to determine whether the proposed changes to the approved project would constitute a "substantial modification" and, therefore, be subject to additional environmental review pursuant to CEQA.

### MODIFIED PROJECT DESCRIPTION

| Modified Project Description: |
|---|
| |

### DETERMINATION IF PROJECT CONSTITUTES SUBSTANTIAL MODIFICATION

| Compared to the approved project, would the modified project: | |
|---|---|
| ☐ | Result in expansion of the building envelope, as defined in the Planning Code; |
| ☐ | Result in the change of use that would require public notice under Planning Code Sections 311 or 312; |
| ☐ | Result in demolition as defined under Planning Code Section 317 or 19005(f)? |
| ☐ | Is any information being presented that was not known and could not have been known at the time of the original determination, that shows the originally approved project may no longer qualify for the exemption? |
| **If at least one of the above boxes is checked, further environmental review is required.** | |

### DETERMINATION OF NO SUBSTANTIAL MODIFICATION

| ☐ | The proposed modification would not result in any of the above changes. |
|---|---|
| If this box is checked, the proposed modifications are categorically exempt under CEQA, in accordance with prior project approval and no additional environmental review is required. This determination shall be posted on the Planning Department website and office and mailed to the applicant, City approving entities, and anyone requesting written notice. In accordance with Chapter 31, Sec 31.08j of the San Francisco Administrative Code, an appeal of this determination can be filed within 10 days of posting of this determination. | |

| **Planner Name:** | **Date:** |
|---|---|
| | |

# EXHIBIT B

# PLANNING COMMISSION MOTION 20769, JULY 23, 2020

SAN FRANCISCO
**PLANNING DEPARTMENT**

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

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Information:
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# Planning Commission Motion No. 20769

**HEARING DATE: JULY 23, 2020**

| | |
|---|---|
| *Case No.:* | **2018-012648CUA** |
| *Project Address:* | **2001 37th Avenue** |
| *Zoning:* | Residential-House, One Family (RH-1)<br>40-X Height and Bulk District |
| *Block/Lot:* | 2094/006 |
| *Applicant:* | St. Ignatius College Preparatory<br>Ken Stupi<br>2001 37th Avenue<br>San Francisco, CA, 94116 |
| *Property Owner:* | St. Ignatius College Preparatory<br>2001 37th Avenue<br>San Francisco, CA, 94116 |
| *Staff Contact:* | Jeff Horn – (415) 575-6925<br>jeffrey.horn@sfgov.org |

**ADOPTING FINDINGS RELATING TO THE APPROVAL OF A CONDITIONAL USE AUTHORIZATION & PLANNED UNIT DEVELOPMENT PURSUANT TO PLANNING CODE SECTIONS 209.1, 303 AND 304, TO AMEND AN EXISTING PLANNED UNIT DEVELOPMENT AND ALLOW A MODIFICATION TO THE REQUIREMENTS FOR REAR YARD (PLANNING CODE SECTION 134) FOR THE EXPANSION OF A PRIVATE SECONDARY SCHOOL (ST. IGNATIUS COLLEGE PREPARATORY) THROUGH THE ADDITION OF FOUR 90-FOOT TALL LIGHT STANDARDS TO THE J.B. MURPHY FIELD ATHLETIC STADIUM AND TO INSTALL A NEW VERIZON MACRO WIRELESS TELECOMMUNICATIONS SERVICE FACILITY ATTACHED TO THE NORTHWEST LIGHT STANDARD LOCATED AT 2001 37TH AVENUE, LOT 006 IN ASSESSOR'S BLOCK 2094, WITHIN THE RH-1 (RESIDENTIAL-HOUSE, ONE FAMILY) ZONING DISTRICT AND A 40-X HEIGHT AND BULK DISTRICT, AND TO ADOPT FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.**

## PREAMBLE

On February 8, 2018, Ken Stupi, VP of Finance & Administration at St. Ignatius College Preparatory (hereinafter "Project Sponsor") filed an application with the Planning Department (hereinafter "Department") for Conditional Use Authorization to amend an existing Planned Unit Development for an existing secondary school (St. Ignatius College Preparatory) to allow the addition of four 90-foot tall outdoor light standards to the J.B. Murphy Field Stadium and On March 31, 2020, Chad Christie of Ridge Communications, representing Verizon Wireless, filed a supplemental Conditional Use Authoritarian application for a Wireless Telecommunication Services Facility to be attached to the northwest light standard (hereinafter "Project") at 2001 37th Avenue, Block 2094 Lot 006(hereinafter "Project Site").

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On June 3, 2020 the project was determined to be exempt from the California Environmental Quality Act ("CEQA") as a Class 1 and Class 3, Existing Facilities and New Construction, under CEQA as described in the determination contained in the Planning Department files for this Project.

On July 23, 2020, the San Francisco Planning Commission (hereinafter "Commission") conducted a duly noticed public hearing at a regularly scheduled meeting on Conditional Use Application No. 2018-012648CUA.

The Planning Department Commission Secretary is the custodian of records; the File for Record No. 2018-12648CUA is located at 1650 Mission Street, Suite 400, San Francisco, California.

The Commission has heard and considered the testimony presented to it at the public hearing and has further considered written materials and oral testimony presented on behalf of the applicant, Department staff, and other interested parties. The Commission discussed the Monday through Thursday use of the lights and modified Condition of Approval #11 to require the lights to be dimmed no later than 8:30 pm and turned off no later than 9:00 pm for up 150 nights per year. Affiliates of the school may use the lights on up to 20 of the 150 evenings.

**MOVED,** that the Commission hereby authorizes the Conditional Use Authorization as requested in Application No. 2018-12648CUA, subject to the conditions contained in "EXHIBIT A" of this motion, based on the following findings:

## FINDINGS

Having reviewed the materials identified in the preamble above, and having heard all testimony and arguments, this Commission finds, concludes, and determines as follows:

1. The above recitals are accurate and constitute findings of this Commission.

2. **Project Description.** The Project proposes the expansion of an existing private secondary school (St. Ignatius College Preparatory [SI] ) to by adding four (4) 90-foot tall light standards differing fixture arrays to the J.B. Murphy Field Stadium. The two poles on the west side of the field (closest to 39th avenue) will have 12 fixtures (9 at the top of the pole, 1 bleacher/emergency egress fixture at 65' and 2 BallTracker fixtures at approximately 15 feet). The two poles on the east side of the field (in front of the home bleachers) will mirror the west side poles in terms of number of fixtures and fixture locations. The four poles will be situated symmetrically in a rectangular formation surrounding the football field (at approximately the 10-yard line). Additional safety lighting will be added for the bleachers and sidewalk surrounding the field.

   The addition of the lights will allow for weekday and weekend evening use of the field for practice, games and events. As approved, on Monday through Thursday nights the lights shall be dimmed no later than 8:30 pm and turned off no later than 9:00 pm and on up 20 evenings per year, the lights may remain on until 10:00 pm.

   On the proposed northwest standard, Verizon Wireless is seeking to install and operate an unmanned macro wireless communications facility. The physical components of the projects

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consist of nine (9) Antennas, six (6) Remote Radio Units located on the light standard, two (2) Surge Suppressors and ancillary equipment located within a 12-foot by 28-foot, 336 square foot, fenced compound on the ground adjacent to the north of the light standard.

3. **Site Description and Present Use.** SI has been operated by the Society of Jesus and been in San Francisco since 1855 and has been located at 2001 37th Avenue in the Sunset District of San Francisco since 1969 (CU66.005). Originally an all-boys schools, SI became co-ed in 1989 and made improvements that were undertaken as part of the Planned Unit Development, the project included the gymnasium and pool, a student center and a parking structure. (Motion No. 12024). Further amendments to the Project's Planned Unit Development were made in 2004 to add lights to the upper sports field (Motion No. 16770) and to expand the student center (Motion No. 17115). In 2018 a new 100-student, 6th through 8th grade middle school, the Fr. Sauer Academy, was established (Motion No. 20204).

   The SI campus occupies a 495,470 square foot parcel and is developed with approximately 290,595 square feet of secondary school facilities. J.B. Murphy Field athletic stadium is located at the southwest corner of the campus, with frontage on 37th Avenue and Rivera Street. The stadium consists of a football field with artificial turf and a six-lane synthetic track that surrounds the football field perimeter. There is a seating capacity of 2008 – a 1,234 seat home bleacher section which includes a 20 person press box and a 774 seat visitors' section. There are two storage buildings located at the northwest corner of the project site, a classroom building and weight room adjacent to the northeast corner of the site. The project site also includes a free-standing scoreboard located in the south end of the football field and various other track facilities located near the north football field end zone. The project site is surrounded by a steel fence with four locked access gates located on-site: three locked gates on 39th avenue and one locked gate on Rivera Street.

   Field usage has expanded over the years with the addition of coed sports. The field is currently used Monday through Sunday on an annual basis for approximately 100 games/meets (including pre-season), up to 20 playoff games, 750 practices and 50 events for outside not-for-profit groups.

4. **Surrounding Properties and Neighborhood.** The AP Gianni Middle School, Ortega Branch Library, West Sunset Playground and Fields, and the Sunset Elementary School are located to the north, and the San Francisco Park and Recreation Sports fields to the east. The Sunset Parkway, consisting of 36th Avenue, Sunset Boulevard, 37th Avenue and landscaped medians are located to the east of the project. The predominant uses in the immediate area are two-story, low density, mostly single-family residential homes, including directly west of the sports field across 39th Avenue and to the south across Rivera Street.

5. **Public Outreach and Comments.** The Project Sponsor maintains neighborhood outreach mailing and email lists to provide school and project related updates to the community and have a "Good Neighbor" program with a corresponding website. The Project Sponsor has held four (4) community meetings specific to the Stadium Lights projects, as well as other outreach and communication efforts.

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Per Planning Commission policy (Resolution No. 16539), Verizon held a virtual public outreach meeting on Wednesday, April 29, 2020, from 6:00PM – 7:00PM on the proposed WTS facility. The Department received 4 correspondences from the public regarding the proposed project and the facilitation of this meeting. Verizon had noticed an in-person meeting for March 18, 2020, which had to be cancelled due to the City's March 16th, 2020, *Shelter in Place* Health Order.

The Department has received approximately 105 letters of support of the lights and nighttime use of the sports field, most letters received were from residents of the Sunset neighborhood and approximately 32 letters in opposition to the project with concerns of impacts from lights and increased traffic and parking, most of which are from adjacent residents of the surrounding streets, including a letter with supplemental materials submitted by the Saint Ignatius Neighborhood Association and a online petition with 150 signatures.

6. **Past History and Actions.** The Planning Commission adopted the *Wireless Telecommunications Services (WTS) Facilities Siting Guidelines* ("Guidelines") for the installation of wireless telecommunications facilities in 1996. These Guidelines set forth the land use policies and practices that guide the installation and approval of wireless facilities throughout San Francisco. A large portion of the Guidelines was dedicated to establishing location preferences for these installations. The Board of Supervisors, in Resolution No. 635-96, provided input as to where wireless facilities should be located within San Francisco. The Guidelines were updated by the Commission in 2003 and again in 2012, requiring community outreach, notification, and detailed information about the facilities to be installed.

   Section 8.1 of the Guidelines outlines Location Preferences for wireless facilities. There are five primary areas were the installation of wireless facilities should be located:

   1. Publicly-used Structures: such facilities as fire stations, utility structures, community facilities, and other public structures;
   2. Co-Location Site: encourages installation of facilities on buildings that already have wireless installations;
   3. Industrial or Commercial Structures: buildings such as warehouses, factories, garages, service stations;
   4. Industrial or Commercial Structures: buildings such as supermarkets, retail stores, banks; and
   5. Mixed-Use Buildings in High Density Districts: buildings such as housing above commercial or other non-residential space.

   Section 8.1 of the WTS Siting Guidelines further stipulates that the Planning Commission will not approve WTS applications for Preference 5 or below Location Sites unless the application describes (a) what publicly-used building, co-location site or other Preferred Location Sites are located within the geographic service area; (b) what good faith efforts and measures were taken to secure these more Preferred Locations, (c) explains why such efforts were unsuccessful; and (d) demonstrates that the location for the site is essential to meet demands in the geographic service area and the Applicant's citywide networks.

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Before the Planning Commission can review an application to install a wireless facility, the Project Sponsor must submit a five-year facilities plan, which must be updated biannually, an emissions report and approval by the Department of Public Health, Section 106 Declaration of Intent, an independent evaluation verifying coverage and capacity, a submittal checklist and details about the facilities to be installed.

Under Section 704(B)(iv) of the 1996 Federal Telecommunications Act, local jurisdictions cannot deny wireless facilities based on Radio Frequency (RF) radiation emissions so long as such facilities comply with the FCC's regulations concerning such emissions.

7. **Location Preference.** The WTS *Guidelines* identify different types of zoning districts and building uses for the siting of wireless telecommunications facilities. Based on the zoning and land use, the proposed WTS facility is at a Location Preference 2 Site (Co-Location Site) according to the WTS *Guidelines*, making it a desired location.

8. **Radio Waves Range.** The Project Sponsor has stated that the proposed wireless network is designed to address coverage and capacity needs in the area. The network will operate at 193 watts for 28 GHz, 172 watts for CBRS, 5,250 watts for AWS, 5,130 watts for PCS, 4,170 watts for cellular, and 3,630 watts for 700 MHz, which are regulated by the Federal Communications Commission (FCC) and must comply with the FCC-adopted health and safety standards for electromagnetic radiation and radio frequency radiation.

9. **Radiofrequency (RF) Emissions:** The Project Sponsor retained Hammett and Edison, Inc, a radio engineering consulting firm, to prepare a report describing the expected RF emissions from the proposed facility. Pursuant to the Guidelines, the Department of Public Health reviewed the report and determined that the proposed facility complies with the standards set forth in the Guidelines.

10. **Department of Public Health Review and Approval.** The Project was referred to the Department of Public Health (DPH) for emissions exposure analysis. Radio-Frequency (RF) levels from the proposed Verizon Wireless transmitters at any nearby publicly accessible building or area would 11% of the FCC public exposure limit.

    There are no antennas existing operated by Verizon installed on the roof top of the building at 2001 37th Avenue. Existing RF levels at ground level were around 1% of the FCC public exposure limit. No other antennas were observed within 100 feet of this site. Verizon proposes to install 12 new antennas. The antennas are mounted at a height of 45- 63 feet above the ground. The estimated ambient RF field from the proposed Verizon transmitters at ground level is calculated to be 0.032 mW/sq cm., which is 5.2 % of the FCC public exposure limit. The three dimensional perimeter of RF levels equal to the public exposure limit extends 94 feet and does not reach any publicly accessible areas. Warning signs must be posted at the antennas and roof access points in English, Spanish and Chinese. Workers should not have access to within 36 feet of the front of the antennas while they are in operation.

11. **Coverage and Capacity Verification.** The maps, data, and conclusion provided by Verizon Wireless to demonstrate the need for outdoor and indoor coverage and capacity have been

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determined by Hammett and Edison, Inc, an engineering consultant and independent third party, to accurately represent the carrier's present and post-installation conclusions.

12. **Maintenance Schedule**. The facility would operate without on-site staff but with a maintenance crew visiting the property to service and monitor the facility.

13. **Planning Code Compliance.** The Commission finds that the Project is consistent with the relevant provisions of the Planning Code in the following manner:

    A. **Use.** Planning Code Section 209.1 requires Conditional Use Authorization for a school use and for a macro WTS facility within the RH-1 (Residential House, One-Family) Zoning District. Conditional Use Authorization is also required for a Planned Unit Development pursuant to Planning Code Section 304.

    *The Project is requesting Conditional Use Authorization from the Planning Commission amend the existing PUD and to allow for the construction of four light standards and to allow a macro WTS facility.*

    B. **Rear Yard.** Planning Code Section 134 requires a minimum rear yard equal to 25 percent of the total lot depth of the lot to be provided opposite the Ocean Avenue frontage.

    *The Project seeks to encroach into the rear yard by constructing two 90-foot tall light standards and a macro WTS facility with ancillary equipment located within a 12-foot by 28-foot, 336 square foot, fenced compound on the ground adjacent to the northwest light standard. As a result, the Project Sponsor is requesting a rear yard modification per the criteria and limitations provided in Planning Code Section 304, described below.*

    C. **Review of proposed buildings and structures exceeding a height of 40 feet in RH districts, or more than 50 feet in RM and RC Districts.** Planning Code Section 253 requires that any building or structure exceeding 40 feet in height in a RH District, shall be permitted only upon approval by the Planning Commission according to the procedures for conditional use approval.

    *Per Planning Code Sections 260(b)(2)(J), "Warning and navigation signals and beacons, light standards and similar devices..." and 260(b)(2)(I) "Wireless Telecommunications Services Facilities and other antennas…" are exempt from height limits established by the Planning Code. The project is seeking approval from the Planning Commission due to the Conditional Use requirements of the expansion of the school and existing PUD and a new WTS facility with a RH-1 District.*

    D. **Height.** Planning Code Section 260 requires that all structures be no taller than the height prescribed in the subject height and bulk district. The proposed project is located in a 40-X Height and Bulk District, with a 40-foot height limit.

    *Per Planning Code Section 260(b)(2)(J), "Warning and navigation signals and beacons, light standards and similar devices..." and (I) "Wireless Telecommunications Services Facilities and other antennas…" are exempt from height limits established by the Planning Code.*

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14. **Conditional Use Findings.** Planning Code Section 303 establishes criteria for the Planning Commission to consider when reviewing applications for Conditional Use authorization. On balance, the project complies with said criteria in that:

    A. The proposed new uses and building, at the size and intensity contemplated and at the proposed location, will provide a development that is necessary or desirable, and compatible with, the neighborhood or the community.

    *The Project is, on balance, consistent with the Objectives and Policies of the General Plan. An addition of light standards and evening use of the sports field is not expected to adversely increase or impact traffic and parking in the neighborhood. The Project maintains and expands an educational and recreational use, which are uses that support of families and children in San Francisco. The WTS facility is generally desirable and compatible with the surrounding neighborhood because the Project will not conflict with the existing uses of the property and will be designed to be compatible with the surrounding neighborhood. The overall location, setback from public streets, height and design of the proposed facility, including visible screening elements is situated to avoid intrusion into public vistas, and to ensure harmony with the existing neighborhood character and promote public safety. Recent drive tests in the subject area conducted by the Verizon Wireless Radio Frequency Engineering Team provide that the Project Site is a preferable location, based on factors including quality of coverage and aesthetics.*

    *The Project is desirable because it promotes the operation of a neighborhood-serving school. The Project would be consistent with the mixed character of the immediate neighborhood and would assist in maintaining the area's diverse economic base. The Department also finds the project to be necessary, desirable, and compatible with the surrounding neighborhood, and not to be detrimental to persons or adjacent properties in the vicinity.*

    B. The proposed project will not be detrimental to the health, safety, convenience or general welfare of persons residing or working in the vicinity. There are no features of the project that could be detrimental to the health, safety or convenience of those residing or working the area, in that:

    i. Nature of proposed site, including its size and shape, and the proposed size, shape and arrangement of structures;

    *The height and bulk of the existing buildings will remain the same and the Project will not alter the existing appearance or character of the project's vicinity. The proposed work will not affect the any existing building envelope.*

    ii. The accessibility and traffic patterns for persons and vehicles, the type and volume of such traffic, and the adequacy of proposed off-street parking and loading;

    *The proposed addition of field lights at the existing facility would not expand the use of such facility. Instead, the proposed lights would shift the existing use to later times in the day and/or days of the week. Additionally, the Planning Code does not require parking or loading for a WTS facility. The*

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*proposed use is designed to meet the needs of the immediate neighborhood and should not generate significant amounts of vehicular trips from the immediate neighborhood or citywide.*

iii. The safeguards afforded to prevent noxious or offensive emissions such as noise, glare, dust and odor;

*The proposed lighting design uses the Light Structure System equipped with total light control for LED fixtures. The total light control for LED fixtures are designed to concentrate the light on the field area with minimal light emitted outside the targeted areas. The lighting system is designed with a feature allowing the lights to be switched to a "dimmed" setting. This feature would allow the lights to be turned down during events not requiring full lighting. The proposed field lighting system would be equipped with spill and glare shielding. Light and glare from the proposed lighting system would be nominal on surrounding residential areas.*

*While some noise and dust may result from the installation of the standards and the WTS antennas and transceiver equipment, noise or noxious emissions from continued use are not likely to be significantly greater than ambient conditions due to the operation of the lights and wireless communication network.*

*A community liaison will also be appointed by the project sponsor to address any related concerns if construction occurs.*

iv. Treatment given, as appropriate, to such aspects as landscaping, screening, open spaces, parking and loading areas, service areas, lighting and signs;

*The project requires no additional street treatment. Landscape screening exists between the project's western property line and the proposed leasing area for the WTS facilities accessory equipment. The proposed field lighting system would be equipped with spill and glare shielding. Light and glare from the proposed lighting system would be nominal on surrounding residential areas.*

C. That the use as proposed will comply with the applicable provisions of the Planning Code and will not adversely affect the General Plan.

*The Project is, on balance, consistent with the Objectives and Policies of the General Plan. The Project maintains and expands educational and recreational uses, which are uses in support of families and children in San Francisco. The light system would have a nominal impact of light and glare to the surrounding residential areas. Nighttime use of the field is not expected to adversely impact traffic and parking in the neighborhood. The Project is desirable because it promotes the operation of a neighborhood-serving school.*

*The Department finds that the Project is, on balance, consistent with the Wireless Telecommunications Services Facilities Siting Guidelines, and the Objectives and Policies of the General Plan. The proposed WTS facility would be screened from view by virtue of proposed enclosures, and their placement on light standard. The proposal would not significantly detract from views of the Subject proporty or from views of other surrounding buildings, nor would it detract from adjacent streetscapes, and vistas.*

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*Overall, the Department also finds the project to be necessary, desirable, and compatible with the surrounding neighborhood, and not to be detrimental to persons or adjacent properties in the vicinity. The Project complies with all relevant requirements and standards of the Planning Code and is consistent with objectives and policies of the General Plan as detailed below.*

D. That the use as proposed would provide development that is in conformity with the purpose of the applicable Use District.

*The Project complies with all relevant requirements and standards of the Planning Code and is consistent with objectives and policies of the General Plan as detailed below. The Project is conditionally permitted within the RH-1 Zoning District and complies with and promotes many of the Objectives and Policies of the General Plan, as detailed below.*

6. **Planning Code Section 304** establishes procedures for Planned Unit Developments, which are intended for projects on sites of considerable size, including an area of not less than half-acre, developed as integrated units and designed to produce an environment of stable and desirable character, which will benefit the occupants, the neighborhood and the City as a whole. In the 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 provisions contained elsewhere in the Planning Code.

A. **Modifications.** The Project Sponsor requests the following modification from the requirements of the Planning Code. These modifications are listed below, along with reference to the relevant discussion for each modification.

*<u>Rear Yard:</u> Since the Project Site is larger than a half-acre, the Project may seek approval as a Planned Unit Development (PUD) per Planning Code Section 304. Under a PUD, the Commission may grant modifications from certain Planning Code requirements for projects that produce an environment of stable and desirable character which will benefit the occupants, the neighborhood and the City as a whole. The Project requests modifications from the Planning Code requirements for rear yard (Planning Code Section 134). The two western light standards and Verizon's ancillary equipment are located within the sites' required 25% rear yard (137 feet, 6 inches).*

B. **Criteria and Limitations** Section 304(d) establishes criteria and limitations for the authorization of PUDs over and above those applicable to Conditional Uses in general and contained in Section 303 and elsewhere in the Code. On balance, the Project complies with said criteria in that it:

1) Affirmatively promotes applicable objectives and policies of the General Plan;

*The Project complies with the objectives and policies of the General Plan, as detailed below.*

2) Provides off-street parking adequate for the occupancy proposes.



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*The Project is not required to provide off-street parking.*

3) Provide open space usable by the occupants and, where appropriate, by the general public, at least equal to the open spaces required by this Code;

*The Project far exceeds the required amount of open space for the school through outdoor courtyards and fields.*

4) Be limited in dwelling unit density to less than the density that would be allowed by Article 2 of this Code for a district permitting a greater density, so that the Planned Unit Development will not be substantially equivalent to a reclassification of property;

*No dwelling units are proposed.*

5) In R Districts, include commercial uses only to the extent that such uses are necessary to serve residents of the immediate vicinity, subject to the limitations for NC-1 Districts under this Code, and in RTO Districts include commercial uses only according to the provisions of Section 230 of this Code;

*The Project does not contain or propose commercial uses.*

6) Under no circumstances be excepted from any height limit established by Article 2.5 of this Code, unless such exception is explicitly authorized by the terms of this Code. In the absence of such an explicit authorization, exceptions from the provisions of this Code with respect to height shall be confined to minor deviations from the provisions for measurement of height in Sections 260 and 261 of this Code, and no such deviation shall depart from the purposes or intent of those sections.

*The Project is not requesting any exceptions to the height limits. Per Planning Code Section 260(b)(2)(J), "Warning and navigation signals and beacons, light standards and similar devices..." and (I) "Wireless Telecommunications Services Facilities and other antennas…" are exempt from height limits established by Article 2.5 of the Planning Code.*

7) In NC Districts, be limited in gross floor area to that allowed under the floor area ratio limit permitted for the district in Section 124 and Article 7 of this Code;

*The Project is not located within a NC District.*

8) In NC Districts, not violate the use limitations by story set forth in Article 7 of this Code; and

*The Project is not located within a NC District.*

9) In RTO and NCT Districts, include the extension of adjacent alleys or streets onto or through the site, and/or the creation of new publicly-accessible streets or alleys through

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the site as appropriate, in order to break down the scale of the site, continue the surrounding existing pattern of block size, streets and alleys, and foster beneficial pedestrian and vehicular circulation.

*The Project is not located in an RTO or NCT District.*

10) Provide Street trees as per the requirements of Section 138.1 of the Code.

*Per Planning Code Section 138.1(c)(1), the Department of Public Works is responsible for reviewing and guiding any new street trees present on the project site.*

11) Provide landscaping and permeable surfaces in any required setbacks in accordance with Section 132 (g) and (h).

*Project is not subject to the requirements of Planning Code Section 132(g) and (h).*

15. **General Plan Compliance.** The Project is, on balance, consistent with the following Objectives and Policies of the General Plan:

## COMMERCE & INDUSTRY ELEMENT

**OBJECTIVE 7:**
ENHANCE SAN FRANCISCO'S POSITION AS A NATIONAL AND REGIONAL CENTER FOR GOVERNMENTAL, HEALTH, AND EDUCATIONAL SERVICES.

**Policy 7.2**
Encourage the extension of needed health and educational services, but manage expansion to avoid or minimize disruption of adjacent residential areas.

*The Project maintains and expands an educational use, which is a use in support of families and children in San Francisco. The Project is desirable because it promotes the operation of a neighborhood-serving school. More flexible use of the athletics facilities will also provide greater recreational opportunities to a diverse body of students drawn from the community, thereby improving the educational services provided to the City as a whole.*

**Policy 7.3**
Promote the provision of adequate health and educational services to all geographical districts and cultural groups in the city.

*The Project will enhance the educational services available to residents of the local area neighborhoods as well as the City at large. St. Ignatius College Preparatory will continue to provide tuition assistance and outreach to a socially and economically diverse community.*

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## HOUSING ELEMENT

**OBJECTIVE 11:**
SUPPORT AND RESPECT THE DIVERSE AND DISTINCT CHARACTER OF SAN FRANCISCO'S NEIGHBORBORHOODS.

**Policy 11.8:**
Consider a neighborhood's character when integrating new uses, and minimize disruption caused by expansion of institutions into residential areas.

*The Project will minimize disruption by expanding the school vertically on the existing Campus, which has been a part of the neighborhood since 1969.*

## COMMERCE AND INDUSTRY ELEMENT

### Objectives and Policies

**OBJECTIVE 1:**
MANAGE ECONOMIC GROWTH AND CHANGE TO ENSURE ENHANCEMENT OF THE TOTAL CITY LIVING AND WORKING ENVIRONMENT.

**Policy 1.1:**
Encourage development, which provides substantial net benefits and minimizes undesirable consequences. Discourage development, which has substantial undesirable consequences that cannot be mitigated.

**Policy 1.2:**
Assure that all commercial and industrial uses meet minimum, reasonable performance standards.

*The Project will enhance the total city living and working environment by providing recreational and communication services for residents and workers within the City. Additionally, the Project would comply with Federal, State and Local performance standards.*

**OBJECTIVE 2:**
MAINTAIN AND ENHANCE A SOUND AND DIVERSE ECONOMIC BASE AND FISCAL STRUCTURE FOR THE CITY.

**Policy 2.1:**
Seek to retain existing commercial and industrial activity and to attract new such activity to the city.

**Policy 2.3:**
Maintain a favorable social and cultural climate in the city in order to enhance its attractiveness as a firm location.

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*The Site will be an integral part of a new wireless telecommunications network that will enhance the City's diverse economic base.*

**OBJECTIVE 4:**
IMPROVE THE VIABILITY OF EXISTING INDUSTRY IN THE CITY AND THE ATTRACTIVENESS OF THE CITY AS A LOCATION FOR NEW INDUSTRY.

**Policy 4.1:**
Maintain and enhance a favorable business climate in the City.

**Policy 4.2:**
Promote and attract those economic activities with potential benefit to the City.

*The Project will benefit the City by enhancing the business climate through improved communication services for residents and workers and hosting sporting events*

**VISITOR TRADE**

**OBJECTIVE 8:**
ENHANCE SAN FRANCISCO'S POSITION AS A NATIONAL CENTER FOR CONVENTIONS AND VISITOR TRADE.

**Policy 8.3:**
Assure that areas of particular visitor attraction are provided with adequate public services for both residents and visitors.

*The Project will ensure that residents and visitors have adequate public service in the form of Verizon Wireless telecommunications.*

## COMMUNITY SAFETY ELEMENT

### Objectives and Policies

**OBJECTIVE 3:**
ESTABLISH STRATEGIES TO ADDRESS THE IMMEDIATE EFFECTS OF A DISASTER.

**Policy 1.20**
Increase communication capabilities in preparation for all phases of a disaster and ensure communication abilities extend to hard-to-reach areas and special populations.

**Policy 2.4**
Bolster the Department of Emergency Management's role as the City's provider of emergency planning and communication, and prioritize its actions to meet the needs of San Francisco.

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**Policy 2.15**
Utilize advancing technology to enhance communication capabilities in preparation for all phases of a disaster, particularly in the high-contact period immediately following a disaster.

**Policy 3.7:**
Develop a system to convey personalized information during and immediately after a disaster.

*The Project will enhance the ability of the City to protect both life and property from the effects of a fire or natural disaster by providing communication services.*

16. **Planning Code Section 101.1(b)** establishes eight priority-planning policies and requires review of permits for consistency with said policies. On balance, the project complies with said policies in that:

    A. That existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses be enhanced.

    *The project site does not possess any neighborhood-serving retail uses. The wireless communications network will enhance personal communication services for businesses and customers in the surrounding area.*

    B. That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.

    *The expansion to an existing school has been designed to be sensitive to the surrounding neighborhood character. Overall, the school use is beneficial and supports children and families in the City.*

    C. That the City's supply of affordable housing be preserved and enhanced,

    *The Project does not currently possess any existing affordable housing.*

    D. That commuter traffic does not impede MUNI transit service or overburden our streets or neighborhood parking.

    *The school will manage and supervise traffic and parking adjacent to the school during events, in order to discourage double parking and promote an orderly flow of traffic. The project would change the times that event attendees visit the site, this would not result in increased MUNI ridership, the Project is not expected to materially impair or affect MUNI service or traffic in the neighborhood.*

    E. That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced.

    *The Project does not include commercial office development.*

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F. That the City achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake.

*The Project will be designed and will be constructed to conform to the structural and seismic safety requirements of the Building Code. This proposal will not impact the property's ability to withstand an earthquake.*

G. That landmarks and historic buildings be preserved.

*Currently, the Project Site does not contain any City Landmarks or historic buildings.*

H. That our parks and open space and their access to sunlight and vistas be protected from development.

*The proposed light standards would be greater than 40 feet tall but would not be of sufficient bulk to cast substantial shadow. Although the Project may cast shadow on the adjacent public park, the adjacent public park (West Sunset Fields) is still afforded access to sunlight, which should not dramatically affect the use and enjoyment of this park. Therefore, no shadow effects would ensue as a result of the proposed project.*

17. The Project is consistent with and would promote the general and specific purposes of the Code provided under Section 101.1(b) in that, as designed, the Project would contribute to the character and stability of the neighborhood and would constitute a beneficial development.

18. The Commission hereby finds that approval of the Conditional Use Authorization would promote the health, safety and welfare of the City.

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## DECISION

That based upon the Record, the submissions by the Applicant, the staff of the Department and other interested parties, the oral testimony presented to this Commission at the public hearings, and all other written materials submitted by all parties, the Commission hereby **APPROVES Conditional Use Authorization Application No. 2018-012648CUA** subject to the following conditions attached hereto as "EXHIBIT A" in general conformance with plans on file, dated September 18, 2018 for the light standards and April 16, 2019 for the WTS, and stamped "EXHIBIT B", which is incorporated herein by reference as though fully set forth**.**

**APPEAL AND EFFECTIVE DATE OF MOTION:** Any aggrieved person may appeal this Conditional Use Authorization to the Board of Supervisors within thirty (30) days after the date of this Motion. The effective date of this Motion shall be the date of this Motion if not appealed (after the 30-day period has expired) OR the date of the decision of the Board of Supervisors if appealed to the Board of Supervisors. For further information, please contact the Board of Supervisors at (415) 554-5184, City Hall, Room 244, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102.

**Protest of Fee or Exaction:** You may protest any fee or exaction subject to Government Code Section 66000 that is imposed as a condition of approval by following the procedures set forth in Government Code Section 66020. The protest must satisfy the requirements of Government Code Section 66020(a) and must be filed within 90 days of the date of the first approval or conditional approval of the development referencing the challenged fee or exaction. For purposes of Government Code Section 66020, the date of imposition of the fee shall be the date of the earliest discretionary approval by the City of the subject development.

If the City has not previously given Notice of an earlier discretionary approval of the project, the Planning Commission's adoption of this Motion, Resolution, Discretionary Review Action or the Zoning Administrator's Variance Decision Letter constitutes the approval or conditional approval of the development and the City hereby gives **NOTICE** that the 90-day protest period under Government Code Section 66020 has begun. If the City has already given Notice that the 90-day approval period has begun for the subject development, then this document does not re-commence the 90-day approval period.

I hereby certify that the Planning Commission ADOPTED the foregoing Motion on July 23, 2020.

Jonas P. Ionin
Commission Secretary

AYES: Chan, Diamond, Imperial, Johnson, Koppel, Moore

NAYS: Fung

ABSENT: None

ADOPTED: July 23, 2020

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# EXHIBIT A

## AUTHORIZATION

This authorization is for a conditional use to amend an existing Planned Unit Development with a rear yard modification to allow the expansion of a private secondary school (St. Ignatius College Preparatory) by constructing four light standards and a new macro wireless telecommunications facility, located at 2001 37th Avenue, Lot 006 in Assessor's Block 2094, pursuant to Planning Code Section(s) 209.1, 303 and 304 within the Residential-House One Family (RH-1) Zoning District and a 40-X Height and Bulk District; in general conformance with plans, dated September 18, 2018 for the light standards and April 16, 2019 for the WTS, and stamped "EXHIBIT B" included in the docket for Record No. **2018-012648CUA** and subject to conditions of approval reviewed and approved by the Commission on **July 23, 2020** under Motion No. **20769**. This authorization and the conditions contained herein run with the property and not with a particular Project Sponsor, business, or operator.

## RECORDATION OF CONDITIONS OF APPROVAL

Prior to the issuance of the building permit or commencement of use for the Project the Zoning Administrator shall approve and order the recordation of a Notice in the Official Records of the Recorder of the City and County of San Francisco for the subject property. This Notice shall state that the project is subject to the conditions of approval contained herein and reviewed and approved by the Planning Commission on **July 23, 2020** under Motion No **20769**.

## PRINTING OF CONDITIONS OF APPROVAL ON PLANS

The conditions of approval under the 'Exhibit A' of this Planning Commission Motion No. **20769** shall be reproduced on the Index Sheet of construction plans submitted with the site or building permit application for the Project. The Index Sheet of the construction plans shall reference to the Conditional Use authorization and any subsequent amendments or modifications.

## SEVERABILITY

The Project shall comply with all applicable City codes and requirements. If any clause, sentence, section or any part of these conditions of approval is for any reason held to be invalid, such invalidity shall not affect or impair other remaining clauses, sentences, or sections of these conditions. This decision conveys no right to construct, or to receive a building permit. "Project Sponsor" shall include any subsequent responsible party.

## CHANGES AND MODIFICATIONS

Changes to the approved plans may be approved administratively by the Zoning Administrator. Significant changes and modifications of conditions shall require Planning Commission approval of a new Conditional Use authorization.

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# Conditions of Approval, Compliance, Monitoring, and Reporting

## PERFORMANCE

1. **Validity.** The authorization and right vested by virtue of this action is valid for three (3) years from the effective date of the Motion. The Department of Building Inspection shall have issued a Building Permit or Site Permit to construct the project and/or commence the approved use within this three-year period.
   *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

2. **Expiration and Renewal.** Should a Building or Site Permit be sought after the three (3) year period has lapsed, the project sponsor must seek a renewal of this Authorization by filing an application for an amendment to the original Authorization or a new application for Authorization. Should the project sponsor decline to so file, and decline to withdraw the permit application, the Commission shall conduct a public hearing in order to consider the revocation of the Authorization. Should the Commission not revoke the Authorization following the closure of the public hearing, the Commission shall determine the extension of time for the continued validity of the Authorization.
   *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

3. **Diligent Pursuit.** Once a site or Building Permit has been issued, construction must commence within the timeframe required by the Department of Building Inspection and be continued diligently to completion. Failure to do so shall be grounds for the Commission to consider revoking the approval if more than three (3) years have passed since this Authorization was approved.
   *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

4. **Extension.** All time limits in the preceding three paragraphs may be extended at the discretion of the Zoning Administrator where implementation of the project is delayed by a public agency, an appeal or a legal challenge and only by the length of time for which such public agency, appeal or challenge has caused delay.
   *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

5. **Conformity with Current Law.** No application for Building Permit, Site Permit, or other entitlement shall be approved unless it complies with all applicable provisions of City Codes in effect at the time of such approval.
   *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

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## DESIGN – COMPLIANCE AT PLAN STAGE

6. **Final Materials.** The Project Sponsor shall continue to work with Planning Department on the building design. Final materials, glazing, color, texture, landscaping, and detailing shall be subject to Department staff review and approval. The architectural addenda shall be reviewed and approved by the Planning Department prior to issuance.
   *For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

7. **Lighting Plan.** The Project Sponsor shall submit an exterior lighting plan to the Planning Department prior to Planning Department approval of the building / site permit application.
   *For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

8. **Plan Drawings - WTS**. Prior to the issuance of any building or electrical permits for the installation of the facilities, the Project Sponsor shall submit final scaled drawings for review and approval by the Planning Department ("Plan Drawings"). The Plan Drawings shall describe:
   A. Structure and Siting. Identify all facility related support and protection measures to be installed. This includes, but is not limited to, the location(s) and method(s) of placement, support, protection, screening, paint and/or other treatments of the antennas and other appurtenances to ensure public safety, insure compatibility with urban design, architectural and historic preservation principles, and harmony with neighborhood character.
   B. For the Project Site, regardless of the ownership of the existing facilities. Identify the location of all existing antennas and facilities; and identify the location of all approved (but not installed) antennas and facilities.
   C. Emissions. Provide a report, subject to approval of the Zoning Administrator, that operation of the facilities in addition to ambient RF emission levels will not exceed adopted FCC standards with regard to human exposure in uncontrolled areas.

   *For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

9. **Screening - WTS.** To the extent necessary to ensure compliance with adopted FCC regulations regarding human exposure to RF emissions, and upon the recommendation of the Zoning Administrator, the Project Sponsor shall:
   A. Modify the placement of the facilities;
   B. Install fencing, barriers or other appropriate structures or devices to restrict access to the facilities;
   C. Install multi-lingual signage, including the RF radiation hazard warning symbol identified in ANSI C95.2 1982, to notify persons that the facility could cause exposure to RF emissions;
   D. Implement any other practice reasonably necessary to ensure that the facility is operated in compliance with adopted FCC RF emission standards.
   E. To the extent necessary to minimize visual obtrusion and clutter, installations shall conform to the following standards:

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F. Antennas and back up equipment shall be painted, fenced, landscaped or otherwise treated architecturally so as to minimize visual effects;
G. Rooftop installations shall be setback such that back up facilities are not viewed from the street;
H. Antennae attached to building facades shall be so placed, screened or otherwise treated to minimize any negative visual impact; and
I. Although co location of various companies' facilities may be desirable, a maximum number of antennas and back up facilities on the Project Site shall be established, on a case by case basis, such that "antennae farms" or similar visual intrusions for the site and area is not created.

*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

## PARKING AND TRAFFIC

10. **Managing Traffic During Construction.** The Project Sponsor and construction contractor(s) shall coordinate with the Traffic Engineering and Transit Divisions of the San Francisco Municipal Transportation Agency (SFMTA), the Police Department, the Fire Department, the Planning Department, and other construction contractor(s) for any concurrent nearby Projects to manage traffic congestion and pedestrian circulation effects during construction of the Project.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

## MONITORING - AFTER ENTITLEMENT

11. **Operation of Lighted Field.** The operation of the lighted field shall meet the following Conditions:

A. The following time limitations shall apply to the use of lights on the field:

i. Except as noted in (ii)(b) below, Monday-Thursday lights shall be dimmed no later than 8:30 pm and turned off no later than 9:00 pm.
   a. The Project Sponsor anticipates the use of the lighted field on these nights shall primarily be for practice and low attendance games (i.e., games where the anticipated attendance is below 1,000).
   b. Lights shall be used no more than 150 nights per year.
   I. Affiliates of the school may use the lights for no more than 20 of the 150 evenings.

ii. For no more than 20 evenings per year, the lights may remain on until 10:00 pm
   a. The Project Sponsor anticipates that approximately 10 of these events might be high attendance games (i.e., games where the anticipated attendance is above 1,000 to a maximum of 2,800) are Friday or Saturday evenings with visiting teams;
   b. The Project Sponsor anticipates that approximately 10 other weeknight events might be necessary due to circumstances that prevent a Friday or Saturday night event; and
   c. The Project Sponsor does not anticipate lights being used on Sundays.

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iii. The Project Sponsor shall use the lights only during the main school year (i.e., roughly between Aug. 15 and May 31 in the current schedule)

B. The Project Sponsor shall not light the field for use by groups unaffiliated with the Project Sponsor.

C. Communication with neighbors.

i. For updates and general information, the Project Sponsor shall continue to maintain a Good Neighbor Program webpage where it posts schedules and provides contact information to call or email the school.

ii. The Project Sponsor shall post on the webpage the schedule of nighttime events on the field at least a month in advance. In addition, the Project Sponsor shall post the schedule for each season by:
   a. August 1st for Fall sports;
   b. October 1st for Winter sports; and
   c. February 1st for Spring sports.

iii. The Project Sponsor shall send neighbors an annual communication reminder of how to contact the Project Sponsor about noise, parking or other concerns.

D. The Project Sponsor will distribute its J.B. MURPHY FIELD NIGHT GAME OR LARGE EVENT MANAGEMENT PLAN to home and visiting communities prior to games. This plan shall continue to include a CODE OF CONDUCT for student and spectator behavior.

E. At the end of each academic year, the Project Sponsor shall provide to the Zoning Administrator and shall post on the Good Neighbor Program webpage a summary of that year's usage of the field for practice, low attendance games, high attendance games, and any other events.

12. **Enforcement.** Violation of any of the Planning Department conditions of approval contained in this Motion or of any other provisions of Planning Code applicable to this Project shall be subject to the enforcement procedures and administrative penalties set forth under Planning Code Section 176 or Section 176.1. The Planning Department may also refer the violation complaints to other city departments and agencies for appropriate enforcement action under their jurisdiction.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

13. **Revocation due to Violation of Conditions.** Should implementation of this Project result in complaints from interested property owners, residents, or commercial lessees which are not resolved by the Project Sponsor and found to be in violation of the Planning Code and/or the specific conditions of approval for the Project as set forth in Exhibit A of this Motion, the Zoning Administrator shall refer such complaints to the Commission, after which it may hold a public hearing on the matter to consider revocation of this authorization.

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*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

14. **Implementation Costs - WTS**. The Project Sponsor, on an equitable basis with other WTS providers, shall pay the cost of preparing and adopting appropriate General Plan policies related to the placement of WTS facilities. Should future legislation be enacted to provide for cost recovery for planning, the Project Sponsor shall be bound by such legislation.

    The Project Sponsor or its successors shall be responsible for the payment of all reasonable costs associated with implementation of the conditions of approval contained in this authorization, including costs incurred by this Department, the Department of Public Health, the Department of Technology, Office of the City Attorney, or any other appropriate City Department or agency. The Planning Department shall collect such costs on behalf of the City.

    The Project Sponsor shall be responsible for the payment of all fees associated with the installation of the subject facility, which are assessed by the City pursuant to all applicable law.
    *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

15. **Implementation and Monitoring - WTS**. In the event that the Project implementation report includes a finding that RF emissions for the site exceed FCC Standards in any uncontrolled location, the Zoning Administrator may require the Applicant to immediately cease and desist operation of the facility until such time that the violation is corrected to the satisfaction of the Zoning Administrator.
    *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

16. **Project Implementation Report - WTS**. The Project Sponsor shall prepare and submit to the Zoning Administrator a Project Implementation Report. The Project Implementation Report shall:
    A. Identify the three dimensional perimeter closest to the facility at which adopted FCC standards for human exposure to RF emissions in uncontrolled areas are satisfied;
    B. Document testing that demonstrates that the facility will not cause any potential exposure to RF emissions that exceed adopted FCC emission standards for human exposure in uncontrolled areas.
    C. The Project Implementation Report shall compare test results for each test point with applicable FCC standards. Testing shall be conducted in compliance with FCC regulations governing the measurement of RF emissions and shall be conducted during normal business hours on a non-holiday weekday with the subject equipment measured while operating at maximum power.
    D. Testing, Monitoring, and Preparation. The Project Implementation Report shall be prepared by a certified professional engineer or other technical expert approved by the Department. At the sole option of the Department, the Department (or its agents) may monitor the performance of testing required for preparation of the Project Implementation Report. The cost of such monitoring shall be borne by the Project Sponsor pursuant to the condition related to the payment of the City's reasonable costs.

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E. Notification and Testing. The Project Implementation Report shall set forth the testing and measurements undertaken pursuant to Conditions 2 and 4.
F. Approval. The Zoning Administrator shall request that the Certification of Final Completion for operation of the facility not be issued by the Department of Building Inspection until such time that the Project Implementation Report is approved by the Department for compliance with these conditions.

*For information about compliance, contact the Environmental Health Section, Department of Public Health at (415) 252-3800, www.sfdph.org*

17. **Coverage and Capacity Verification.** Use is authorized as long as an independent evaluator, selected by the Planning Department, determines that the information and conclusions submitted by the wireless service provider in support of its request for conditional use are accurate. The wireless service provider shall fully cooperate with the evaluator and shall provide any and all data requested by the evaluator to allow the evaluator to verify that the maps, data, and conclusions about service coverage and capacity submitted are accurate. The wireless service provider shall bear all costs of said evaluation. The independent evaluator, upon request by the wireless service provider shall keep the submitted data confidential and shall sign a confidentiality agreement acceptable to the wireless service provider. The independent evaluator shall be a professional engineer licensed by the State of California.
*For information about compliance, contact the Case Planner, Planning Department at 415-575-9079, www.sf-planning.org .*

18. **Notification prior to Project Implementation Report - WTS.** The Project Sponsor shall undertake to inform and perform appropriate tests for residents of any dwelling units located within 25 feet of the transmitting antenna at the time of testing for the Project Implementation Report.
    A. At least twenty calendar days prior to conducting the testing required for preparation of the Project Implementation Report, the Project Sponsor shall mail notice to the Department, as well as to the resident of any legal dwelling unit within 25 feet of a transmitting antenna of the date on which testing will be conducted. The Applicant will submit a written affidavit attesting to this mail notice along with the mailing list.
    B. When requested in advance by a resident notified of testing pursuant to subsection (a), the Project Sponsor shall conduct testing of total power density of RF emissions within the residence of that resident on the date on which the testing is conducted for the Project Implementation Report.

*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

19. **Installation - WTS.** Within 10 days of the installation and operation of the facilities, the Project Sponsor shall confirm in writing to the Zoning Administrator that the facilities are being maintained and operated in compliance with applicable Building, Electrical and other Code requirements, as well as applicable FCC emissions standards.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

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20. **Periodic Safety Monitoring - WTS.** The Project Sponsor shall submit to the Zoning Administrator 10 days after installation of the facilities, and every two years thereafter, a certification attested to by a licensed engineer expert in the field of EMR/RF emissions, that the facilities are and have been operated within the then current applicable FCC standards for RF/EMF emissions.
*For information about compliance, contact the Environmental Health Section, Department of Public Health at (415) 252-3800, www.sfdph.org*

## OPERATION

21. **Sidewalk Maintenance.** The Project Sponsor shall maintain the main entrance to the building and all sidewalks abutting the subject property in a clean and sanitary condition in compliance with the Department of Public Works Streets and Sidewalk Maintenance Standards.
*For information about compliance, contact Bureau of Street Use and Mapping, Department of Public Works, 415-695-2017, http://sfdpw.org*

22. **Community Liaison.** Prior to issuance of a building permit to construct the project and implement the approved use, the Project Sponsor shall appoint a community liaison officer to deal with the issues of concern to owners and occupants of nearby properties. The Project Sponsor shall provide the Zoning Administrator and all registered neighborhood groups for the area with written notice of the name, business address, and telephone number of the community liaison. Should the contact information change, the Zoning Administrator and registered neighborhood groups shall be made aware of such change. The community liaison shall report to the Zoning Administrator what issues, if any, are of concern to the community and what issues have not been resolved by the Project Sponsor.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

23. **Lighting.** All Project lighting shall be directed onto the Project site and immediately surrounding sidewalk area only, and designed and managed so as not to be a nuisance to adjacent residents. Nighttime lighting shall be the minimum necessary to ensure safety, but shall in no case be directed so as to constitute a nuisance to any surrounding property.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

24. **Out of Service – WTS**. The Project Sponsor or Property Owner shall remove antennae and equipment that has been out of service or otherwise abandoned for a continuous period of six months.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

25. **Emissions Conditions – WTS**. It is a continuing condition of this authorization that the facilities be operated in such a manner so as not to contribute to ambient RF/EMF emissions in excess of then current FCC adopted RF/EMF emission standards; violation of this condition shall be grounds for revocation.

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*For information about compliance, contact the Environmental Health Section, Department of Public Health at (415) 252-3800, www.sfdph.org*

26. **Noise and Heat – WTS**. The WTS facility, including power source and cooling facility, shall be operated at all times within the limits of the San Francisco Noise Control Ordinance. The WTS facility, including power source and any heating/cooling facility, shall not be operated so as to cause the generation of heat that adversely affects a building occupant.
    *For information about compliance, contact the Environmental Health Section, Department of Public Health at (415) 252-3800, www.sfdph.org*

27. **Transfer of Operation – WTS**. Any carrier/provider authorized by the Zoning Administrator or by the Planning Commission to operate a specific WTS installation may assign the operation of the facility to another carrier licensed by the FCC for that radio frequency provided that such transfer is made known to the Zoning Administrator in advance of such operation, and all conditions of approval for the subject installation are carried out by the new carrier/provider.
    *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

28. **Compatibility with City Emergency Services – WTS**. The facility shall not be operated or caused to transmit on or adjacent to any radio frequencies licensed to the City for emergency telecommunication services such that the City's emergency telecommunications system experiences interference, unless prior approval for such has been granted in writing by the City.
    *For information about compliance, contact the Department of Technology, 415-581-4000, http://sfgov3.org/index.aspx?page=1421*

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CEQA Exemption Appeal

# 2018-012648

San Francisco Planning

1650 MISSION STREET, #400
SAN FRANCISCO, CA 94103
WWW.SFPLANNING.ORG

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO
2020 AUG 18 AM 8:45
BY

# BOARD OF SUPERVISORS APPEAL FEE WAIVER
## FOR NEIGHBORHOOD ORGANIZATIONS
### INFORMATIONAL AND APPLICATION PACKET

Pursuant to Planning Code Section 350(j)(3) and Ordinance No. 149-16, Section 4, the Planning Director shall consider and make determinations regarding applications for the authorization of a Board of Supervisors Appeal Fee Waiver.

For questions, call 415.558.6377, email pic@sfgov.org, or visit the Planning Information Center (PIC) at 1660 Mission Street, First Floor, San Francisco, where planners are available to assist you.

**Español:** Si desea ayuda sobre cómo llenar esta solicitud en español, por favor llame al 415.575.9010. Tenga en cuenta que el Departamento de Planificación requerirá al menos un día hábil para responder

中文：如果您希望獲得使用中文填寫這份申請表的幫助，請致電415.575.9010。請注意，規劃部門需要至少一個工作日來回應。

**Tagalog:** Kung gusto mo ng tulong sa pagkumpleto ng application na ito sa Filipino, paki tawagan ang 415.575.9120. Paki tandaan na mangangailangan ang Planning Department ng hindi kukulangin sa isang araw na pantrabaho para makasagot.

## WHAT IS AN APPLICATION FOR A BOARD OF SUPERVISORS APPEAL FEE WAIVER?

Planning Code Section 350(j)(3) and Ordinance No. 149-16, Section 4, establishes a waiver from the Board of Supervisor Appeal fees if the appeal is filed by a neighborhood organization that has been in existence for 24 months prior to the filing date of the request, is on the Planning Department's neighborhood organization notification list and can demonstrate to the Planning Director or his/her designee that the organization is substantially affected by the proposed project.

## WHO MAY APPLY FOR A DISCRETIONARY REVIEW FEE WAIVER?

Any individual or neighborhood group can file for a Board of Supervisors Appeal. Exact criteria for neighborhood group organizations in order to qualify for a fee waiver are specified below:

- the appellant is a member of the stated neighborhood organization and is authorized to file the appeal on behalf of the organization. Authorization may take the form of a letter signed by the President or other officer of the organization;
- the appellant is appealing on behalf of the organization that is registered with the Planning Department and that appears on the Planning Department's current list of neighborhood organization. To determine if the neighborhood group organization is registered with the Planning Department, visit http://sf-planning.org/neighborhood-groups-map;
- ✓ the appellant is appealing on behalf of an organization that has been in existence at least 24 months prior to the submittal of the fee waiver request. Existance may be established by evidence including that relating to the organization's activities at that time such as meeting minutes, resolutions, publications, website or roster; and
- ✓ the appellant is appealing on behalf of a neighborhood organization that is affected by the project and that is the subject of the appeal.

## HOW DO I SUBMIT THE APPLICATION?

If the requirements above are met, complete the following application, along with any necessary supporting materials, and submit it to the Planning Information Center (PIC) at 1660 Mission Street, First Floor, San Francisco, CA 94013.

A check must be made for the correct amount per the Planning Department Fee Schedule, payable to San Francisco Planning Department. Once the Department determines that the requestor is eligible for the fee waiver, the Department will mail the check back to the entity.

San Francisco Planning

# BOARD OF SUPERVISORS APPEAL FEE WAIVER
## FOR NEIGHBORHOOD ORGANIZATIONS

APPLICATION

### Appellant's Information

Name: Deborah Brown

Address: 2151 39th Ave, San Francisco CA 94116

Email Address: sisunsetneighbors@hotmail.com

Telephone: 415-566-6075

### Neighborhood Group Organization Information

Name of Organization: Saint Ignatius Neighborhood Association

Address: c/o D. Brown 2151 39th Ave, San Francisco CA 94116

Email Address: sisunsetneighbors@hotmail.com

Telephone: 415-566-6075

### Property Information

Project Address: 2001 37th Avenue, San Francisco CA

Project Application (PRJ) Record No: 2018-012648

Building Permit No: none yet

Date of Decision (if any): July 23, 2020

### Required Criteria for Granting Waiver

All must be satisfied; please attach supporting materials.

| REQUIRED CRITERIA | YES | NO |
|---|---|---|
| The appellant is a member of the stated neighborhood organization and is authorized to file the appeal on behalf of the organization. Authorization may take the form of a letter signed by the President or other officer of the organization. | ✔ | |
| The appellant is appealing on behalf of an organization that is registered with the Planning Department and that appears on the Department's current list of neighborhood organizations. | ✔ | |
| The appellant is appealing on behalf of an organization that has been in existence at least 24 months prior to the submittal of the fee waiver request. Existence may be established by evidence including that relating to the organization's activities at that time such as meeting minutes, resolutions, publications and rosters. | ✔ | |
| The appellant is appealing on behalf of a neighborhood organization that is affected by the project and that is the subject of the appeal. | ✔ | |

**For Department Use Only**

Application received by Planning Department:

By: _____ Date: _____

***Submission Checklist:***

☐ APPELLANT AUTHORIZATION ☐ CURRENT ORGANIZATION REGISTRATION ☐ MINIMUM ORGANIZATION AGE

☐ PROJECT IMPACT ON ORGANIZATION

☐ WAIVER APPROVED ☐ WAIVER DENIED

SI Neighborhood Association

The Saint Ignatius Neighborhood Association (SINA) was formed in August 2015 by neighbors in the vicinity of Saint Ignatius College Preparatory High School (SI). We are strongly opposed to the school's plan to install permanent nighttime stadium lights on their football field.

The SINA formally registered as a community organization with the SF Planning Department in October 2016.

We met with SI four times in 2015 about the lighting project and had additional email interactions with them in 2016 until SI put the project on hold in November 2016. It was not until March 2020 that we were notified by SI that the project had been reactivated and this current approval process began.

Our current membership totals 165 neighbors led by a five member Steering Committee with Deborah Brown as contact/secretary.

SINA has the support of the Sierra Club, D4Ward and the Sunset Community Garden among others, in opposition to the lighting project.

Attached is our first official communication from a member of our Steering Committee.

sisunsetneighbors@hotmail.com

Deborah Brown
Secretary, SINA

# New event: Meeting Regarding St. Ignatius proposed Football Field Lighting on Sep 15

From: Nextdoor Outer Parkside (reply@rs.email.nextdoor.com)

To: sftremor@yahoo.com

Date: Friday, August 28, 2015, 5:30 PM PDT

Nextdoor

NEW EVENT

## Meeting Regarding St. Ignatius proposed Football Field Lighting

### Details

Tue, Sep 15, 7:00 PM

St. Ignatius College Preparatory
St. Ignatius College Preparatory, 37th Avenue, San Francisco, CA, United States

In the Rectory Building. Come learn more about the proposed stadium light (90' lights on new cell-tower poles, possibly) and the impact of night-time football games on ... Read more

Posted by Nina Manzo from Outer Parkside
Just now

View details and respond

### Map

# Save The Date - Meeting with S.I.

sisunset neighbors <sisunsetneighbors@hotmail.com>
Thu 10/13/2016 6:07 PM

**To:** Seiko Grant <sgrant654@gmail.com>; Larry & Shirley Yee <lolune@yahoo.com>; Shirley & Yulei Shang <xuxialian@gmail.com>; Kathy Howard <kathyhoward@earthlink.net>; Tim & Allison Harrington <alistwinroses@gmail.com>; Randall Hung <randall.hung@gmail.com>; Wong Family <wongs39@sbcglobal.net>; Denise Little <florence723@yahoo.com>
**Cc:** Brendan Kenneally <kenneally.brendan@gene.com>; Isabelle Hurtubise <ihurtubise@gmail.com>; sftremor@yahoo.com <sftremor@yahoo.com>

As you know, Saint Ignatius has requested a meeting with a smaller group of neighbors to discuss their proposed night lights on the football field.

This meeting will be next **Thursday, October 20th 6:45 pm*** - please save the date.

You are included in our core/select group of neighbors.
For this meeting only, please do not invite anyone who is not on this list.
We are purposefully keeping this meeting to 10-12 neighbors for now.
*(Jack is included he just doesn't do email)*

More details and our "agenda" will follow.

Thank you Deborah & Brendan

* Mtg will be at SI -- President's Conference Room of McGucken Hall. This is the building furthest to the north on campus (nearest to Pacheco Street)

DEBORAH FISCHER-BROWN
RAYMOND BROWN
2151 39TH AVE
SAN FRANCISCO CA 94116-1651

1004
11-35/1210 CA
1310

8-13-20
DATE

PAY TO THE ORDER OF SF Planning Dep. $ 640 00/xxx

Six hundred forty dollars + no/cents DOLLARS

Photo Safe Deposit® Details on back

Harland Clarke

BANK OF AMERICA

Wealth Management Banking

ACH R/T 121000358

#2018-012648

[redacted]

| | |
|---|---|
| **From:** | BOS Legislation, (BOS) |
| **To:** | mwgraf@aol.com; sisunsetneighbors@hotmail.com; Scott Emblidge; chad.christie@ridgecommunicate.com; kstupi@siprep.org; pa@mallp.com |
| **Cc:** | Storrs, Bruce (DPW); Tse, Bernie (DPW); Rivera, Javier (DPW); Duran, Vanessa (DPW); Wong, Jason (DPW); PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Varat, Adam (CPC); Rodgers, AnMarie (CPC); Navarrete, Joy (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Omokaro, Ify (MTA); Horn, Jeffrey (CPC); Rosenberg, Julie (BOA); Sullivan, Katy (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); Wietgrefe, Wade (CPC); Lewis, Don (CPC); BOS Legislation, (BOS) |
| **Subject:** | PLANNING DEPARTMENT RESPONSE: Appeals of CEQA Exemption Determination - Proposed Project - 2001-37th Avenue - Hearing - October 6, 2020 |
| **Date:** | Monday, September 28, 2020 11:11:53 AM |
| **Attachments:** | image001.png |

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Greetings,

The Office of the Clerk of the Board has received the following response from the Planning Department, for the appeal of CEQA Exemption Determination for the proposed project at 2001 37th Avenue.

Planning Department Response - September 28, 2020

I invite you to review the entire matter on our Legislative Research Center by following the links below:

Board of Supervisors File No. 200992

Regards,

**Lisa Lew**
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org

**(VIRTUAL APPOINTMENTS)** To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.
*Due to the current COVID-19 health emergency and the Shelter in Place Order, the Office of the Clerk of the Board is working remotely while providing complete access to the legislative process and our services.*

Click here to complete a Board of Supervisors Customer Service Satisfaction form

The Legislative Research Center provides 24-hour access to Board of Supervisors legislation, and archived matters since August 1998.

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.*

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
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# CATEGORICAL EXEMPTION APPEAL

**2001 37th Avenue / Saint Ignatius Stadium Lighting Project**

**Date:** September 28, 2020

**To:** Angela Calvillo, Clerk of the Board of Supervisors

**From:** Lisa Gibson, Environmental Review Officer – lisa.gibson@sfgov.org
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**RE:** **Planning Record No. 2018.012648APL; Board of Supervisors File No. 200992**
**Appeal of Categorical Exemption for Saint Ignatius Stadium Lighting Project**

**Hearing Date:** October 6, 2020 (continued from September 22, 2020)

**Attachment:** A – Athletic Fields with Nighttime Lighting near Residential Areas

**Project Sponsors:** Ken Stupi, Saint Ignatius College Preparatory, (415) 682-5070
Chad Christie, Ridge Communications representing Verizon Wireless, (916) 396-1470

**Appellant:** Michael Graf of Michael W. Graf Law Offices, on behalf of Saint Ignatius Neighborhood Association, (510) 525-1208

## Planning Department's Recommendation

Uphold the California Environmental Quality Act (CEQA) categorical exemption determination and deny the appeal.

## Introduction

This memorandum is a response to the letter of appeal to the board of supervisors (the board) regarding the planning department's (the department) issuance of a categorical exemption under the California Environmental Quality Act (CEQA determination) for the proposed Saint Ignatius Field Lighting project.

The department, pursuant to Article 19 of the CEQA Guidelines, issued a categorical exemption for the project on June 3, 2020 finding that the proposed project is exempt from CEQA under two independent bases: as a Class 1 categorical exemption per CEQA guidelines section 15301 and Class 3 categorical exemption per CEQA guidelines section 15303.

The decision before the board is whether to uphold the department's decision that the project is exempt from environmental review under the categorical exemption for Class 1 and/or Class 3 and deny the appeal, or to overturn the department's decision that the project is exempt and return the project to the department staff for additional environmental review.

## Site Description and Existing Use

Saint Ignatius (SI) College Preparatory has been located at 2001 37th Avenue since 1969. The SI campus occupies a 495,470-square-foot parcel and is developed with approximately 290,595 square feet of secondary school facilities.

The J.B. Murphy Field athletic stadium is located at the southwest corner of the campus, with frontage on 39th Avenue and Rivera Street. The stadium consists of a football field with artificial turf and a six-lane synthetic track that surrounds the football field perimeter. There is a seating capacity of 2,008 persons, which includes a 1,234-seat home bleacher section with press box and a 774-seat visitors' section. The field is currently used Monday through Sunday on an annual basis for approximately 110 games/meets (including pre-season), up to 20 playoff games, 750 practices and 50 events for outside not-for-profit groups. Practices take place from 6:00 am to 7:45 am and from 3:30 pm to dusk.

The attendance for football games at the stadium typically range between 500 to 1,500 spectators. For one to three times each year, attendance for football games approach 1,500 spectators. The remaining games at the stadium typically draw fewer than 1,000 spectators: soccer games range between 50 to 200; lacrosse games ranges between 100 to 250; and track meets range between 100 to 400.

For approximately 40 to 50 evenings a year, the school uses temporary (portable) field lights at the stadium until 7:30 pm to 8:00 pm.

The existing stadium sound system is comprised of an amplified blowhorn speaker type, which shares a single amplifier that controls the volume for all speakers.

The school campus also includes a practice field (known as the "upper practice field") that fronts on 37th Avenue. The upper practice field contains four 40-foot-tall light poles and the half-sized field is used until 7:30 pm on the weekdays during the school year.

The predominant use in the immediate area consists of two-story, single-family residences.

## Project Description

The proposed project involves the installation of four 90-foot-tall light poles at SI's J.B. Murphy Field athletic stadium to support evening use at the stadium. In addition, Verizon Wireless proposes to place nine panel antennas, three integrated radio antenna units, six remote radio units, and two surge suppressors on the proposed northwest light pole. The antennas and related equipment installed on the light pole would be painted to match

the proposed light pole. Verizon Wireless would also house ancillary equipment within a 12-foot by 28-foot fenced enclosure area located on the ground, immediately adjacent to the proposed northwest light pole. Installation of each pole would require approximately 30 feet of excavation below ground surface, resulting in a total of 60 cubic yards of soil disturbance. The project would add small-scale safety lighting to the existing bleachers and sidewalk surrounding the field. The proposed project does not involve the replacement of the existing stadium sound system.[1]

The proposed evening lighting would allow for additional weekday and weekend evening use of the stadium field for practice, games, and events. The lights would be used up to 150 evenings per year. The use of the lighted field would primarily be for practice and low attendance games (i.e., games where the anticipated attendance is below 1,000). Affiliates of the school would use the lights for up to 20 of the 150 evenings. With the exceptions noted below, on Monday through Friday during the school year, the lights would be dimmed no later than 8:30 pm and turned off no later than 9:00 pm.

For up to 20 evenings per year (out of the 150), the lights would remain on until 10:00 pm. Approximately 10 of these events would be for high attendance games (i.e., games where the anticipated attendance is above 1,000 to a maximum of 2,800) on Friday or Saturday evenings. The project sponsor anticipates that approximately 10 other weekday evening events would be necessary due to circumstances that prevent a Friday or Saturday evening event; the project sponsor does not anticipate lights being used on Sundays. The project sponsor would use the lights only during the school year (i.e., roughly between August 15 and May 31). The lights would not be used for groups unaffiliated with the school.

The proposed permanent evening lighting at the stadium would shift the timing of field use from early mornings on weekdays to early evenings on weekdays.[2] In addition, approximately 5 Saturday afternoon football games would be move to Friday evenings. Below is a table that shows the existing and proposed use of the stadium.

Table 1: J.B. Murphy Field Use

| | Existing | Proposed | Change |
|---|---|---|---|
| Athletic Teams | 79 | 79 | 0 |
| Total Annual Games/Meets | 110 | 110 | 0 |
| Team Practices (approximate) | 750 | 750 | 0 |
| Saturday Daytime Football Games | 15 | 5 | -10 |
| Friday Afternoon Football Games (Junior Varsity) | 0 | 5 | 5 |
| Friday Evening Football Games (Varsity) | 0 | 5 | 5 |

[1] The June 3, 2020 CEQA determination incorrectly stated that the existing sound system would be replaced. Replacement of the existing sound system is not part of the project.
[2] With implementation of the project, the school would eliminate early morning practices.

## Background

On September 14, 2018, Saint Ignatius College Preparatory (hereinafter project sponsor) filed an application with the planning department (hereinafter department) for CEQA determination for the project described above.

On June 3, 2020, the department determined that the project was categorically exempt under two independent classes, CEQA Guidelines section 15301 (Class 1: existing facilities) and section 15303 (Class 3: new construction or conversion of small structures), and that no further environmental review was required.

On July 23, 2020, the planning commission approved the proposed project by granting a conditional use authorization. The planning commission required several conditions of approval. These conditions of approval have been included in the above project description.

On August 24, 2020, Michael Graf of Michael W. Graf Law Offices, on behalf of Saint Ignatius Neighborhood Association (hereinafter "appellant"), filed an appeal of the CEQA determination.

On September 17, 2020, the appellant filed six supplemental appeal letters.

## CEQA Guidelines

### Categorical Exemptions

CEQA Guidelines sections 15301 through 15333 list classes of projects that have been determined not to have a significant effect on the environment and are exempt from further environmental review.

CEQA Guidelines section 15301, or Class 1, consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination.

CEQA Guidelines section 15303, or Class 3, consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel.

In determining the significance of environmental effects caused by a project, CEQA Guidelines section 15064(f) states that the decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency. CEQA Guidelines section 15064(f)(5) offers the following guidance: "Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumption predicated upon facts, and expert opinion supported by facts."

## Planning Department Responses

The concerns raised in the appeal letter and supplemental letters are addressed in the responses below.

Response 1: The proposed project meets the definition of Class 1 and Class 3 exemptions.

The proposed project would add permanent evening lighting to an existing athletic stadium at a private secondary school. In addition, Verizon Wireless would install nine antennas and related equipment on the proposed northwest light pole with an approximately 336-square-foot fenced enclosure on the ground to hold ancillary equipment.

As stated above, CEQA Guidelines section 15301, or Class 1, consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. The types of "existing facilities" itemized in section 15301 are not intended to be all-inclusive of the types of projects which might fall within Class 1. This class, as a whole, includes a wide range of activities concerning existing structures and facilities. The key consideration is whether the project involves negligible or no expansion of an existing use.

The proposed project does not entail the construction of a new stadium or the expansion of the existing playing surface. The project would not expand the existing bleachers or increase the stadium's capacity. The proposed lights would primarily shift the school's existing use of the field to later times in the day and/or days of the week. The school would not be adding new athletic teams and would not rent the facility out to non-affiliated teams during evening hours. The addition of fixed, permanent lights would shift the times the school's existing programs currently use the stadium. For approximately 40 to 50 evenings a year, the school uses temporary (portable) field lights at the existing stadium. The proposed installation of permanent evening lights would support evening use at the stadium for up to 150 evenings a year. As shown above in table 1, the project would shift the timing of field use, from early mornings on weekdays to early evenings on weekdays, and would move approximately 5 Saturday afternoon football games to Friday evenings. With implementation of the project, evening games and practices are not intended to intensify the use of the stadium and the school does not anticipate an overall increase in attendance at these events.[3] Therefore, the proposed alteration to the existing facility would fit within the Class 1 exemption.

CEQA Guidelines section 15303, or Class 3, consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. This class, as a whole, includes a wide range of activities concerning new, small facilities or structures. The proposed installation of four lights poles, safety lighting, and a wireless telecommunications services facility, would all fit within the Class 3 exemption.

[3] The attendance for football games typically range between 500 to 1,500 spectators. For one to three times each year, attendance approaches 1,500. The remaining games typically draw fewer than 1,000 spectators: soccer games range between 50 to 200; lacrosse games range between 100 to 250; and track meets range between 100 to 400.

When a lead agency determines that a project fits within a class of exemption, that determination will be upheld if it is supported by substantial evidence. CEQA Guidelines define substantial evidence as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." As presented above, the department's determination is supported by substantial evidence; the appellant has not demonstrated otherwise.

Response 2: None of the exceptions for categorical exemptions apply to the proposed project.

CEQA Guidelines section 15300.2 identifies exceptions to the applicability of categorical exemptions. When any of the exceptions apply, a project that otherwise fits within a categorical exemption must undergo a higher level of environmental review. As outlined below, none of the exceptions to the categorical exemptions apply to the proposed project.

*Location*
Certain classes of exemptions, including a Class 3, may not be applied "where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies." The project site does not contain an environmental resource of hazardous or critical concern.

*Cumulative Impacts*
An exemption may not be applied "when the cumulative impact of successive projects of the same type in the same place, over time is significant." This exception applies when a project, in combination with "closely related past, present and reasonably foreseeable probable future projects" in the same place over time, could create significant environmental impacts. The proposed project does not present the possibility of cumulative impacts. See Response 3 below for more details.

*Significant Effect Due to Unusual Circumstances*
Pursuant to CEQA, the department applies a two-part analysis to determine whether there is a reasonable possibility of having a significant effect on the environment due to unusual circumstances. The following describes the two-parts, or questions, and their applicability to the project.

Part 1 Question: Do unusual circumstances exist?
Part 1 Answer: There are no unusual circumstances surrounding the project.

The lead agency must determine if unusual circumstances are present. If a lead agency determines that a project does not present unusual circumstances, that determination will be upheld if it is supported by substantial evidence, as defined above.

The circumstances surrounding the project and the project site are not unusual nor are the project elements, as substantiated by several other similar facilities near residential areas[4] in San Francisco. As shown in Attachment A:

[4] Residential neighborhoods exist almost everywhere in San Francisco, regardless of the predominate zoning (e.g., RH-1 vs. UMU). Thus, the distinction the appellant attempts to make about locating this project in a residential neighborhood is moot.

Athletic Fields with Nighttime Lighting near Residential Areas, none of the following are unusual circumstances in San Francisco:[5]

- Evening lighting for athletic activities and events, including near residential areas.
- Noise generated from athletic events, including near residential areas.
- Limited parking supply or blocked driveways.
- Evening traffic.

Similarly, the proposed wireless telecommunications services facility does not present unusual circumstances where antennas and related equipment are located through-out San Francisco on buildings, light poles, and utility poles in and near residential areas.

The alleged issues raised by the appellant do not rise to the level of "unusual circumstances," as similar conditions are encountered at other athletic fields in San Francisco. Further, some of the issues that the appellant raises are conditions that currently occur at the project site for the approximately 40 to 50 evenings the school uses temporary (portable) field lights at the stadium.

For the above reasons, the department's determination that unusual circumstances are not present is supported by substantial evidence; the appellant has not demonstrated otherwise.

Part 2 Question: Would the project result in significant effects due to unusual circumstances?
Part 2 Answer: This question is not applicable, given that no unusual circumstances are present.

If the lead agency determines that a project presents unusual circumstances, then the lead agency must determine if a fair argument has been made supported by substantial evidence in the record that the project may result in significant effects.

As stated above, there are no unusual circumstances surrounding the project, so the answer to this question is moot.

For informational purposes, however, even if unusual circumstances were present, the proposed project would not result in a significant effect on the environment. This includes effects addressed in the exceptions to a categorical exemption discussed in this response, as well as the topics discussed in Responses 4 through 10, below.

*Scenic Highways*
Categorical exemptions may not be applied to projects that "may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway." The project site is not located near a designated state scenic highway.

*Hazardous Waste*
A project that is located on a site that is listed as a hazardous waste site pursuant to Section 65962.5 of the

[5] This document is attached to this memo.

California Government Code may not be categorically exempt. The project site is not listed as a hazardous waste site by the state.

*Historical Resources*
A categorical exemption cannot be applied to a project that "may cause a substantial adverse change in the significance of a historical resource." No known historical resources are present at or neighboring the project site. The installation of four light poles and the wireless telecommunications services facility would not cause a substantial adverse change in the significance of a historical resource.

*Conclusion regarding Exceptions to Categorical Exemption*
Considering the above, the proposed project fits within the Class 1 and 3 categorical exemptions and none of the exceptions are triggered. As such, the project is not required to undergo further environmental review. Moreover, since the proposed project qualifies for an exemption, mitigation measures cannot be applied to the project. The appellant has not demonstrated that the department's CEQA determination for the proposed project is not supported by substantial evidence in the record.

## Response 3: The proposed project would not result in a significant cumulative impact.

CEQA Guidelines section 15355 defines cumulative impacts as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. These effects may be from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable projects. The department generally considers reasonably foreseeable projects as those projects actively undergoing environmental review, recently completed environmental review, or the department anticipates undertaking environmental review soon because they have received sufficient project definition.[6]

The appellant incorrectly alleges that there are three projects that would combine with the proposed project, resulting in cumulative impacts. The appellant has also not presented substantial evidence as to how significant cumulative impacts would occur.

The first project that the appellant lists is the expansion of the lights used at SI's upper practice field from 7:30 pm to 9:00 on practice evenings and to 10 pm on Friday game evenings. The planning department has not received a proposal from the school of this change. Therefore, any changes to the lighting schedule at the upper practice fields would not be considered reasonably foreseeable. Even if such a permit were filed, there would be no cumulative impacts because the increase of evening hours at the upper practice field would not substantially intensify the use of the half-sized sports field or would expect to have an adverse effect on the surrounding area.[7]

The second project that the appellant suggests will lead to cumulative impacts is the installation of safety lights at the stadium bleachers and sidewalk. However, these lights are part of the proposed project and were therefore

[6] San Francisco Planning Department, "Transportation Impact Analysis Guidelines for Environmental Review," updated October 2019, p. 22.
[7] The nearest residential property to the upper practice field is approximately 230 feet away.

considered in the CEQA determination. The proposed installation of safety lighting is required because the lighting from the proposed 90-foot-tall lights poles would be directed towards the field in such a way that it would not spill over to provide adequate safety lighting for areas immediately surrounding the field. Since the proposed safety lighting is part of the proposed project, it would not be considered a cumulative project.

The third project cited by the appellant is the construction of a new theater/performing arts center and outdoor swimming pool, which is part of the school's Ten Year Institutional Master Plan.[8] The school prepared the master plan for informational purposes only to facilitate its efforts to maintain and renovate the existing campus buildings, add new buildings to support their educational vision, and provide information to the public.[9] The planning department has not received a project application or any other information from the school indicating that these facilities would be reasonable foreseeable under CEQA. The construction of these facilities is speculative as the project sponsor has indicated in their appeal response that the "school's conceptual plans for future expansion are, at this time, purely aspirational" and "no funds exist." The master plan also lists these facilities as "conceptual." Further, the appellant hasn't provided substantial evidence that a significant cumulative impact would occur with the proposed project even if this third project was reasonably foreseeable.

As discussed above, the proposed project does not have potential to combine with other projects to create a significant cumulative impact related to lighting or other environmental topics. Therefore, the cumulative impacts exception, per CEQA Guidelines section 15300.2, is not applicable to the proposed project as there are no past, present or reasonably foreseeable future projects that would have the potential to have significant cumulative impacts with the proposed project.

### Response 4: For informational purposes, the proposed project would not result in a significant noise impact.

CEQA does not require that the department consider whether significant impacts associated with noise in general would occur, as noise by itself is not an exception to the use of a categorical exemption. Thus, the following discussion of the project's noise impacts is provided for informational purposes and may be more appropriately considered by the board in its deliberation of the conditional use authorization appeal for the proposed project.

The nearest sensitive receptors to the existing stadium are residents living along the west side of 39th Avenue and the south side of Rivera Street (approximately 100 to 180 feet away, respectively).[10] Under CEQA, the impacts of a proposed project must be evaluated by comparing expected environmental conditions after project implementation to existing conditions referred to as the baseline. The baseline for noise includes noise that is generated from the existing stadium, which includes practices and game day events. The baseline also includes the approximately 40 to 50 evenings where the school uses temporary (portable) field lights at the stadium. The use of these portable lights requires diesel-powered generators.

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[8] Saint Ignatius College Preparatory' s Ten Year Institutional Master Plan can be located here: https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=44983aa73874e902da916ddc551b2fcd11620f616550cc8d836a40e7db038f16&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0

[9] Secondary schools are not subject to Planning Code Section 304.5, Institutional Master Plans.

[10] Ambient noise levels in the project vicinity are typical of noise levels in greater San Francisco, which are dominated by vehicular traffic, including trucks, cars, Muni buses and emergency vehicles.

The proposed lighting would allow for weekday and weekend evening use of the existing field for practice and games. The lights would be used for up to 150 evenings per year. Most of these evenings would be for practice and low attendance games. On Monday through Friday, the lights would be dimmed no later than 8:30 pm and turned off no later than 9:00 pm. For no more than 20 evenings per year, the lights would remain on until 10:00 pm. Approximately 10 of these events would be for high attendance games (i.e., games where the anticipated attendance is above 1,000 to a maximum of 2,800). All practices, low attendance games, and high attendance games already occur at the project site. Additional users are not expected, as some of the existing programs would be moved from daytime to evening use. Games with the largest attendance that currently occur on Saturday afternoons would be moved to Friday or Saturday evenings. The school does not expect the project to create an overall increase in event attendance.[11,12] The school has one very large attendance game each year, the Bruce Mahoney game with Sacred Heart. This event is held at Kezar Stadium and would continue to do so after project implementation.

The project would not result in net new noise as the project would shift the timing of field use. There would not be an increase in noise by shifting practices from early morning to early evening. Additionally, there would not be an increase in crowd noise or public address announcers from moving approximately five football games from Saturday afternoons to Friday evenings. While the new hours of evening use would be considered at a more noise-sensitive time as more people in the surrounding area may be sleeping or approaching sleep periods, the noise generated for practices would not be considered substantial and the number of evening events would be limited to 20 and would be over before the lights turn off at 10 pm.

Similar to existing conditions, noise generated from the proposed evening use of the stadium would be largely from unamplified voices. Noise from unamplified voices is not typically a significant impact unless the noise could interfere with activities such as sleep. Noise associated with the stadium would primarily occur during the daytime and early evening, and would unlikely result in sleep disturbance. Noise that does not interfere with sleep disturbance or result in physiological effects may be an annoyance to nearby sensitive receptors, but is not unusual in the urban context of San Francisco, and is not considered a significant impact under CEQA.

Game events would be louder than practice events, but similar to existing conditions, as high-attendance game events would be infrequent with short-duration and would be considered temporary noise impacts. The noise generated from the evening use of the athletic stadium would not be considered to result in sleep disturbance. Rather, it would be perceived as an annoyance to some and may require some households to close windows.

Additionally, a potentially significant increase in the ambient noise level due to traffic resulting from the proposed project as the project is not expected to increase existing traffic levels in the surrounding area due to the shift in traffic levels to other times of the day.

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[11] The project does not propose changes to the existing stadium bleachers or increases to stadium capacity.

[12] Event noise would not be expected to exceed 10 decibel (dBA) above existing ambient noise levels. A 10 decibel increase in ambient noise levels represents a perceived doubling of loudness which would be considered substantial.

The proposed project does not involve the replacement of the existing sound system.[13]

With installation of permanent evening lights, the school's use of the athletic stadium would change in times of day and/or days of week and would occur during more noise-sensitive times. However, as discussed above, this change would not result in a substantial permanent increase in ambient noise levels and the net-new noise would be comparable to baseline conditions

Response 5: For informational purposes, the proposed project would not result in a significant parking impact.

CEQA does not require that the department consider whether significant impacts associated with parking in general would occur, as parking by itself is not an exception to the use of a categorical exemption, nor is it considered a significant impact on the environment. Thus, the following analysis of parking impacts is provided for informational purposes only and may be more appropriately considered by the board in its deliberation of the conditional use authorization appeal for the proposed project.

Approximately 40 to 50 evenings a year, the school uses temporary (portable) field lights at the existing stadium. The appellant claims that the proposed project would result in a significant parking impact because in the past when the school used temporary lights for evening games, residents found their driveways blocked and there was no available on-street parking in the immediate area.

In 2009, the California Secretary of Natural Resources Agency removed inadequate parking capacity from the checklist form set forth in Appendix G of the CEQA Guidelines. While CEQA included inadequate parking capacity as a question to consider up until 2009, the department consistently found that, in the transit-rich urban context of San Francisco, parking loss or deficit in and of itself does not result in direct physical changes to the environment. In other words, the social inconvenience of a person searching in their vehicle for an available parking space is not an environmental impact under the purview of CEQA; instead, the secondary effect of this search in relation to other topics could be an environmental impact.[14] In 2013, Governor Brown signed California Senate Bill 743, which affected parking analysis through legislation. Specifically, the senate bill stated that impacts to parking shall not be considered a significant impact on the environment.

Consistent with this history, the planning department's 2019 transportation impact guidelines do not include parking, by itself, as a significant impact. Instead, the department assesses whether a parking deficit could occur

[13] The June 3, 2020 CEQA determination incorrectly stated that the existing sound system would be replaced. Replacement of the existing sound system is not part of the project.

[14] For more information on the history of vehicular parking analysis in San Francisco, refer to San Francisco Planning Department, "California Environmental Quality Act: Vehicle Miles Traveled, Parking, For-Hire Vehicles, and Alternatives", February 23, 2017. The memo can be located at: https://default.sfplanning.org/publications_reports/TIA_Guidelines_Summary_of_Changes_Memo.pdf

using vehicle miles traveled (VMT) screening criteria.[15] If a project meets the screening criteria, then a substantial parking deficit would not occur, and the project would not require parking analysis. Almost all projects located within San Francisco are located within transit priority areas and would not require parking analysis under CEQA.

As shown below in Table 2, the proposed project is within the VMT map-based screening area. The proposed project is located in transportation analysis zone (TAZ) 496. The existing and future VMT per capita for a school use in TAZ 496 are 14.3 and 12.8, respectively, which are both below the screening criteria.[16] TAZ 496 exhibits VMT that is 11.7 percent below the respective existing and cumulative (2040) screening thresholds (Bay Area Regional Average Minus 15 percent) for the proposed use. Thus, no significant parking impacts would occur.

Table 2: Secondary Parking & Vehicle Miles Traveled Analysis

| Land Use | Existing | | | | Cumulative 2040 | | | |
|---|---|---|---|---|---|---|---|---|
| | Bay Area Regional Average | Bay Area Regional Average minus 15% (threshold) | TAZ 496 | Percent +/- Threshold | Bay Area Regional Average | Bay Area Regional Average minus 15% (threshold) | TAZ 496 | Percent +/- Threshold |
| School Use | 17.2 | 16.2 | 14.3 | -11.7 | 16.1 | 14.5 | 12.8 | -11.7 |

## Response 6: Automobile delay (traffic) cannot be considered a significant effect on the environment.

The appellant alleges that the proposed project's evening events would result in high traffic volumes but does not provide substantial evidence to support this claim. With the installation of permanent evening lights, the school's Saturday football games would be moved to Friday evening. The proposed project would not expand the existing bleachers or increase the stadium capacity, and the project sponsor does not anticipate an overall increase in event attendance as compared to existing events that are held at the stadium, which includes the approximately 40 to 50 evenings a year that the school uses temporary (portable) field lights. Furthermore, and as discussed below, through planning commission resolution and subsequent state legislation, automobile delay is no longer a CEQA criteria.

In March 2016, the San Francisco Planning Commission unanimously passed a resolution that directed the department to remove automobile delay as a factor in determining significant impacts pursuant to CEQA and replace it with vehicle miles traveled (VMT) criteria.[17] Pursuant to Public Resources Code section 21099(b)(1),

[15] The planning department's 2019 transportation impact analysis guidelines for environmental review can be located at: https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines.

[16] The Office of Planning and Research has not provided proposed screening criteria or thresholds of significance for other types of land uses, other than those that meet the definition of a small project. Other land use projects means a land use other than residential, retail, and office. Child care facilities, K-12 schools, post-secondary institutional (non-student housing), medical, and production, distribution, and repair (PDR) land uses should be treated as office for screening and analysis.

[17] On March 3, 2016, the Planning Commission adopted resolution 19579, which found that automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall no longer be considered a significant impact on the environment pursuant to CEQA. The resolution

automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant environmental impact under CEQA (effective December 2018).

Consistent with this change, the planning department's 2019 transportation impact guidelines include VMT map-based and other screening criteria, analysis, and methodology. The 2019 guidelines state that if a project meets the screening criteria, then no significant VMT impacts would occur (which is the case for most projects in the city). As shown above in Table 1, the proposed project meets the VMT screening criteria. Therefore, a VMT analysis is not required.

### Response 7: For informational purposes, the proposed project would not result in a significant public safety impact.

CEQA does not require that the department consider whether significant impacts associated with public safety in general would occur, as public safety by itself is not an exception to the use of a categorical exemption. Thus, the following discussion of public safety is provided for informational purposes and may be more appropriately considered by the board in its deliberation of the conditional use authorization appeal for the proposed project.

The appellant states that the school has used temporary lighting in the past for night games which resulted in public urination, blocked driveways, and broken bottles. These types of issues are considered social impacts to which CEQA does not require analysis. CEQA serves to address physical changes in the environment. The project would not create a public safety impact related to hazards and hazardous materials, nor would the project create potentially hazardous conditions for people walking, bicycling, driving, or public transit operations. The appellant does not provide any substantial evidence to support their claim of a significant public safety impact.

### Response 8: For informational purposes, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings.

CEQA does not require that the department consider whether significant impacts associated with aesthetics in general would occur, as aesthetics by itself is not an exception to the use of a categorical exemption. Thus, the following discussion of aesthetics is provided for informational purposes and may be more appropriately considered by the board in its deliberation of the conditional use authorization appeal for the proposed project.

The proposed installation of four 90-foot-tall light poles safety lighting, and the proposed wireless telecommunications services facility, would change the existing character of the project site. However, this change would not degrade the visual character or quality of the project site and its surroundings. The light poles would add a new vertical element to the project site, and these features would be consistent with the primary purpose of the project site as a school athletic stadium. The size of the proposed antennas and related equipment would be minimal in size and would be painted to match the proposed light poles. The light poles and the wireless facility would not substantially diminish the visual quality of the stadium. The proposed fenced ground enclosure that

directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA for all guidelines, criteria, and list of exemptions, and to update the Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change.

would house Verizon's ancillary equipment would be minimally visible from the public right-of-way as the stadium is surrounded by a steel fence and landscaping. The proposed ground enclosure would be viewed in the context of the athletic stadium, which includes bleachers and other small structures that provide storage of athletic equipment, and the incremental visual effect would be minimal. The addition of small-scale safety lighting at the bleachers and sidewalk surrounding the field would also have a minimal visual effect as similar elements exist at and near the project site.

The four light poles would be installed in locations on the perimeter of the playfield in order to light the field most effectively. The proposed light poles would be visible from surrounding streets, but the poles would not be grouped such that they would be placed in proximity to one another. As such, the proposed light poles would not block views from nearby streets. Given the dense urban setting of the proposed project, its continued use as an athletic stadium, and the limited introduction of project elements into views of the site, the project would not result in a substantial adverse effect to the visual character or quality of the project site.

The proposed stadium lighting, including the proposed nine antennas and related equipment to be installed on the northwest pole, would modestly interrupt or alter some existing private views currently available to nearby residences in the vicinity of the stadium. The residences located immediately across from the stadium along Rivera Street and 39th Avenue would be most affected by the new light standards and evening lighting that would be used to illuminate the playfield in the evening. Changes to private views would differ based on proximity to the project site, quality of the view currently experienced, and relative sensitivity of the viewer. Such views could be perceived as undesirable consequence for affected residents who are used to the exiting visual conditions. However, CEQA does not consider impacts to private views to be part of the environment. Thus, the proposed project's impact on private views would not be considered a potentially significant environmental impact, even if an unusual circumstance were present.

Response 9: For informational purposes, the proposed project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area or that would substantially affect other people or properties.

CEQA does not require that the department consider whether significant impacts associated with aesthetics in general would occur, as aesthetics by itself is not an exception to the use of a categorical exemption. Thus, the following discussion of aesthetics is provided for informational purposes and may be more appropriately considered by the board in its deliberation of the conditional use authorization appeal for the proposed project.

Existing sources of evening light in the area surrounding the existing stadium include street lights on adjacent streets as well as existing light standards at the school's upper practice field. Approximately 40 to 50 evenings a year, the school uses temporary (portable) field lights at the existing stadium. The temporary lights that are not equipped with spill and glare shielding to minimize light spill.[18] Other sources of light include vehicles traveling along roadways and light emanating from nearby residences and other buildings.

[18] Here is a link to the specifications of the portable lights that SI uses: https://www.unitedrentals.com/marketplace/equipment/light-towers-generators/towable-light-towers/light-tower-6kw-generator#/

The proposed project includes installation of permanent field lighting that would consist of four 90-foot-tall light poles composed of galvanized steel. Two light poles would be installed at the west side of the stadium and two at the east side. The proposed lighting design uses a light structure system equipped with total light control for LED fixtures designed and manufactured by Musco Lighting Systems, which requires 36 1,500-watt LED fixtures to achieve the recommended 50 foot-candle (fc) average.[19] The total light control for LED fixtures are designed to concentrate the light on the field area with minimal light emitted outside the targeted areas. The lighting system is capable of being switched to a "dimmed" setting. This feature would allow the lights to be turned down during events not requiring full lighting. The proposed lighting system, which is specifically designed for sports fields, would be equipped with spill and glare shielding. The light system would be designed to focus the light on the field evenly while minimizing the spread of light upward and beyond the project site boundaries. Due to the limited amount of spill from the 90-foot-tall light poles, the project would add safety lighting to the existing bleachers and sidewalk surrounding the field.

The playing field would be illuminated to a guaranteed average of 50 fc.[20] The light spillover on the visiting bleachers, which are located on the west side of the field closest to the nearest residences along 39th Avenue would have an illuminated average of 25 fc. The track that surrounds the playing field would be illuminated with an average of 21 fc. Light spilling over the project boundary from the light poles would be greatly reduced beyond the stadium field. The average spillover immediately adjacent to the light poles (outside of the stadium) would be approximately 14 fc. The spillover to the nearest residential property lines would diminish farther. The maximum illuminance at the front residential property line along 39th Avenue would range from 0.0 to 0.7 fc and would range from 0.0 to 0.1 fc along Rivera Street. In addition, glare impacts on adjacent residents would be also be considered limited. The glare from the proposed lighting would be approximately 5,000 candela at the residents adjacent to the stadium, which is not substantial.[21] Visual simulations prepared for the proposed project also indicate that the light and glare would not be expected to substantially affect the closest residences.[22]

Factors that affect the impact of lighting include the brightness of surrounding lighting, such as residential lights and moonlight, and the "bounce" of the field lights off surrounding structures, the ground, and particles of water in the air (i.e., fog). Thus, the impact of additional artificial lighting on light spillover can depend on such things as the reflectivity and wetness of the synthetic turf, fog conditions, and the phase of the moon. Although lighting proposed by the project would appear brighter compared to existing conditions, the lighting levels for locations off the field are not sufficient to adversely and substantially affect the surrounding neighborhood given that the

[19] A foot-candle is defined as the illuminance on a one square foot surface from a uniform source of light. The closer to a light source the illuminated area is, the higher the Illuminance value. Horizontal illuminance describes the amount of light landing on a horizontal surface, such a field or sidewalk. Vertical illuminance describes the illuminance landing on a vertical surface, such as a wall.

[20] Musco Lighting, Photometrics, December 20, 2019. This document is available for review at: http://citypln-m-extnl.sfgov.org/External/link.ashx?Action=Download&ObjectVersion=-1&vault={A4A7DACD-B0DC-4322-BD29-F6F07103C6E0}&objectGUID={07DF29DA-4657-4909-A2D0-547B1DF761E5}&fileGUID={DE57C84A-ACDC-46E6-B5CF-F891B9C81A4F}

[21] For informational purposes, glare between 25,000 to 75,000 candela is equivalent to the high beam headlights on a car and500 or fewer candela is equivalent to a 100-watt incandescent light bulb.

[22] Verde Design, *3D Views for Saint Ignatius High School Field Lighting Design*, January 7, 2020. https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=0837d936c3fec632ad24ad747e8c78f0f75217015979fdc11a1d0de9211c8549&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0

project site is in an urban neighborhood with existing street lighting and other light sources. In addition, lighting would be directed onto the field surface and not the windows of adjacent properties. Furthermore, while the lights would be used for up to 150 evenings per year, the lights would only remain on until 10 pm for up to 20 times a year.[23] These later evening events would be infrequent with short-duration, and the light generated from the evening use of the athletic stadium would be perceived as an annoyance to some and may encourage some households to close shades or blinds. The light would not be unusual in the urban context of San Francisco. Therefore, the effects of evening lighting would not substantially impact people or properties in the project vicinity.

Please see the project sponsor's response for further discussion. Also, please see Response 8 for the consideration of visual character.

Response 10: For informational purposes, the proposed project would not result in a significant impact to biological resources.

CEQA does not require that the department consider whether significant impacts associated with biological resources in general would occur, as biological resources by itself is not an exception to the use of a categorical exemption.[24] Thus, the following discussion of biological resources is provided for informational purposes and may be more appropriately considered by the board in its deliberation of the conditional use authorization appeal for the proposed project.

The existing stadium is comprised of a synthetic turf playing field that is surrounded by a track and bleachers. The project site has been heavily disturbed and does not provide potential habitat for special-status species. The project involves the installation of four 90-foot-tall light poles and safety lighting. The project does not involve tree or vegetation removal. Since the project does not propose the removal of habitat, the project would not have a substantial adverse effect on special-status species at the project site. Additionally, the installation of the four 90-foot-tall light standards would not result in a barrier to wildlife movement and is not expected to result in substantial impacts on any migratory wildlife corridor.

With the installation of permanent light poles, the stadium would be lit for up to 150 evenings a year. For approximately 40 to 50 evenings a year, the school uses temporary (portable) field lights at the existing stadium. Other existing sources of light, include four light standards that illuminate the school's upper practice field nearby street lighting and other light sources, such as from traffic and buildings. The project site is located immediately adjacent to the West Sunset soccer fields which includes approximately 6 acres of natural grass turf that could be potential habitat for special-status species.[25] The proposed lighting system would be equipped with spill and glare shielding and would be designed to minimize the spread of light beyond the project site boundaries. According to Musco's photometrics analysis, which included 9 location points at West Sunset soccer fields, the project would not result in horizontal illuminance on the immediately adjacent grass field and would have a vertical illuminance

[23] On Monday through Thursday, the lights would be dimmed no later than 8:30 pm and turned off no later than 9:00 pm.
[24] Response 2, above, addresses the location exception that can relate to biological resources.
[25] The West Sunset Playground includes tennis courts that have nighttime lighting until 10 pm.

in range of 0 to 0.1 foot-candles.[26,27] Therefore, the proposed lights would not considerably spill on the West Sunset soccer fields. The proposed stadium lights would be used for up to 150 evenings per year, and for most evenings, the lights would be dimmed no later than 8:30 pm and turned off no later than 9:00 pm. For up to 20 times a year, the lights would remain on until 10 pm. The light and glare from the proposed project would not have a substantial adverse effect on special-status species on the project site or surrounding area.

The project site is within the Pacific Flyway along with much of the greater San Francisco Bay Area, within three miles of the Pacific Ocean. While exact migratory corridors through the area are unknown and vary by species, birds typically follow coastlines, rivers, and mountain ranges in their migratory passages from wintering to breeding grounds and back again. The project site does not provide foraging habitat for migratory species, but migrating birds likely fly over the stadium. Although the project site is located within the Pacific Flyway and in close proximity to the Pacific Ocean shoreline, migratory corridors in the vicinity of the project site are unknown. It can be assumed, however, that numerous birds pass overhead or in the project vicinity during spring and fall migrations.

Birds in the project area are accustomed to varying levels of ambient noise and lighting emanating from existing human activities, which includes athletic activities at SI's stadium (including the 40 to 50 evenings of temporary stadium lighting and the diesel generators that power the portable lights) and upper practice field and the adjacent West Sunset soccer fields, and vehicular traffic along Sunset Boulevard and other nearby streets. Evening lighting could potentially deter the general use of the project site and its immediate surroundings from birds. However, the project is not anticipated to interfere substantially with bird movement given the existing conditions and the shielding of the proposed stadium lighting.

Furthermore, the project would not result in net new noise as the project would shift the timing of field use and would not expand the use. There would not be an increase in noise by shifting practices from early morning to early evening. Additionally, there would not be an increase in crowd noise or public address announcers from moving approximately five football games from Saturday afternoons to Friday evenings. The project would not result in noise impacts on biological resources.

For the above reasons, the proposed project would not result in significant impacts to biological resources.

### Response 11: The planning department appropriately reviewed the proposed project and considered all aspects of the project.

CEQA generally prohibits an agency from "chopping up" a large project into many little ones, each of which might have individually minimal environmental consequences, but collectively may have significant environmental

[26] Musco Lighting, Photometrics, December 20, 2019. This document is available for review at: http://citypln-m-extnl.sfgov.org/External/link.ashx?Action=Download&ObjectVersion=-1&vault={A4A7DACD-B0DC-4322-BD29-F6F07103C6E0}&objectGUID={07DF29DA-4657-4909-A2D0-547B1DF761E5}&fileGUID={DE57C84A-ACDC-46E6-B5CF-F891B9C81A4F}

[27] Horizontal illuminance describes the amount of light landing on a horizontal surface, such a field or sidewalk. Vertical illuminance describes the illuminance landing on a vertical surface, such as a wall

impacts. This "chopping up" of a large project is known as "piecemealing." The planning department considered all aspects of the proposed project, which includes the installation of four 90-foot-tall light poles, the installation of safety lighting at the existing bleachers and sidewalk surrounding the field, and the installation of the wireless facility. The replacement of the existing stadium sound system is not part of the project.[28] As discussed in Response 3, the CEQA determination did not include the expansion of lights at the existing upper practice field because it is not part of the project and the planning department has no information that the school is proposing this change at the upper practice field.[29] The department considered the whole of the project and did not conduct "piecemeal" environmental review. The appellant does not provide substantial evidence to support their claim.

## Conclusion

The department has determined that the proposed project is categorically exempt from environmental review under CEQA on the basis that: (1) the project independently meets the definition of two of the classes of projects that the Secretary of Resources has found do not have a significant effect on the environment, and (2) none of the exceptions specified in CEQA Guidelines section 15300.2 prohibiting the use of a categorical exemption are applicable to the project. The appellant has not demonstrated that the department's determination is not supported by substantial evidence in the record.

For the reasons stated above and in the June 3, 2020 CEQA categorical exemption determination, the CEQA determination complies with the requirements of CEQA and the project is appropriately and independently exempt from environmental review pursuant to the cited exemptions. The department therefore respectfully recommends that the board uphold the CEQA categorical exemption determination and deny the appeal of the CEQA determination.

[28] The June 3, 2020 CEQA determination incorrectly stated that the existing sound system would be replaced. Replacement of the existing sound system is not part of the project.

[29] As discussed in Response 3, the construction of a new theater/performing arts center and outdoor swimming pool is speculative at this time since there are no funds available for future expansion.

## Attachment A: Athletic Fields with Nighttime Lighting near Residential Areas

| Athletic Facility | Address | Nearest Residential Property (approximate) | Weekday Lights Off | Saturday Lights Off | Sunday Lights Off | 7 Days of the Week | Parking | Notes |
|---|---|---|---|---|---|---|---|---|
| **Proposed Conditions: Saint Ignatius J.B. Murphy Stadium** | **2001 37th Avenue** | **100 feet** | **Dimmed at 8:30 PM, off at 9 PM (except for 20 events that are permitted until 10 PM)** | **N/A** | **N/A** | **Monday to Saturday only** | **No parking at facility, limited on-street parking supply** | **The school cannot use the lights more than 150 nights per year.** |
| **Existing Conditions: Saint Ignatius "Upper Practice Field"** | **2001 37th Avenue** | **230 feet** | **7:30 PM** | **N/A** | **N/A** | **weekdays only** | **No parking at facility, limited on-street parking supply** | **1 half-sized practice field with permanent lights** |
| **Existing Conditions: Saint Ignatius "Temporary Stadium Lighting"** | **2001 37th Avenue** | **100 feet** | **7:30 to 8:00 PM** | **N/A** | **N/A** | **Monday to Friday only** | **No parking at facility, limited on-street parking supply** | **Temporary (portable) lights are used at the stadium approximately 40 to 50 nights a year during the school year.** |
| Crocker Amazon Soccer Fields and Crocker Diamonds | 799 Moscow Street | 140 feet | 10:00 PM | 10:00 PM | 8:30 PM | Yes | Two parking lots, limited on-street parking supply | 5 soccer fields and 5 baseball diamonds |
| Excelsior Athletic Field | 579 Madrid Street | 70 feet | 7:00 PM | By permit only | By permit only | Yes, but weekends by permit only | No parking at facility, limited on-street parking supply | 1 baseball diamond |
| Franklin Athletic Field | 2500 17th Street | 170 feet | 10:00 PM | 10:00 PM | 8:30 PM | Yes | Parking lot at facility, limited on-street parking supply | 1 soccer field |

| Athletic Facility | Address | Nearest Residential Property (approximate) | Weekday Lights Off | Saturday Lights Off | Sunday Lights Off | 7 Days of the Week | Parking | Notes |
|---|---|---|---|---|---|---|---|---|
| Galileo Academy of Science and Technology | North Point Street at Polk Street | 60 feet | Unknown | Unknown | Unknown | Unknown | Parking lot at facility, limited on-street parking supply | 1 football/soccer field at stadium. Lights installed on fence along North Point Street. |
| Garfield Soccer Pitch | 2965 Harrison Street | 80 feet | 9:00 PM | 6:30 PM | 5:30 PM | Yes | No parking at facility, limited on-street parking supply | Half-sized soccer field |
| Jackson Athletic Field | 17th Street and Arkansas Street | 85 feet | 10:00 PM | 6:00 PM | 6:00 PM | Yes | No parking at facility, limited on-street parking supply | 2 baseball diamonds and grassy area |
| James Rolph Mission Athletic Field | 2850 Cesar Chavez Street | 60 feet | 10:00 PM | 10:00 PM | 10:00 PM | Yes | No parking at facility, limited on-street parking supply | 2 baseball diamonds and grassy area |
| Kezar Stadium | 670 Kezar Drive | 170 feet | By permit only | By permit only | By permit only | Yes, but by permit only (10 PM off) | Parking lot at facility, limited on-street parking supply | 10,000-person capacity stadium with a soccer/football field and track |
| Kimbell Athletic Field | Geary Boulevard and Steiner Street | 75 feet | 10:00 PM | 7:30 PM | 7:30 PM | Yes | No parking at facility, limited on-street parking supply | 1 soccer field and 3 baseball diamonds |
| Lang Athletic Field | 1102 Eddy Street | 70 feet | 10:00 PM | 6:00 PM | 6:00 PM | Yes | No parking at facility, limited on-street parking supply | 2 baseball diamonds and grassy area |
| Minnie and Lovie Ward Recreation Center and Playfields | 650 Capitol Avenue | 90 feet | 10:00 PM | 7:30 PM | 6:30 PM | Yes | No parking at facility, limited on-street parking supply | 2 soccer fields, 2 diamonds, and grassy area |
| Mission Playground Soccer Field | 19th Street and Linda Street | 20 feet | 10:00 PM | 10:00 PM | 10:00 PM | Yes | No parking at facility, limited on-street parking supply | 1 half-sized soccer field |

| Athletic Facility | Address | Nearest Residential Property (approximate) | Weekday Lights Off | Saturday Lights Off | Sunday Lights Off | 7 Days of the Week | Parking | Notes |
|---|---|---|---|---|---|---|---|---|
| Moscone Athletic Fields | 1800 Chestnut Street | 130 feet | 10:00 PM | 7:30 PM | 6:30 PM | Yes | No parking at facility, limited on-street parking supply | 4 baseball diamonds and grassy area |
| Negoesco Stadium (USF) | 222 Stanyan Street | 50 feet | Unknown | Unknown | Unknown | Unknown | Parking lot at facility, limited on-street parking supply | 3,000-person capacity stadium with 1 soccer field |
| Silver Terrace Athletic Fields | 1700 Silver Terrace | 15 feet | 10:00 PM | 8:00 PM | 8:00 PM | Yes | No parking at facility, limited on-street parking supply | 1 soccer field and 2 baseball diamonds |
| South Sunset Athletic Fields | 40th Avenue and Wawona Avenue | 100 feet | 10:00 PM (Friday 8:00 PM) | 8:00 PM | 8:00 PM | Yes | No parking at facility, limited on-street parking supply | 2 baseball diamonds or 3 soccer fields |
| West Campus Green Recreation Field (SF State) | 700 Font Boulevard | 100 feet | 10:00 PM | 10:00 PM | 10:00 PM | Yes | No parking at facility, limited on-street parking supply | 2 soccer fields |
| Youngblood Coleman Soccer Field | Mendell Street at Galvez Street | 30 feet | 10:00 PM | 10:00 PM | 10:00 PM | Yes | No parking at facility, limited on-street parking supply | 1 soccer field and 1 baseball diamond |

| | |
|---|---|
| **From:** | Scott Emblidge |
| **To:** | BOS Legislation, (BOS); mwgraf@aol.com; sisunsetneighbors@hotmail.com; chad.christie@ridgecommunicate.com; kstupi@siprep.org; pa@mallp.com |
| **Cc:** | Storrs, Bruce (DPW); Tse, Bernie (DPW); Rivera, Javier (DPW); Duran, Vanessa (DPW); Wong, Jason (DPW); PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Varat, Adam (CPC); Rodgers, AnMarie (CPC); Navarrete, Joy (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Omokaro, Ify (MTA); Horn, Jeffrey (CPC); Rosenberg, Julie (BOA); Sullivan, Katy (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); Wietgrefe, Wade (CPC); Lewis, Don (CPC) |
| **Subject:** | RE: PROJECT SPONSOR RESPONSE: Appeals of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue - Hearing - September 22, 2020 |
| **Date:** | Friday, September 25, 2020 3:51:14 PM |
| **Attachments:** | image001.png<br>2020 09 25 Final SI BOS Ltr.pdf |

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All,

Attached is the response of St. Ignatius College Preparatory to the two appeals pending before the Board of Supervisors. Please let me know if you have any questions.

Scott Emblidge

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**From:** BOS Legislation, (BOS) <bos.legislation@sfgov.org>
**Sent:** Tuesday, September 22, 2020 11:57 AM
**To:** mwgraf@aol.com; sisunsetneighbors@hotmail.com; Scott Emblidge <emblidge@mosconelaw.com>; chad.christie@ridgecommunicate.com; kstupi@siprep.org; pa@mallp.com
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Esquide@sfcityatty.org>; Hillis, Rich (CPC) <rich.hillis@sfgov.org>; Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Jain, Devyani (CPC) <devyani.jain@sfgov.org>; Varat, Adam (CPC) <adam.varat@sfgov.org>; Rodgers, AnMarie (CPC) <anmarie.rodgers@sfgov.org>; Navarrete, Joy (CPC) <joy.navarrete@sfgov.org>; Teague, Corey (CPC) <corey.teague@sfgov.org>; Sanchez, Scott (CPC) <scott.sanchez@sfgov.org>; Sider, Dan (CPC) <dan.sider@sfgov.org>; Starr, Aaron (CPC) <aaron.starr@sfgov.org>; Omokaro, Ify (MTA) <Ify.Omokaro@sfmta.com>; Horn, Jeffrey (CPC) <jeffrey.horn@sfgov.org>; Rosenberg, Julie (BOA) <julie.rosenberg@sfgov.org>; Sullivan, Katy (BOA) <katy.sullivan@sfgov.org>; Longaway, Alec (BOA) <alec.longaway@sfgov.org>; BOS-Supervisors <bos-supervisors@sfgov.org>; BOS-Legislative Aides <bos-legislative_aides@sfgov.org>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; Somera, Alisa (BOS) <alisa.somera@sfgov.org>; Mchugh, Eileen (BOS) <eileen.e.mchugh@sfgov.org>; BOS Legislation, (BOS) <bos.legislation@sfgov.org>; Wietgrefe, Wade (CPC) <wade.wietgrefe@sfgov.org>; Lewis, Don (CPC) <don.lewis@sfgov.org>
**Subject:** PROJECT SPONSOR RESPONSE: Appeals of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue - Hearing - September 22, 2020

Greetings,

The Office of the Clerk of the Board has received the following response from the Project Sponsor, Paul Albritton of Mackenzie & Albritton LLP, on behalf of Verizon Wireless, for the appeals of CEQA Exemption Determination and Conditional Use Authorization for the proposed project at 2001 37th Avenue.

Project Sponsor Response - September 22, 2020

Since the agenda packet has already been compiled prior to receiving these documents, it will not be included in the packet, but instead will be included in the official file.

Note: The President may entertain a motion to continue this Hearing and associated Motions to the Board of Supervisors meeting on October 6, 2020.

I invite you to review the entire matter on our Legislative Research Center by following the links below:

Board of Supervisors File No. 200992
Board of Supervisors File No. 200996

Regards,

**Lisa Lew**
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# ST. IGNATIUS COLLEGE PREPARATORY
## EDUCATE. INSPIRE. LAUNCH.

Dear President Yee and Members of the Board of Supervisors,

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

**About Our School**

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

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

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

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

**Why Do We Need Lights?**

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

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

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

**The Project**

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

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

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

**The Conditional Use Permit**

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

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

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

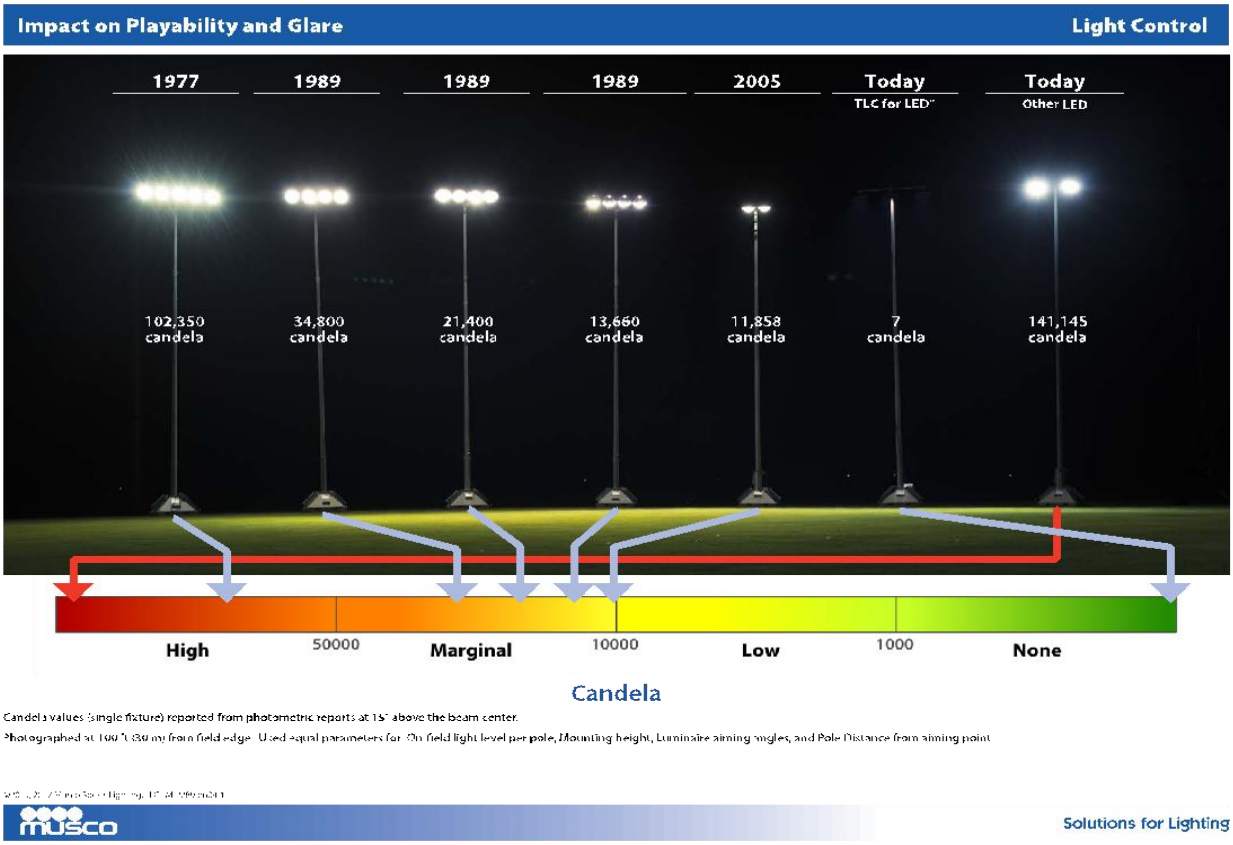
We believe SINA's opposition to the project is based on fundamental misconceptions about the nature of the lights and the intended use of the field, and we believe many of our neighbors have unfortunately been misled by SINA's alarmist (and demonstrably false) statements.

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

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

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

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




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

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

**Murphy Field Use**

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

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

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

**Environmental Review**

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

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

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

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

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

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

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

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

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

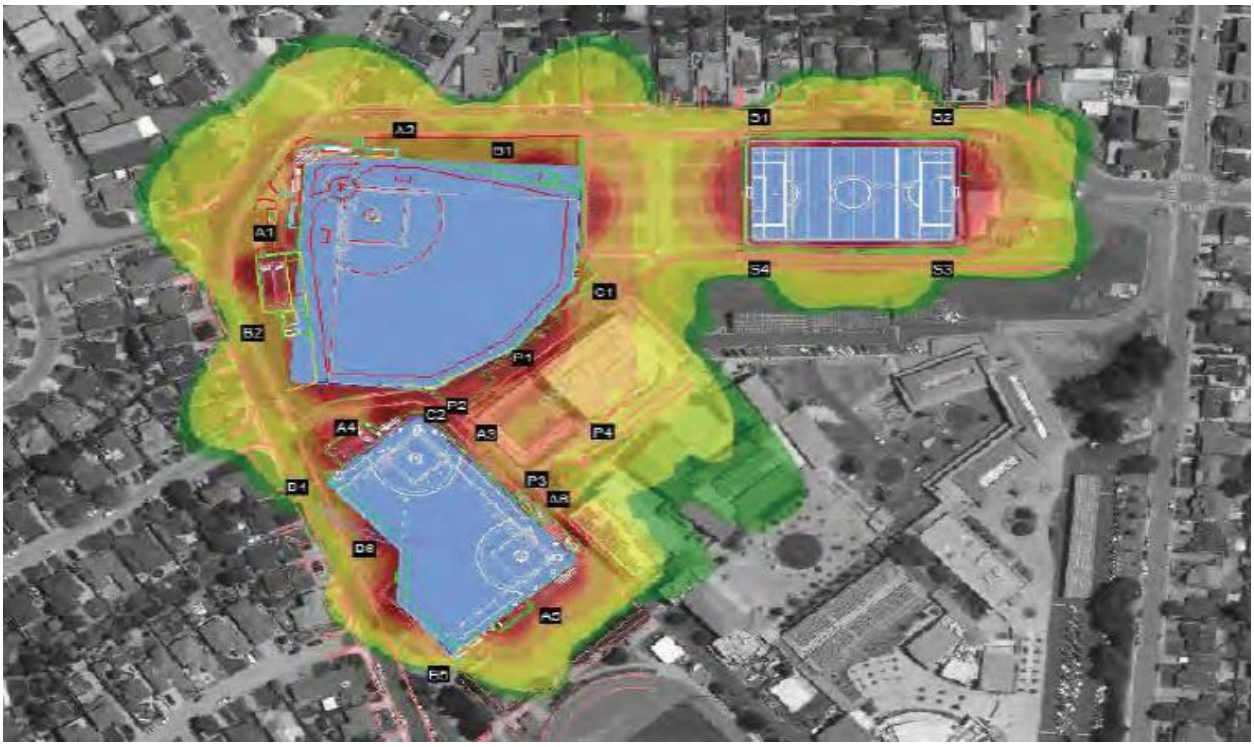
*Aesthetic Impacts*. Ms. Fisher also complains about the aesthetic impacts of the four poles but under CEQA, the only relevant question for a project like this in an urbanized area (aside from light and glare impacts, discussed below) is whether the project conflicts with applicable local regulations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

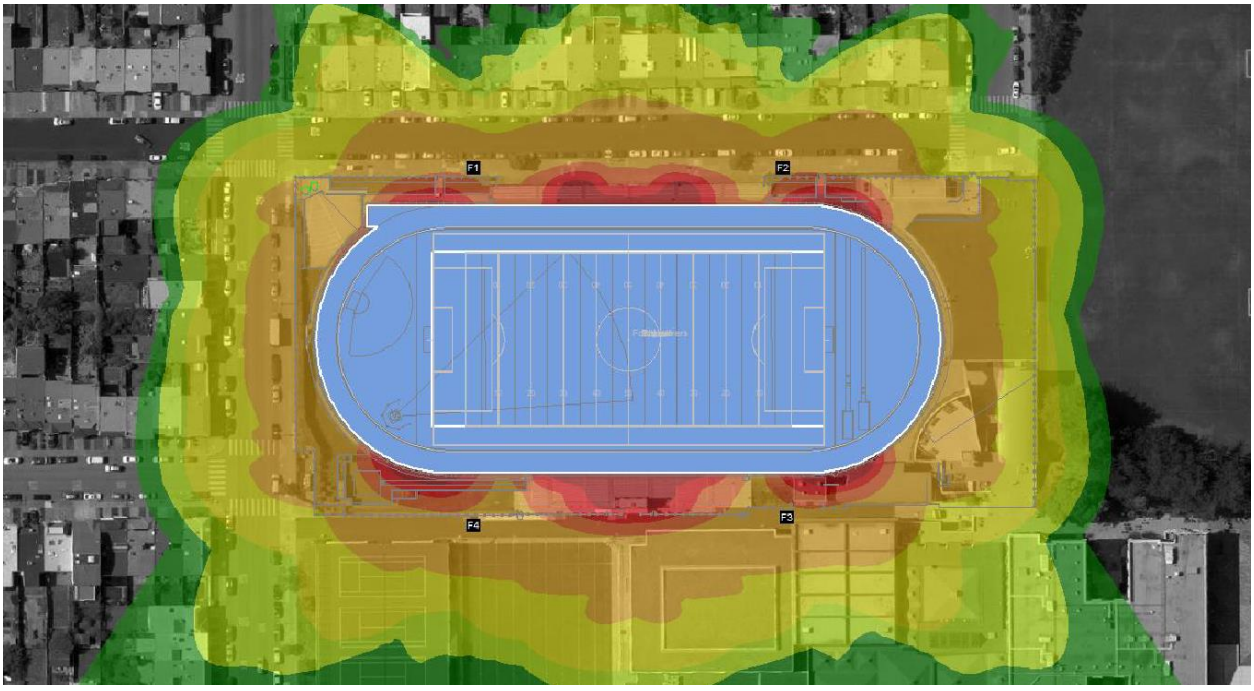
*Impacts on Sensitive Species***.** In addition, Ms. Fisher speculates that noise and lighting from our field could have impacts on "sensitive species." First, our field is artificial turf. It provides no habitat for any species. Second, as explained above, any noise impacts from activities on our field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

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

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

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




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

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

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

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

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

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

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

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

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

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

**Conclusion**

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

Sincerely,

GSE

G. Scott Emblidge
Counsel to St. Ignatius College Preparatory

# Exhibit A

# III. INITIAL STUDY CHECKLIST

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

## I. Aesthetics

Would the Project:

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

**Discussion**

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

campus, the project upgrades would not adversely impact the integrity or views of these historic buildings. The project site is approximately a half of a mile away from U.S. Highway 101 and about one mile from I-280. The project improvements would not be visible from these highways due to the distance from them and the intervening topography and buildings. El Camino Real is located two blocks east of the site. The section near the project site is not designated as a Scenic Road in the San Mateo County General Plan. El Camino Real between Crystal Springs Road in San Mateo and Easton Drive in Burlingame is the only section that is considered a Scenic Road[3]. Therefore, the Project would have **no impact** on scenic vistas or scenic resources.

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

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

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

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

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

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

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

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

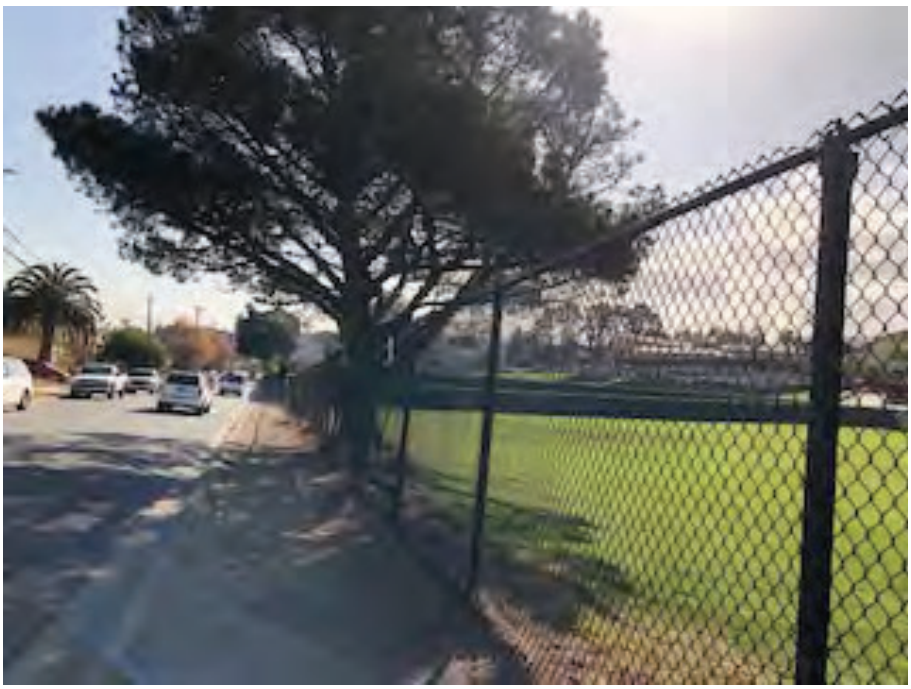


**Figure 7. View from Magnolia Avenue looking east – baseball field visible in background.**

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

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

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

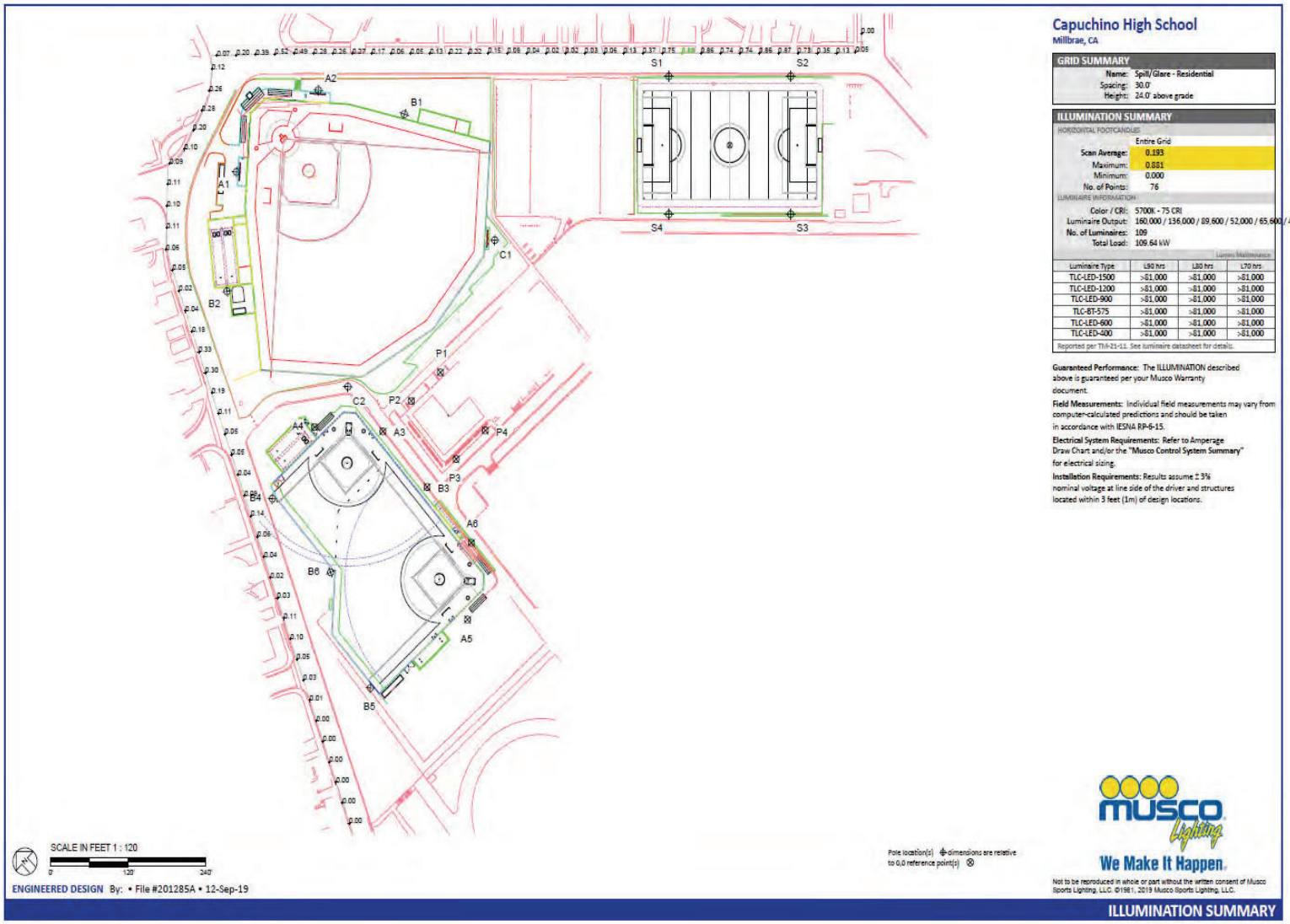
**Figure 12. View from Park Boulevard looking north with Baseball Field on the right and single-family homes on the left**

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

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

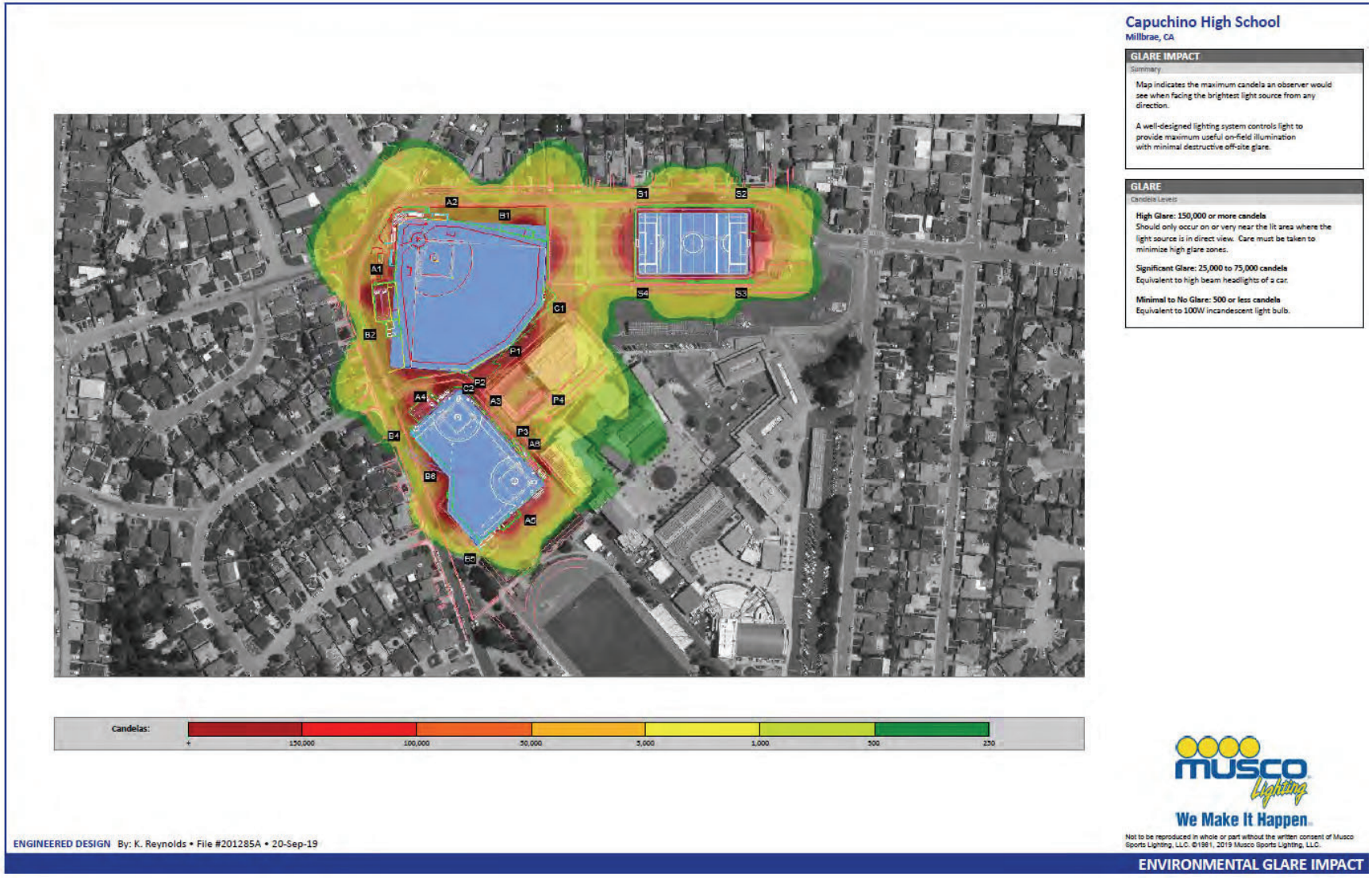
The proposed sports lighting for the softball and baseball fields is designed to control light to maximize illumination on the field and minimize off-site light and glare. The proposed lighting would be less impactful and more focused than older systems. Light and glare studies prepared by Musco Sports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

**Figure 13. Illumination Summary**




Source: Musco Sports Lighting, LLC, 2019

**Figure 14. Glare Impact Map**




Source: Musco Sports Lighting, LLC, 2019

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

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

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

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

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

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

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

| | |
|---|---|
| **From:** | BOS Legislation, (BOS) |
| **To:** | mwgraf@aol.com; sisunsetneighbors@hotmail.com; Scott Emblidge; chad.christie@ridgecommunicate.com; kstupi@siprep.org; pa@mallp.com |
| **Cc:** | Storrs, Bruce (DPW); Tse, Bernie (DPW); Rivera, Javier (DPW); Duran, Vanessa (DPW); Wong, Jason (DPW); PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Varat, Adam (CPC); Rodgers, AnMarie (CPC); Navarrete, Joy (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Omokaro, Ify (MTA); Horn, Jeffrey (CPC); Rosenberg, Julie (BOA); Sullivan, Katy (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS); Wietgrefe, Wade (CPC); Lewis, Don (CPC) |
| **Subject:** | PROJECT SPONSOR RESPONSE: Appeals of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue - Hearing - September 22, 2020 |
| **Date:** | Tuesday, September 22, 2020 11:56:37 AM |
| **Attachments:** | image001.png |

Greetings,

The Office of the Clerk of the Board has received the following response from the Project Sponsor, Paul Albritton of Mackenzie & Albritton LLP, on behalf of Verizon Wireless, for the appeals of CEQA Exemption Determination and Conditional Use Authorization for the proposed project at 2001 37th Avenue.

Project Sponsor Response - September 22, 2020

Since the agenda packet has already been compiled prior to receiving these documents, it will not be included in the packet, but instead will be included in the official file.

Note: The President may entertain a motion to continue this Hearing and associated Motions to the Board of Supervisors meeting on October 6, 2020.

I invite you to review the entire matter on our Legislative Research Center by following the links below:

Board of Supervisors File No. 200992
Board of Supervisors File No. 200996

Regards,

**Lisa Lew**
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org

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**MACKENZIE & ALBRITTON LLP**
155 SANSOME STREET, SUITE 800
SAN FRANCISCO, CALIFORNIA 94104

TELEPHONE 415 / 288-4000
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September 22, 2020

**VIA EMAIL**

President Norman Yee
Supervisors Sandra Lee Fewer,
Catherine Stefani, Aaron Peskin,
Gordon Mar, Dean Preston, Matt Haney,
Rafael Mandelman, Hillary Ronen,
Shamann Walton, and Ahsha Safai
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
San Francisco, California 94102

Re: Verizon Wireless Response to Appeal
Collocated Telecommunications Facility, 2001 37th Avenue
(St. Ignatius College Preparatory)
Board of Supervisors Agenda, September 22, 2020

Dear President Yee and Supervisors:

We write on behalf of Verizon Wireless to ask that you uphold the approval of the Planning Commission and deny the appeal filed by the Saint Ignatius Neighborhood Association ("Appellant") of a wireless facility collocated on proposed new stadium lighting at the St. Ignatius College Preparatory school (the "Approved Facility"). Verizon Wireless designed the Approved Facility to provide needed service with minimal impact. As confirmed by the Planning Commission, the Approved Facility meets all findings for approval under San Francisco's Code (the "Code"). Appellant does not present any substantial evidence to warrant denial of the Approved Facility. Further, because the Approved Facility will fill a significant gap in Verizon Wireless service, and there is no less intrusive alternative, denial would violate the federal Telecommunications Act. We urge you to reject the appeal and approve the Approved Facility.

## I. The Project

St. Ignatius College Preparatory school has proposed to add four 90-foot stadium lights to an existing field stadium at its private secondary school. The Approved Facility has been thoughtfully designed to minimize any impact by locating on the northwest light standard. Verizon Wireless proposes to place nine panel antennas, three integrated radio antenna units, six remote radio units, two surge suppressors, and ancillary equipment

within a 12-foot by 28-foot fenced area located on the ground, adjacent to the light standard.

Photosimulations of the Approved Facility are attached as Exhibit A. A report prepared by third-party consulting engineers, attached as Exhibit B, confirms that radio frequency ("RF") exposure from the Approved Facility will fully comply with Federal Communications Commission ("FCC") guidelines.

## II. The Approved Facility Satisfies All Findings For A Special Use Permit.

As confirmed by the Planning Commission's approval, the Approved Facility meets all requirements for approval of a conditional use authorization, including the Planning Department's Wireless Telecommunications Services Facilities Siting Guidelines (the "WTS Guidelines"), as detailed by the Planning Commission. Notably, the Approved Facility will not be detrimental to public health, safety or welfare, because radio frequency emissions will fall well under FCC exposure guidelines, and the facility will not be accessible to the public.

The Approved Facility satisfies all development standards, including the location preferences in the WTS Guidelines. WTS Guidelines, §8.1. The WTS Guidelines establish five categories of preferred location sites, and the Approved Facility qualifies for the two most preferred locations. The first location, "publicly-used structures," includes "[w] here the installation complies with all FCC regulations and standards, schools, hospitals, health centers, places of worship, or other institutional structures. . . ." WTS Guidelines, §8.1.1. Here, the Approved Facility complies with all FCC regulations and standards, as established by the third-party engineer's report and also because it is located at a school. San Francisco's Department of Public Health have reviewed this report and independently approved it. Exhibit C.

The second location preference, "co-location site," is for "[a]ny existing site on which a legal wireless telecommunications facility is currently located shall be a Preferred Location Site regardless of the underlying zoning designation of the site. . . ." WTS Guidelines, §8.1.2. Both AT&T Mobility and T-Mobile have wireless facilities on the three-story classroom building about 490 feet to the northeast of the Approved Facility at the school.

There will be no impact to views, as the Approved Facility will be located on the school's proposed light standards. The Approved Facility will not increase the height of the lights and will use its existing infrastructure. The Approved Facility is necessary and desirable because it will improve wireless connectivity for residents, visitors, and emergency personnel, with minimal impact on the neighborhood.

In sum, the Approved Facility satisfies all requirements for approval.

## III. Verizon Wireless Has Presented Substantial Evidence For Approval, And Appellant Presents No Substantial Evidence To Warrant Denial

Under the federal Telecommunications Act, a local government's denial of a wireless facility application must be based on "substantial evidence." *See* 47 U.S.C. § 332(c)(7)(B)(iii). A denial of an application must be based on requirements set forth in the local code and supported by evidence in the record. *See Metro PCS, Inc. v. City and County of San Francisco,* 400 F.3d 715, 725 (9th Cir. 2005) (denial of application must be "authorized by applicable local regulations and supported by a reasonable amount of evidence"). While a local government may regulate the placement of wireless facilities based on aesthetics, mere generalized concerns or opinions about aesthetics or compatibility with a neighborhood do not constitute substantial evidence upon which a local government could deny a permit. *See City of Rancho Palos Verdes v. Abrams* (2002) 101 Cal. App. 4th 367, 381.

As set forth above, Verizon Wireless has provided substantial evidence to show that the Approved Facility complies with all requirements for approval under the Code. Among other evidence, photosimulations demonstrate the minimal impact of Verizon Wireless's collocated antennas, painted to match. The submitted reports confirm that radio frequency exposure will comply with FCC guidelines, and noise emissions comply with City limits.

In contrast, Appellant has provided no evidence – let alone the substantial evidence required by federal law – to support denial of the Approved Facility. Appellant presents no evidence to contradict the Planning Commission's findings for approval. We respond to Appellant's various grounds for appeal below.

## IV. The Planning Commission Properly Determined That The Approved Facility Is Exempt From CEQA

Appellant challenges the Planning Commission's exemption of the Approved Facility from the California Environmental Quality Act (Pub. Res. Code §§21000-21189.3) ("CEQA") and the Guidelines for Implementation of the California Environmental Quality Act (14 Cal. Code Regs. §§15000-15387) ("CEQA Guidelines"). The Approved Facility qualifies for a Class 3 categorical exemption, which applies to new construction of small facilities or structures. 14 Cal. Code Regs. §15303. Courts have consistently upheld the application of the Class 3 exemption to a wide variety of wireless and telecommunications projects. *See Don't Cell Our Parks v. City of San Diego* (2018) 21 Cal.App.5th 338 (faux tree telecommunications pole in public park); *Aptos Residents Ass'n v. County of Santa Cruz* (2018) 20 Cal.App.5th 1039 (10 microcell transmitter units on existing utility poles); *Robinson v. City and County of San Francisco* (2012) 208 Cal.App.4th 950 (40 wireless equipment cabinets on existing utility poles); *San Francisco Beautiful v. City and County of San Francisco* (2014) 226 Cal.App.4th 1012 (726 new utility cabinets on public sidewalks).

The CEQA Guidelines provide examples of the Class 3 exemption, including multi-family residential structures; a store, motel, office, restaurant or similar structure not exceeding 2,500 square feet in floor area; and in urbanized areas, up to four commercial buildings, not exceeding 10,000 square feet in floor area. 14 Cal. Code Regs. §15303. The Approved Facility has a much smaller footprint than these examples, with only a 336-square foot equipment enclosure and minimal equipment attached to a stadium light standard.

Finally, Appellant claims that exceptions to the Class 3 exemption preclude its use. 14 Cal. Code Regs. §15300.2. However, Appellant has not contended that any of these exceptions apply to the Approved Facility.

In sum, Appellant raises no grounds for appeal that constitute substantial evidence to deny the Approved Facility. In contrast, Verizon Wireless has provided ample evidence that the Approved Facility complies with all City requirements. The appeal must be rejected.

## IV. The Appeal Must Be Denied To Avoid An Unlawful Prohibition Of Service

A local government's denial of a permit for a wireless facility violates the "effective prohibition" clause of the federal Telecommunications Act if the wireless provider can show two things: (1) that it has a "significant gap" in service; and (2) that the proposed facility is the "least intrusive means," in relation to the land use values embodied in local regulations, to address the gap. *See T-Mobile USA, Inc. v. City of Anacortes,* 572 F.3d 987 (9th Cir. 2009).

If a provider proves both elements, the local government *must* approve the facility, even if there is substantial evidence to deny the permit under local land use provisions (which there is not in this case). This is because the provider has met the requirements for federal preemption; i.e., denial of the permit would "have the effect of prohibiting the provision of personal wireless services." 47 U.S.C. § 332(c)(7)(B)(1)(ii); *T-Mobile v. Anacortes,* 572 F.3d at 999. To avoid such preemption, the local government must show that another alternative is available, technologically feasible, and less intrusive than the proposed facility. *T-Mobile v. Anacortes*, 572 F.3d at 998-999.

### A. Verizon Wireless Has Demonstrated a Significant Gap in Service.

Verizon Wireless has identified a significant gap in its LTE service coverage in the area surrounding the St. Ignatius school in the Sunset District. Verizon Wireless's small cell facilities in the greater vicinity are too distant to serve the gap. The significant gap is described in the coverage maps, attached as Exhibit D. The existing coverage map shows a lack in-building LTE coverage on nearby school properties and the residential neighborhoods to the west and south. There is a lack of in-vehicle coverage along local roads to the west, north and east, and along a 0.6-mile stretch of major thoroughfare Sunset Boulevard to the east. The proposed coverage map shows that the Approved Facility will provide reliable new in-building coverage to the school properties and

residential neighborhoods, as well as new in-vehicle coverage to local roadways and Sunset Boulevard.

A third-party engineering firm, approved by the City, independently verified this gap by reviewing the maps and conducting their own drive test, attached as Exhibit E. They concluded that "Based on the measurement data, we conclude that the Verizon 4G LTE coverage map showing the service area without the proposed installation includes areas of relatively weak signal levels in the carrier's present coverage."

### B. The Approved Facility is the Least Intrusive Means To Fill the Significant Gap in Service.

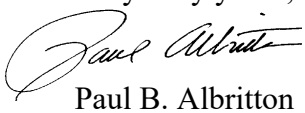
In an effort to address the significant gap, Verizon Wireless searched for a site that qualified for the WTS Guidelines' Code's top two preferences for wireless facility placement.

In short, Verizon Wireless has identified a significant gap in coverage and has shown that the Approved Facility is the least intrusive means to address it, based on the values expressed in City regulations. Under these circumstances, Verizon Wireless has established that denial of the Approved Facility would constitute an unlawful prohibition of service.

## V. Conclusion

Verizon Wireless has worked diligently to identify the ideal location and design for a new facility to serve the south Monterey area. As confirmed by the Planning Commission, the Approved Facility meets all findings for approval under the Code. Appellant raises no substantial evidence to contradict this approval. Ensuring reliable Verizon Wireless service in Monterey is critical to residents and visitors as well as emergency service personnel. We strongly encourage you to affirm the Planning Commission's approval, and to deny the appeal.

Very truly yours,



Paul B. Albritton

cc: Jeff Horn
Bill Sanders
Jocelyn Wong

**Schedule of Exhibits**

Exhibit A: Photosimulations
Exhibit B: Radio Frequency Exposure Report by Hammett & Edison, Inc.
Exhibit C: DPH Approval
Exhibit D: Engineering Necessity Case
Exhibit E: Hammett & Edison, Inc. Peer Review of Necessity

# Exhibit A

verizon

**Sunset & Noriega Site # 255926**

Looking Southeast from 39th Ave.

2001 37th Ave.
San Francisco, CA

View #1

2/6/20

insight photosim (707) 315-1585

verizon

**Sunset & Noriega Site # 255926**

Looking Northeast from 39th Ave.

2001 37th Ave.
San Francisco, CA

2/6/20

View #2

insight photosim (707) 315-1585

**Exhibit B**

## Statement of Hammett & Edison, Inc., Consulting Engineers

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained on behalf of Verizon Wireless, a personal wireless telecommunications carrier, to evaluate the base station (Site No. 255926 "Sunset & Noriega") proposed to be located at 2001 37th Avenue in San Francisco, California, for compliance with appropriate guidelines limiting human exposure to radio frequency ("RF") electromagnetic fields.

## Background

The San Francisco Department of Public Health has adopted an 11-point checklist for determining compliance of proposed WTS facilities or proposed modifications to such facilities with prevailing safety standards. The acceptable exposure limits set by the FCC are shown in Figure 1. The most restrictive limit for exposures of unlimited duration at several wireless service bands are as follows:

| Wireless Service Band | Transmit Frequency | "Uncontrolled" Public Limit | Occupational Limit (5 times Public) |
|---|---|---|---|
| Microwave (point-to-point) | 1–80 GHz | 1.0 mW/cm$^2$ | 5.0 mW/cm$^2$ |
| Millimeter-wave | 24–47 | 1.0 | 5.0 |
| Part 15 (WiFi & other unlicensed) | 2–6 | 1.0 | 5.0 |
| CBRS (Citizens Broadband Radio) | 3,550 MHz | 1.0 | 5.0 |
| BRS (Broadband Radio) | 2,490 | 1.0 | 5.0 |
| WCS (Wireless Communication) | 2,305 | 1.0 | 5.0 |
| AWS (Advanced Wireless) | 2,110 | 1.0 | 5.0 |
| PCS (Personal Communication) | 1,930 | 1.0 | 5.0 |
| Cellular | 869 | 0.58 | 2.9 |
| SMR (Specialized Mobile Radio) | 854 | 0.57 | 2.85 |
| 700 MHz | 716 | 0.48 | 2.4 |
| 600 MHz | 617 | 0.41 | 2.05 |
| [most restrictive frequency range] | 30–300 | 0.20 | 1.0 |

## Checklist

Reference has been made to information provided by Verizon, including zoning drawings by Streamline Engineering and Design, Inc., dated April 16, 2019. It should be noted that the calculation results in this Statement include several "worst-case" assumptions and therefore are expected to overstate actual power density levels from the proposed operations. Figure 2 describes the calculation methodologies, reflecting the facts that a directional antenna's radiation pattern is not fully formed at locations very close by (the "near-field" effect) and that at greater distances the power level from an energy source decreases with the square of the distance from it (the "inverse square law"). This methodology is an industry standard for evaluating RF exposure conditions and has been demonstrated through numerous field tests to be a conservative prediction of exposure levels.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1. *The location, identity, and total number of all operational radiating antennas installed at this site.*

There are reported no wireless base stations installed at or near the site, a 90-foot stadium light pole sited next to the north end of the bleachers on the west side of the football field at St. Ignatius College Preparatory, located at 2001 37th Avenue.

2. *List all radiating antennas located within 100 feet of the site that could contribute to the cumulative radio frequency energy at this location.*

There were observed similar antennas for use by AT&T Mobility and T-Mobile located on the three-story classroom building about 490 feet to the northeast.

3. *Provide a narrative description of the proposed work for this project.*

Verizon proposes to install twelve antennas. This is consistent with the scope of work described in the drawings for transmitting elements.

4. *Provide an inventory of the make and model of antennas or transmitting equipment being installed or removed.*

Verizon proposes to install twelve directional panel antennas – three CommScope Model NNH4-65A-R6, three Ericsson Model 6701, and six Ericsson Model 2208 – on the 90-foot tall light pole. The antennas would employ up to 4° downtilt, would be mounted at effective heights of about 63, 45, and 50 feet above ground, respectively, and would be oriented in identical groups of four at about 120° spacing, to provide service in all directions.

For the limited purpose of this study, it is assumed that AT&T has installed Kathrein Model 800-10964 and CommScope Model JAHH-65A directional panel antennas, employing up to 6° downtilt and mounted at an effective height of about 42 feet above ground, and that T-Mobile has installed Ericsson Model AIR21 and RFS Model APXVARR24 directional panel antennas, employing 2° downtilt and mounted at an effective height of about 42 feet above ground.

5. *Describe the existing radio frequency energy environment at the nearest walking/working surface to the antennas and at ground level. This description may be based on field measurements or calculations.*

There is no installed access to the antenna location. The maximum measured* RF level for a person at ground near the site was 0.0013 mW/cm$^2$, which is 0.65% of the most restrictive public limit.

* February 13, 2019, using calibrated Narda Type NBM-520 Broadband Field Meter with Type EF-0391 Isotropic Broadband Electric Field Probe (Serial No. D-0454).


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6. *Provide the maximum effective radiated power per sector for the proposed installation. The power should be reported in watts and reported both as a total and broken down by frequency band.*

The maximum effective radiated power proposed by Verizon in any direction is 18,545 watts, representing simultaneous operation at 193 watts for 28 GHz, 172 watts for CBRS, 5,250 watts for AWS, 5,130 watts for PCS, 4,170 watts for cellular, and 3,630 watts for 700 MHz service.

7. *Describe the maximum cumulative predicted radio frequency energy level for any nearby publicly accessible building or area.*

The maximum calculated cumulative level at any nearby building is 11% of the public limit; this occurs at the school buildings located about 240 feet to the northeast. The maximum calculated cumulative level at the nearby bleachers is 6.9% of the public exposure limit. The maximum calculated cumulative level at the second-floor elevation of any nearby residence† is 7.4% of the public exposure limit.

8. *Report the estimated cumulative radio frequency fields for the proposed site at ground level.*

For a person anywhere at ground, the maximum RF exposure level due to the proposed Verizon operation by itself is calculated to be 0.032 mW/cm$^2$, which is 5.2% of the applicable public exposure limit. Cumulative RF levels at ground level near the site are therefore estimated to be less than 6% of the applicable public limit.

9. *Provide the maximum distance (in feet) the three dimensional perimeter of the radio frequency energy level equal to the public and occupational exposure limit is calculated to extend from the face of the antennas.*

The three-dimensional perimeters of RF levels equal to the public and occupational exposure limits are calculated to extend up to 94 and 36 feet out from the Verizon antenna faces, respectively, and to much lesser distances above, below, and to the sides; this does not reach any publicly accessible areas.

10. *Provide a description of whether or not the public has access to the antennas. Describe any existing or proposed warning signs, barricades, barriers, rooftop striping or other safety precautions for people nearing the equipment as may be required by any applicable FCC-adopted standards.*

Due to their mounting location and height, the Verizon antennas would not be accessible to unauthorized persons, and so no measures are necessary to comply with the FCC public exposure guidelines. To prevent occupational exposures in excess of the FCC guidelines, it is recommended that appropriate RF safety training, to include review of personal monitor use and lockout/tagout procedures, be provided to all authorized personnel who have access to the structure, including

† Located at least 80 feet to the west, based on photographs from Google Maps.


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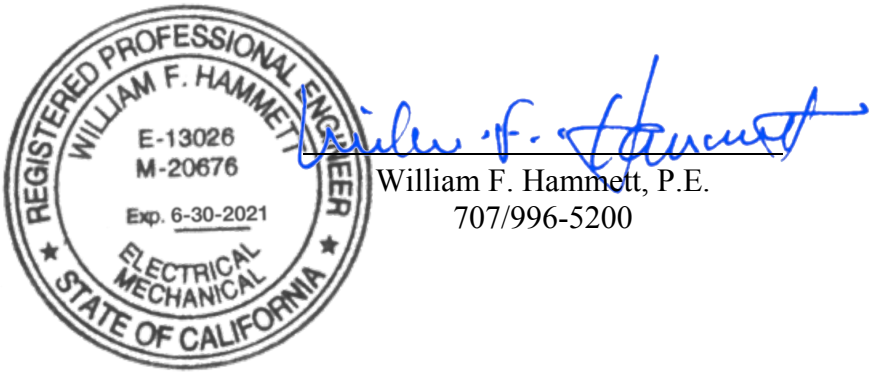
employees and contractors of the wireless carriers and of the property owner. No access within 36 feet directly in front of the Verizon antennas themselves, such as might occur during certain maintenance activities high on the pole, should be allowed while the base station is in operation, unless other measures can be demonstrated to ensure that occupational protection requirements are met. It is recommended that explanatory signs‡ be posted at the antennas and/or on the pole below the antennas, readily visible from any angle of approach to persons who might need to work within that distance.

*11. Statement of authorship and qualification.*

The undersigned author of this statement is a qualified Professional Engineer, holding California Registration Nos. E-13026 and M-20676, which expire on June 30, 2021. This work has been carried out under his direction, and all statements are true and correct of his own knowledge except, where noted, when data has been supplied by others, which data he believes to be correct.

## Conclusion

Based on the information and analysis above, it is the undersigned's professional opinion that operation of the base station proposed by Verizon Wireless at 2001 37th Avenue in San Francisco, California, will comply with the prevailing standards for limiting public exposure to radio frequency energy and, therefore, will not for this reason cause a significant impact on the environment. The highest calculated level in publicly accessible areas is much less than the prevailing standards allow for exposures of unlimited duration. This finding is consistent with measurements of actual exposure conditions taken at other operating base stations. Training authorized personnel and posting explanatory signs are recommended to establish compliance with occupational exposure limits.




William F. Hammett, P.E.
707/996-5200

April 10, 2020

‡ Signs should comply with OET-65 color, symbol, and content recommendations. Contact information should be provided (*e.g.*, a telephone number) to arrange for access to restricted areas. The selection of language(s) is not an engineering matter; the San Francisco Department of Public Health recommends that all signs be written in English, Spanish, and Chinese.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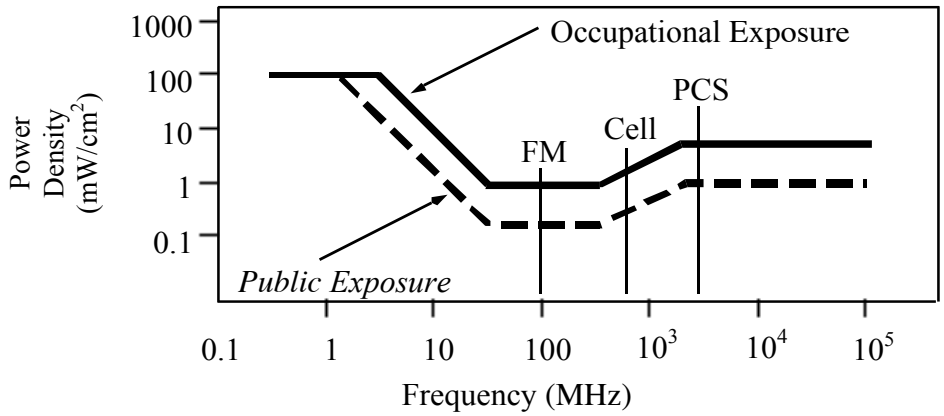
# FCC Radio Frequency Protection Guide

The U.S. Congress required (1996 Telecom Act) the Federal Communications Commission ("FCC") to adopt a nationwide human exposure standard to ensure that its licensees do not, cumulatively, have a significant impact on the environment. The FCC adopted the limits from Report No. 86, "Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," published in 1986 by the Congressionally chartered National Council on Radiation Protection and Measurements ("NCRP"). Separate limits apply for occupational and public exposure conditions, with the latter limits generally five times more restrictive. The more recent standard, developed by the Institute of Electrical and Electronics Engineers and approved as American National Standard ANSI/IEEE C95.1-2006, "Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz," includes similar limits. These limits apply for continuous exposures from all sources and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

As shown in the table and chart below, separate limits apply for occupational and public exposure conditions, with the latter limits (in *italics* and/or dashed) up to five times more restrictive:

| Frequency | Electromagnetic Fields (f is frequency of emission in MHz) | | | | | |
|---|---|---|---|---|---|---|
| Applicable Range (MHz) | Electric Field Strength (V/m) | | Magnetic Field Strength (A/m) | | Equivalent Far-Field Power Density ($mW/cm^2$) | |
| 0.3 – 1.34 | 614 | *614* | 1.63 | *1.63* | 100 | *100* |
| 1.34 – 3.0 | 614 | *823.8/ f* | 1.63 | *2.19/ f* | 100 | *180/ $f^2$* |
| 3.0 – 30 | 1842/ f | *823.8/ f* | 4.89/ f | *2.19/ f* | 900/ $f^2$ | *180/ $f^2$* |
| 30 – 300 | 61.4 | *27.5* | 0.163 | *0.0729* | 1.0 | *0.2* |
| 300 – 1,500 | $3.54\sqrt{f}$ | *$1.59\sqrt{f}$* | $\sqrt{f}/106$ | *$\sqrt{f}/238$* | f/300 | *f/1500* |
| 1,500 – 100,000 | 137 | *61.4* | 0.364 | *0.163* | 5.0 | *1.0* |




Higher levels are allowed for short periods of time, such that total exposure levels averaged over six or thirty minutes, for occupational or public settings, respectively, do not exceed the limits, and higher levels also are allowed for exposures to small areas, such that the spatially averaged levels do not exceed the limits. However, neither of these allowances is incorporated in the conservative calculation formulas in the FCC Office of Engineering and Technology Bulletin No. 65 (August 1997) for projecting field levels. Hammett & Edison has incorporated those formulas in a computer program capable of calculating, at thousands of locations on an arbitrary grid, the total expected power density from any number of individual radio frequency sources. The program allows for the inclusion of uneven terrain in the vicinity, as well as any number of nearby buildings of varying heights, to obtain more accurate projections.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## RFR.CALC™ Calculation Methodology

### Assessment by Calculation of Compliance with FCC Exposure Guidelines

The U.S. Congress required (1996 Telecom Act) the Federal Communications Commission ("FCC") to adopt a nationwide human exposure standard to ensure that its licensees do not, cumulatively, have a significant impact on the environment. The maximum permissible exposure limits adopted by the FCC (see Figure 1) apply for continuous exposures from all sources and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health. Higher levels are allowed for short periods of time, such that total exposure levels averaged over six or thirty minutes, for occupational or public settings, respectively, do not exceed the limits.

**Near Field.**
Prediction methods have been developed for the near field zone of panel (directional) and whip (omnidirectional) antennas, typical at wireless telecommunications base stations, as well as dish (aperture) antennas, typically used for microwave links. The antenna patterns are not fully formed in the near field at these antennas, and the FCC Office of Engineering and Technology Bulletin No. 65 (August 1997) gives suitable formulas for calculating power density within such zones.

For a panel or whip antenna, power density $S = \frac{180}{\theta_{BW}} \times \frac{0.1 \times P_{net}}{\pi \times D \times h}$, in $mW/cm^2$,

and for an aperture antenna, maximum power density $S_{max} = \frac{0.1 \times 16 \times \eta \times P_{net}}{\pi \times h^2}$, in $mW/cm^2$,

where $\theta_{BW}$ = half-power beamwidth of antenna, in degrees,
$P_{net}$ = net power input to antenna, in watts,
$D$ = distance from antenna, in meters,
$h$ = aperture height of antenna, in meters, and
$\eta$ = aperture efficiency (unitless, typically 0.5-0.8).

The factor of 0.1 in the numerators converts to the desired units of power density.

**Far Field.**
OET-65 gives this formula for calculating power density in the far field of an individual RF source:

power density $S = \frac{2.56 \times 1.64 \times 100 \times RFF^2 \times ERP}{4 \times \pi \times D^2}$, in $mW/cm^2$,

where ERP = total ERP (all polarizations), in kilowatts,
RFF = three-dimensional relative field factor toward point of calculation, and
D = distance from antenna effective height to point of calculation, in meters.

The factor of 2.56 accounts for the increase in power density due to ground reflection, assuming a reflection coefficient of 1.6 (1.6 x 1.6 = 2.56). The factor of 1.64 is the gain of a half-wave dipole relative to an isotropic radiator. The factor of 100 in the numerator converts to the desired units of power density. This formula is used in a computer program capable of calculating, at thousands of locations on an arbitrary grid, the total expected power density from any number of individual radio frequency sources. The program also allows for the inclusion of uneven terrain in the vicinity, as well as any number of nearby buildings of varying heights, to obtain more accurate projections.


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**Exhibit C**

**San Francisco City and County**
**Department of Public Health**

**Environmental Health Branch**

London Breed, *Mayor*
Grant Colfax, MD, *Director of Health*

Stephanie K.J. Cushing, MSPH, CHMM, REHS
*Director of Environmental Health*

**Review of Cellular Antenna Site Proposals**

**Project Sponsor :** *Verizon* **Planner:** *Ashley Lindsay*

**RF Engineer Consultant:** *Hammett & Edison* **Phone Number:** *(707) 996-5200*

**Project Address/Location:** *2001 37th Av*

**Site ID:** *521* **SiteNo.:** *SF05300A* **Report Dated:** *4/10/2020*

The following information is required to be provided before approval of this project can be made. These information requirements are established in the San Francisco Planning Department Wireless Telecommunications Services Facility Sitting Guidelines dated August 1996.

In order to facilitate quicker approval of this project, it is recommended that the project sponsor review this document before submitting the proposal to ensure that all requirements are included.

X 1. The location, identity and total number of all operational radiating antennas installed at this site was provided. (WTS-FSG, Section 10.4.1, Section 11, 2b)

Number of Existing Antennas: **0**

X 2. A list of all radiating antennas located within 100 feet of the site which could contribute to the cumulative radio frequency energy at this location was provided. (WTS-FSG, Section 10.5.2)

◉ **Yes** ○ **No**

X 3. A narrative description of the proposed work for this project was provided. The description should be consistent with scope of work for the final installation drawings. (WTS-FSG, Section 10)

◉ **Yes** ○ **No**

X 4. An inventory of the make and model of antennas or transmitting equipment being installed or removed was provided. The antenna inventory included the proposed installation height above the nearest walking/working surface, the height above ground level and the orientations of the antennas. (WTS-FSG, Section 10.5.2)

◉ **Yes** ○ **No**

X 5. A description of the existing radio frequency energy environment at the nearest walking/working surface to the antennas and at ground level was provided. A description of any assumptions made when doing the calculations was also provided. (WTS-FSG, Section 10.4.1a, Section 10.4.1c, Section 10.5)

◉ **Yes** ○ **No**

X 6. The maximum effective radiated power per sector for the proposed installation was provided along with the frequency bands used by the antennas. (WTS-FSG, Section 10.1.2, Section 10.5.1)

Maximum Effective Radiated Power: **18545** Watts

X 7. Based on the antenna orientation, the maximum cumulative predicted radio frequency energy level for any nearby publicly accessible building or area was provided. (WTS-FSG, Section 10.4, Section 10.5.1)

Maximum percent of applicable FCC public standard at the nearest building or structure: **11** %

Distance to this nearby building or structure: **240** feet

X 8. The estimated maximum cumulative radio frequency fields for the proposed site at ground level. (WTS-FSG, Section 10.5)

Maximum RF Exposure: **0.032** $mW/cm^2$ Maximum RF Exposure Percent: **5.2** %

X 9. The maximum distance (in feet) the three dimensional perimeter of the radio frequency energy level equal to the public and occupational exposure limit is calculated to extend from the face of the antennas was provided. Any potential walking/working surfaces exceeding regulatory standards were identified. (WTS-FSG, Section 10.9.2)

☑ Public Exclusion Area — Public Exclusion In Feet: **94**

☑ Occupational Exclusion Area — Occupational Exclusion In Feet: **36**

X 10. A description of whether or not the public has access to the antennas was provided. A description was also provided of any existing or proposed warning signs, barricades, barriers, rooftop stripping or other safety precautions for people nearing the equipment as may be required by any applicable FCC-adopted standards. All signs will be provided in English, Spanish and Chinese. (WTS-FSG, Section 9.5, Section 10.9.2)

◉ **Yes** ○ **No**

X 11. Statement regarding the engineer who produced the report and their qualifications was provided. The engineer is licensed in the State of California. (WTS-FSG, Section 11,8)

◉ **Yes** ○ **No**

X **Approved**. Based on the information provided the following staff believes that the project proposal will comply with the current Federal Communication Commission safety standards for radiofrequency radiation exposure. FCC standard CFR47 1.1310 **Approval of the subsequent Project Implementation Report is based on project sponsor completing recommendations by project consultant and DPH.**

***Comments:***

There are no antennas existing operated by Verizon installed on the roof top of the building at 2001 37th Av. Existing RF levels at ground level were around 1% of the FCC public exposure limit. No other antennas were observed within 100 feet of this site. Verizon proposes to install 12 new antennas. The antennas are mounted at a height of 45- 63 feet above the ground. The estimated ambient RF field from the proposed Verizon transmitters at ground level is calculated to be 0.032 mW/sq cm., which is 5.2 % of the FCC public exposure limit. The three dimensional perimeter of RF levels equal to the public exposure limit extends 94 feet and does not reach any publicly accessible areas. Warning signs must be posted at the antennas and roof access points in English, Spanish and Chinese. Workers should not have access to within 36 feet of the front of the antennas while they are in operation.

___ **Not Approved**, additional information required.

___ **Not Approved**, does not comply with Federal Communication Commission safety standards for radiofrequency radiation exposure. FCC Standard

1 Hours spent reviewing

Charges to Project Sponsor (in addition to previous charges, to be received at time of receipt by Sponsor)

Dated: 4/20/2020

Signed: _____

**Arthur Duque**
Environmental Health Management Section
San Francisco Dept. of Public Health
1390 Market St., Suite 210,
San Francisco, CA. 94102
(415) 252-3966

Exhibit D

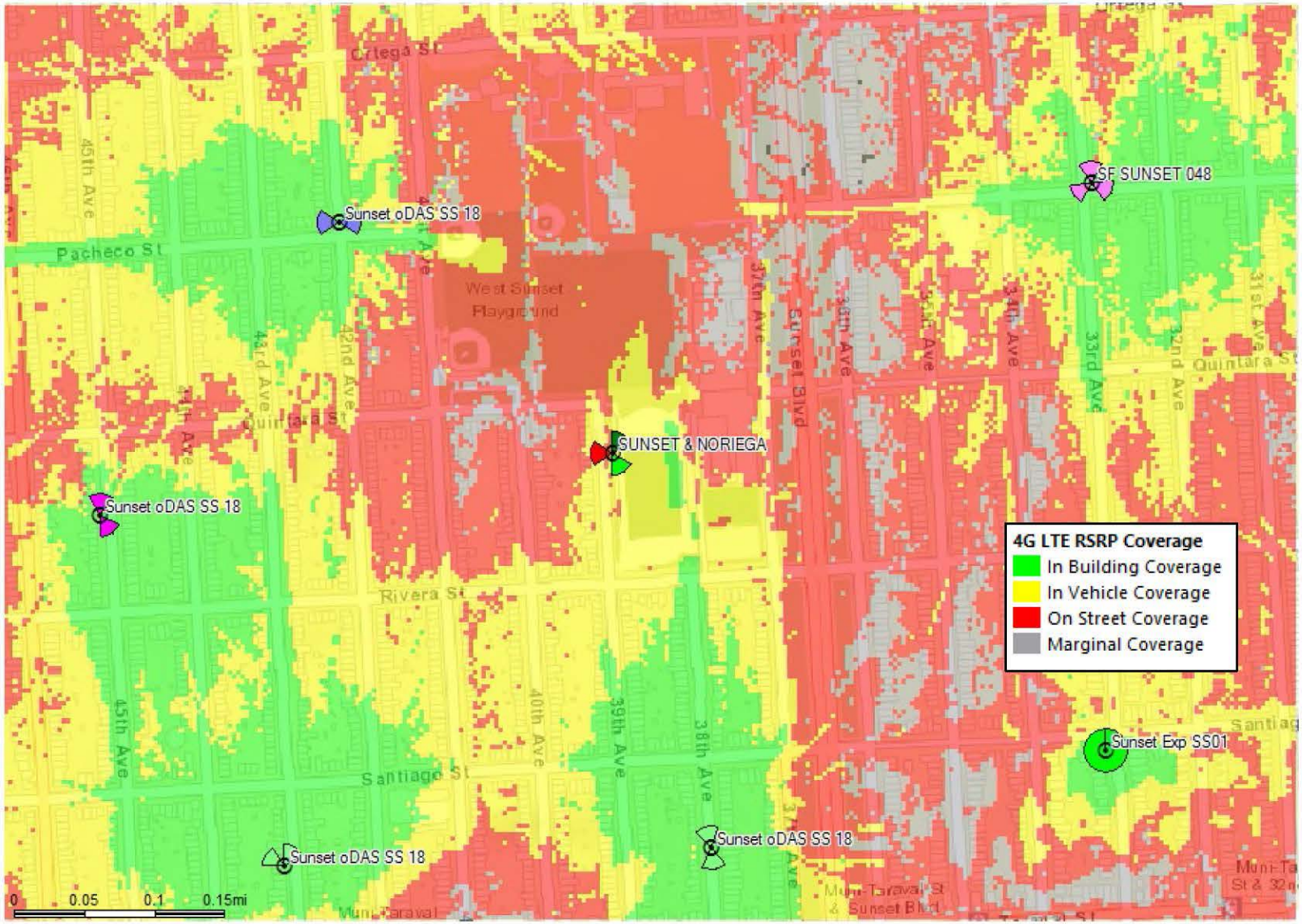
# SUNSET & NORIEGA

March 30th, 2020

verizon

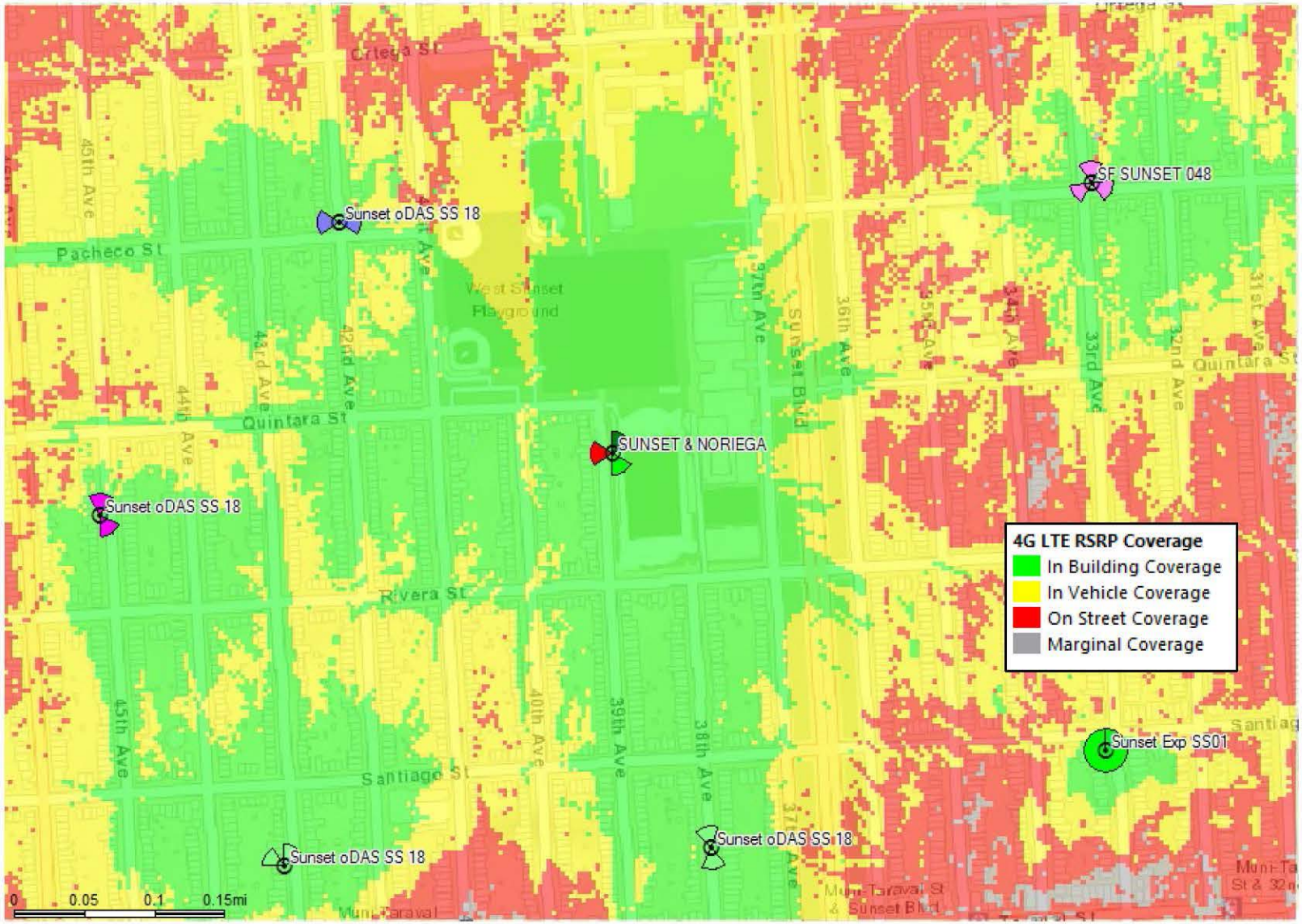
Confidential and proprietary materials for authorized Verizon personnel and outside agencies only. Use, disclosure or distribution of this material is not permitted to any unauthorized persons or third parties except by written agreement.

# Existing LTE Coverage




Confidential and proprietary materials for authorized Verizon personnel and outside agencies only. Use, disclosure or distribution of this material is not permitted to any unauthorized persons or third parties except by written agreement.

# Proposed LTE Coverage




Confidential and proprietary materials for authorized Verizon personnel and outside agencies only. Use, disclosure or distribution of this material is not permitted to any unauthorized persons or third parties except by written agreement.

**Exhibit E**


# HAMMETT & EDISON, INC.
CONSULTING ENGINEERS
BROADCAST & WIRELESS

WILLIAM F. HAMMETT, P.E.
RAJAT MATHUR, P.E.
ROBERT P. SMITH, JR.
ANDREA L. BRIGHT, P.E.
NEIL J. OLIJ, P.E.
MANAS REDDY, P.E.
BRIAN F. PALMER
M. DANIEL RO

ROBERT L. HAMMETT, P.E.
*1920-2002*
EDWARD EDISON, P.E.
*1920-2009*

DANE E. ERICKSEN, P.E.
*CONSULTANT*


**BY EMAIL CHAD.CHRISTIE@RIDGECOMMUNICATE.COM**

April 10, 2020

Mr. Chad Christie
Ridge Communications
949 Antiquity Drive
Fairfield, California 94534

Dear Chad:

As you requested, we have conducted the review required by the City of San Francisco of the coverage maps that Verizon Wireless will submit as part of its application package for its base station proposed to be located at 2001 37th Avenue (Site No. 255926 "Sunset & Noriega"). This is to fulfill the submittal requirements for Planning Department review.

## Executive Summary

We concur with the maps provided by Verizon. The maps provided to show the before and after conditions are reasonable representations of the carrier's present and post-installation coverage.

Verizon proposes to install twelve directional panel antennas – three CommScope Model NNH4-65A-R6, three Ericsson Model 6701, and six Ericsson Model 2208 – on the 90-foot stadium light pole sited next to the north end of the bleachers on the west side of the football field at St. Ignatius College Preparatory, located at 2001 37th Avenue. The antennas would employ up to 4° downtilt, would be mounted at effective heights of about 63, 45, and 50 feet above ground, respectively, and would be oriented in identical groups of four at about 120° spacing, to provide service in all directions. The maximum effective radiated power proposed by Verizon in
any direction is 18,545 watts, representing simultaneous operation at 193 watts for 28 GHz, 172 watts for CBRS, 5,250 watts for AWS, 5,130 watts for PCS, 4,170 watts for cellular, and 3,630 watts for 700 MHz service.

Verizon provided for review two coverage maps, attached for reference. The maps show Verizon's 4G LTE coverage in the area <u>before</u> and <u>after</u> the site is operational. Both maps show five signal levels of coverage, which Verizon colors and defines as follows:

| | |
|---|---|
| Green | better than -75 dBm |
| Yellow | -75 dBm to -85 dBm |
| Red | -85 dBm to -95 dBm |
| Grey | -95 dBm to -105 dBm |
| Black | worse than -105 dBm |


*e-mail:* **mail@h-e.com** **S9UJ**
*Delivery:* **470 Third Street West • Sonoma, California 95476**
*Telephone:* **707/996-5200 San Francisco • 707/996-5280 Fax • 202/396-5200 D.C.**

These service thresholds used by Verizon are in line with industry standards, similar to the thresholds used by other wireless service providers.

We conducted our own drive test, using an Ascom TEMS Pocket network diagnostic tool with built-in GPS, to measure the actual Verizon 4G LTE signal strength in the vicinity of the proposed site. Our fieldwork was conducted on April 6, 2020, between 9:50 AM and 11:40 AM, along a measurement route selected to cover all the streets within the map area that Verizon had indicated would receive improved service.

Based on the measurement data, we conclude that the Verizon 4G LTE coverage map showing the service area without the proposed installation includes areas of relatively weak signal levels in the carrier's present coverage. The map submitted to show the after coverage with the proposed base station in operation was reportedly prepared on the same basis as the map of the existing conditions and so is expected to accurately illustrate the improvements in coverage.

We appreciate the opportunity to be of service. Please let us know if any questions arise on this matter.

Sincerely yours,

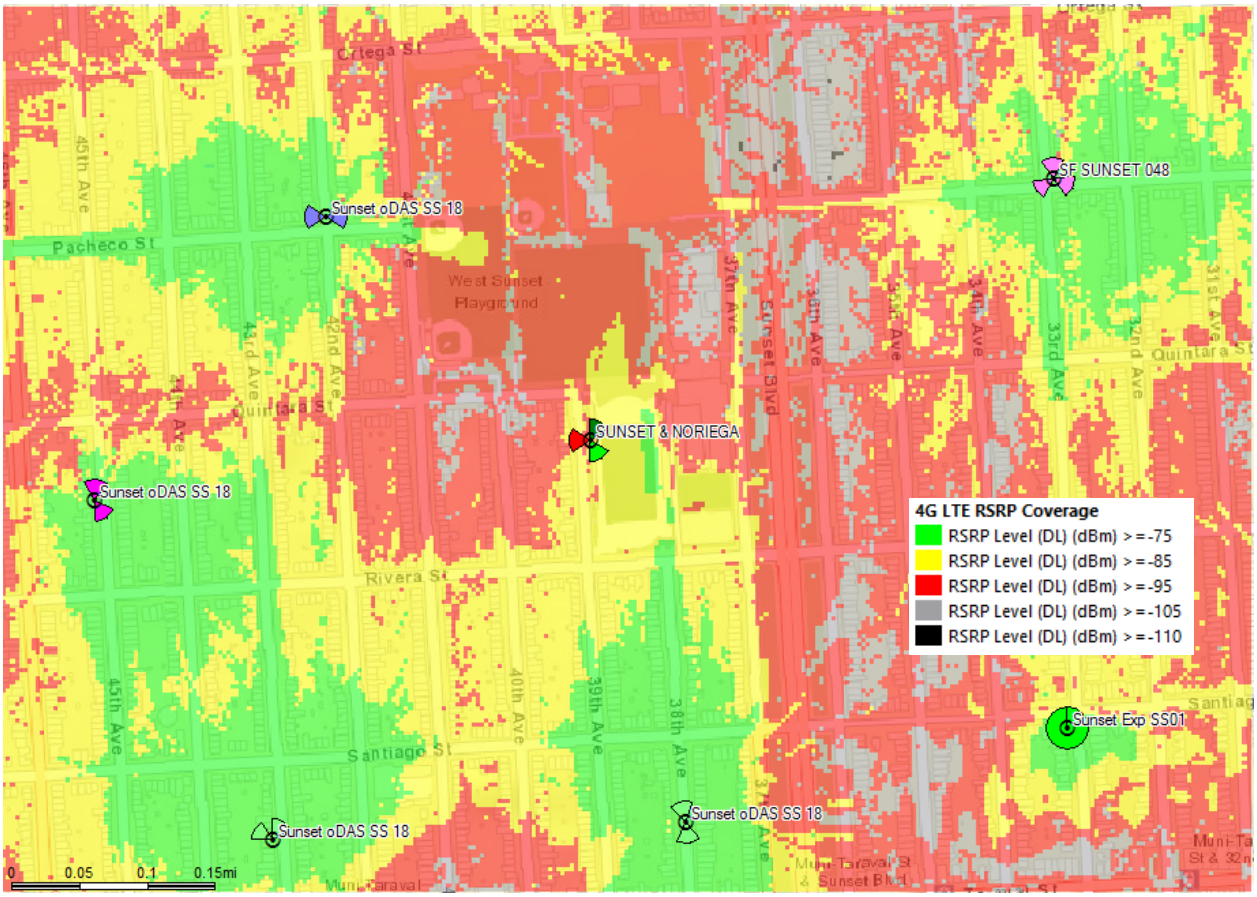
REGISTERED PROFESSIONAL ENGINEER
WILLIAM F. HAMMETT
E-13026
M-20676
Exp. 6-30-2021
ELECTRICAL
MECHANICAL
STATE OF CALIFORNIA

William F. Hammett, P.E.

Enclosures

scn

# Existing LTE Coverage




verizon

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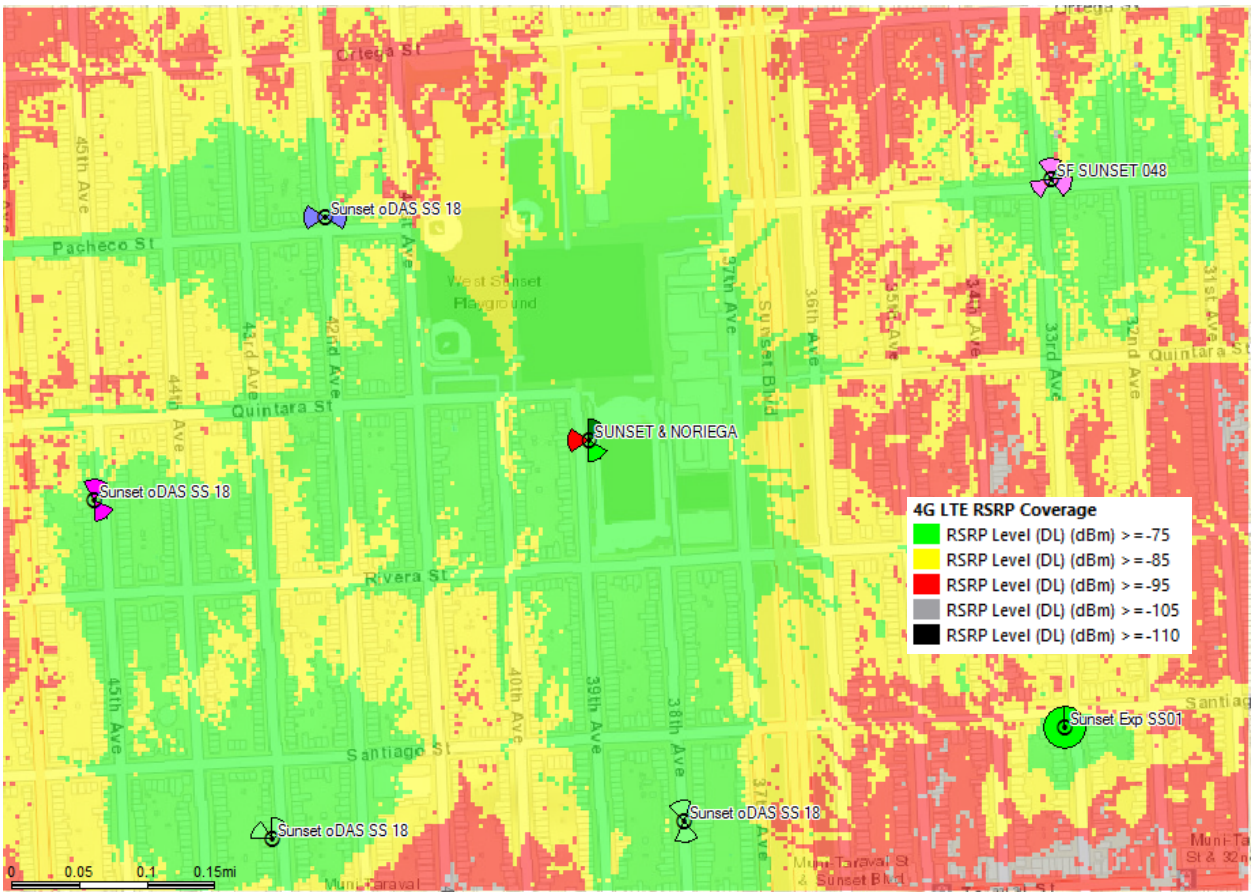
# Proposed LTE Coverage




verizon

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| | |
|---|---|
| **From:** | BOS Legislation, (BOS) |
| **To:** | mwgraf@aol.com; sisunsetneighbors@hotmail.com; Scott Emblidge; chad.christie@ridgecommunicate.com; kstupi@siprep.org |
| **Cc:** | Storrs, Bruce (DPW); Tse, Bernie (DPW); Rivera, Javier (DPW); Duran, Vanessa (DPW); Wong, Jason (DPW); PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Varat, Adam (CPC); Rodgers, AnMarie (CPC); Navarrete, Joy (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Omokaro, Ify (MTA); Horn, Jeffrey (CPC); Rosenberg, Julie (BOA); Sullivan, Katy (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS) |
| **Subject:** | APPELLANT SUPPLEMENTAL MATERIAL: Appeals of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue - Hearing - September 22, 2020 |
| **Date:** | Thursday, September 17, 2020 1:40:11 PM |
| **Attachments:** | image001.png |

Greetings,

The Office of the Clerk of the Board has received the following supplemental material from the Appellant, Saint Ignatius Neighborhood Association for the appeals of CEQA Exemption Determination and Conditional Use Authorization for the proposed project at 2001 37th Avenue.

Appellant Supplemental - CEQA and CU - September 17, 2020
Appellant Supplemental - Kera Lagios - CEQA - September 17, 2020
Appellant Supplemental - CHEE LLC - CEQA - September 17, 2020
Appellant Supplemental - CHEE LLC - CU - September 17, 2020
Appellant Supplemental - Commission Submittal 1 - CEQA & CU - September 17, 2020
Appellant Supplemental - Commission Submittal 2 - CEQA & CU - September 17, 2020
Appellant Supplemental - Commission Submittal 3 - CEQA & CU - September 17, 2020

I invite you to review the entire matter on our Legislative Research Center by following the links below:

Board of Supervisors File No. 200992
Board of Supervisors File No. 200996

Regards,

**Lisa Lew**
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org

**(VIRTUAL APPOINTMENTS)** To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.

*Due to the current COVID-19 health emergency and the Shelter in Place Order, the Office of the Clerk of the Board is working remotely while providing complete access to the legislative process and our services.*

Click here to complete a Board of Supervisors Customer Service Satisfaction form

The Legislative Research Center provides 24-hour access to Board of Supervisors legislation, and archived matters since August 1998.

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.*

SI Neighborhood Association

sisunsetneighbors@hotmail.com

September 17, 2020
TO: San Francisco Board of Supervisors

**RE: Appeal of Saint Ignatius Stadium Lighting Project, Planning Case Number 2018-012648CUA**

We are the Saint Ignatius Neighborhood Association -- made up of 165+ neighbors surrounding Saint Ignatius College Preparatory private school -- and we are strongly opposed to their proposed stadium lighting project located at 2001 37th Avenue in the Sunset District. We have additional support from the Sierra Club, D4Ward, and the Sunset Community Garden, among others.

As you will see from our CUA and CEQA appeal filings, expert testimonial letters, and the attached neighbor testimonials (from 2015 to the present) the Saint Ignatius Stadium Lighting Conditional Use Approval (CUA) does not meet a number of key planning code requirements and was exempted from necessary environmental reviews under CEQA. The Planning Commission has not adequately demonstrated how the proposed project actually satisfies the planning code or General Plan, nor how the project's environmental impacts would be negligible. Our consultants have determined that the project does not meet the purpose, spirit or intent of the planning code and General Plan, and that the project would bring lighting, noise, traffic and parking impacts that are much greater than the Commission and Saint Ignatius contend.

Saint Ignatius (S.I.) is planning to install permanent night time stadium lighting on their athletic field. These LED lights will rise 90 feet above the field which is directly adjacent to many of the surrounding homes. The light arrays on top of these light poles will be huge - about the size of 2 to 3 trash dumpsters next to each other -- and will rise above our neighborhood to be seen from as far away as Grand View Park. They will be grossly out of character and scale of the Sunset neighborhood. Please see images in Attachment 1.

These permanent stadium lights are proposed to be in use for <u>150 nights a year</u> until 9 pm and until 10 pm for large attendance sporting events.

In the past, S.I. has rented lighting for football games and the neighborhood (extending many blocks in radius) experienced the effects of night time games, namely increased traffic, cars speeding, blaring loud-speakers, cheering, air-horns, litter, absolutely no street parking, blocked driveways, double parking and pre/post gaming drinking and partying.

During these temporary lighted games, residents experience noise levels too loud to even have a conversation in their own homes -- even several blocks away from S.I. What would be normal conversations turn into shouting matches as we try to talk with our families Watching TV or having a quiet family dinner is out of the question during these nights. These impacts go far beyond the just the houses surrounding S.I. -- noise, lights and parking jams occur throughout a wide block radius -- from several blocks East of Sunset Blvd, down to 43rd Avenue as well as north and south, extending to Santiago and Pacheco Streets.

S.I. already has daytime and weekend games/practices that result in loudspeaker use, constant noise, parking and traffic issues. But this is to be expected when you live near a high school during school days and weekends, but not our evenings.

To our knowledge, S.I. would be the <u>only</u> high school in San Francisco with night time stadium lighting. Other SF private and public high schools (with much larger student bodies) have vibrant and healthy sports programs which are easily conducted during daylight hours or they use Kezar Stadium. As demonstrated by these other SF high schools without lighting, we question the real need for night time lighting at the school.

Earlier this year when SINA spoke with S.I. representatives about this lighting project, they stated that the night lighting is a marketing tool to enhance their athletic standing and will be used to attract potential student athletes to their school. They went on to explain that they must actively compete for exceptional student athletes to attend their exclusive private school.

S.I. has also maintained that their “new” co-ed sports activities require practices at night and thus the lights. In actuality, SI has been co-ed since 1989 and, if they have been in compliance with Title IX, this should not be a problem for either the school or the students. All other city high schools are able to schedule practices for all their students without needing permanent lights on until 9 pm.

As one of our neighbors, a high school educator asks -- what about the SI students? After a full day of school, they will now have sports practices until 9 pm. When will they finally get home, do their homework, or get some sleep? In the past, S.I. has dealt with serious issues

surrounding their students being pushed too hard. We question why the school is proposing to install permanent stadium lights and scheduling mandatory sports practices until 9 pm practically every school night. We all believe that sports are a healthy and necessary part of high school education -- but not until 9 pm. Further, as you will see in our submittal materials, the adverse effects of night time lights on teens brains is well documented.

Importantly, Saint Ignatius is an exclusive private school, with very few students coming from the Sunset neighborhood. The majority of their students actually come from outside San Francisco. The campus is closed to the public and the installation of the lights will only benefit the school -- to the permanent detriment of the neighbors' quiet evenings at home.

Saint Ignatius has historically been a good neighbor and we are accustomed to their day time sports events during school days and weekends. Saint Ignatius is a powerful and prestigious institution in San Francisco and many long-time residents in our association, while adamantly opposed to the stadium lights, are reluctant to submit letters of protest for fear of the school's repercussions. In the past, when some neighbors called S.I. Security to have students move their cars from blocking a driveway, or complained directly to S.I. about their leaving litter in their front yards -- neighbors found graffiti on their garage doors, eggs thrown at their homes, and in a couple of cases trash/dog feces put through their mailboxes. While these cases are not common, they leave a lasting negative impression on our neighbors.

The installation of permanent stadium lighting at S.I. would be extremely disruptive to our evening residential living. As you have read in our appeal, this CUA flies in the face of the SF General Plan guidelines, most importantly: 1) to protect residential areas from the noise, pollution and physical danger of excessive traffic, and 2) to protect the livability and character of residential properties (Urban Design Element Policies 4.1 and 4.15).

These stadium lights, and their extended use virtually every weeknight during late fall, winter, and early spring, will substantially impair and impede the reasonable use and enjoyment of our homes and our quiet residential Sunset neighborhood. We have young children who need early bedtimes, we want to enjoy quiet dinners with our families, we want to be able to park in our own driveways after work, and we want our friends and family to be able to find parking near our homes.

Our neighborhood association is not asking anything that any other school area neighborhood currently enjoys -- the ability to reside in a peaceful residential zoned neighborhood with quiet evenings.

This is not hyperbole; attached are neighbor letters dating back to 2015, documenting the past repercussions of night time S.I. games, the lit practice field usage, and even excessive day time loudspeaker noise at practices.

If these lights are installed, anything goes, and while SF Planning issued a final motion with certain usage conditions and S.I. has developed a (flawed) Large Event Management Plan, there is really no enforcement mechanism. It will be up to the neighbors to monitor the usage of these lights and the associated traffic, parking, and nuisance issues, and to report on any violations.

The Planning Department and the Commission have not addressed any of the points raised by neighbors in their many letters, in SINA's submittals for the Commission hearing, in the draft and final Motions, or in the appeal response memorandum. They continue to assert the project benefits without considering any of the many valid neighbor concerns.

We strongly urge the Board of Supervisors to overturn the Commission's approval of this project as it is not necessary or desirable for the neighborhood, and the adverse impacts to our neighborhood's livability far outweigh the benefits to the school that the project might bring. At the very least, the Board should be able to recognize that Saint Ignatius must do a great deal more work to demonstrate that the project will not create the impacts that we reasonably expect, and to make the project an acceptable new use of the school campus.

Sincerely,

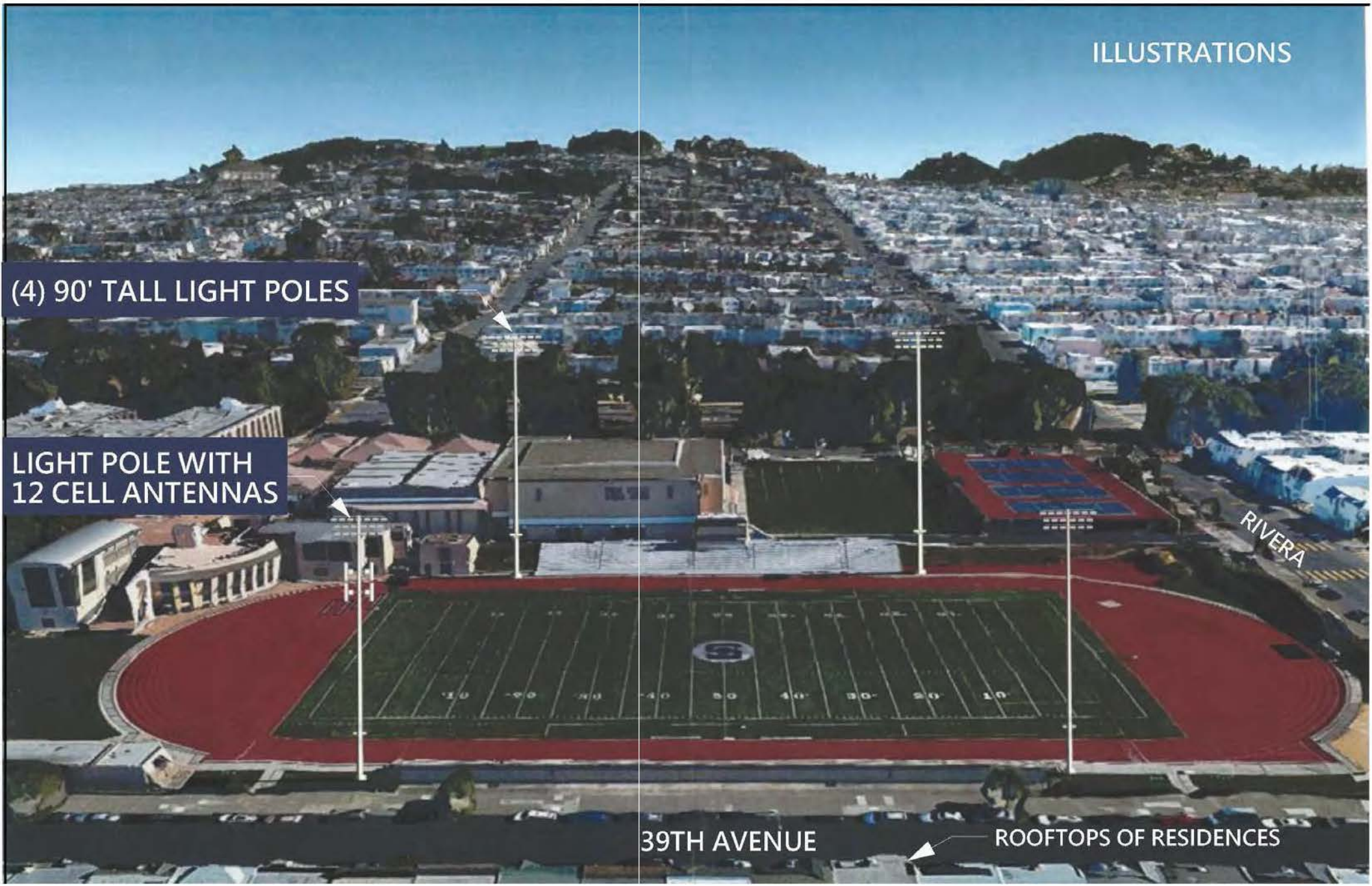
Deborah Brown, Secretary

SI Neighborhood Association

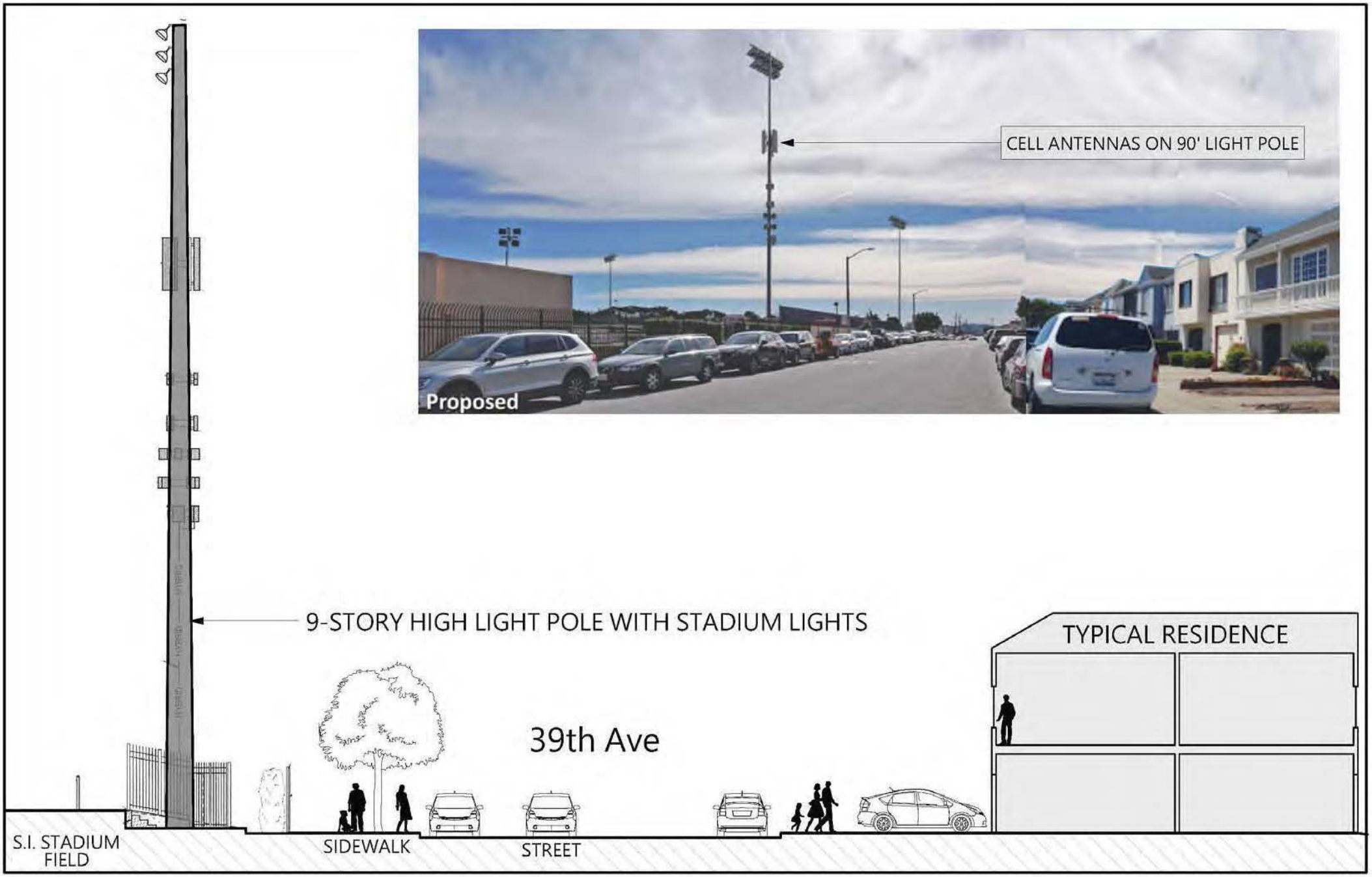
Attachment 1: Visual Renditions of Light Towers
Attachment 2: Neighbor Past Experience Testimonials, 2020
Attachment 3: Neighbor Planning Commission Opposition Letters, 2020
Attachment 4: Neighbor Opposition Letters to District 4 Supervisor, 2015
Attachment 5: SINA Online Petition Opposition Comments, 2020

# ATTACHMENT 1

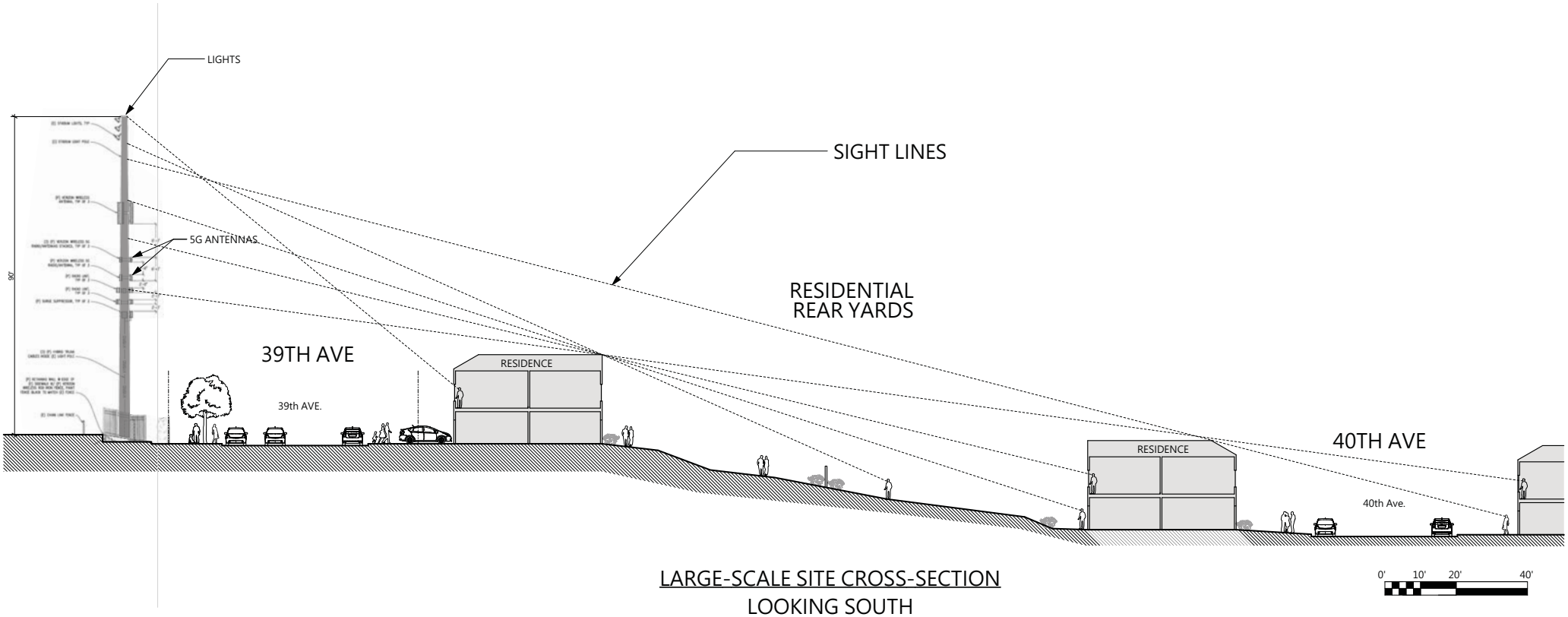
# VISUAL RENDITIONS OF LIGHT TOWERS


ILLUSTRATIONS
(4) 90' TALL LIGHT POLES
LIGHT POLE WITH
12 CELL ANTENNAS
RIVERA
39TH AVENUE
ROOFTOPS OF RESIDENCES

CELL ANTENNAS ON 90' LIGHT POLE
Proposed


9-STORY HIGH LIGHT POLE WITH STADIUM LIGHTS
TYPICAL RESIDENCE
39th Ave
S.I. STADIUM FIELD
SIDEWALK
STREET

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




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

## 39TH & 40TH AVENUE VIEW

# ATTACHMENT 2

# NEIGHBOR PAST EXPERIENCE TESTIMONIALS
# 2020

**From:** Peter Koch <kochsf@att.net>
**Sent:** Thursday, September 3, 2020 8:46 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Your Past Experiences with SI night games

Hi Deborah, this is Peter & Sandy Koch at 2825 Rivera St. S.F.

We Have lived across from Saint Ignatius for almost 30 years. During those Friday night football games that SI put on with temporary Lighting, it was extremely disruptive. Our biggest complaint was the noise.

From about 7PM to 10 O'clock we couldn't even be in our living room, the noise was so loud.

We had cars parked in our driveway and litter all over the street.

We have always , over the years , been good neighbors with SI when they went through various building projects ( Art Center , Swimming complex, Tennis courts, etc.). But this new project of lights and Friday night football games is unacceptable.

My wife and I tolerated those the Friday night games because we thought they were a one-time event, but the disruption on an ongoing basis is frightening. The parking was dangerous if we had to get out of our garage in an emergency. My wife was scared with all the teenage camaraderie going on after the game, which I witnessed a lot of drinking. This quiet neighborhood cannot absorb 2,000 or more fans.
I am not comfortable in my own house during those football night games.

Thanks Peter & Sandy Koch

---

**From:** Tiffany Pavon <tiffany@tiffanypavon.com>
**Sent:** Tuesday, September 1, 2020 5:14 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Your Past Experiences with SI night games

Hi SISunsetNeighbors-

Night lights----

We live directly across the street from Saint Ignatius on 39th Ave.

When there are night games, we are unable to use our living room or use our front bedroom. The lights shine into our home even with the shades shut, I'm not talking street lights it is like daylight but harsher. Then there is the noise from the loudspeaker, cheering, music, and people milling about, we cannot even watch tv or have a conversation in our own home. We have the right to quiet enjoyment in our homes and these games are very disruptive for all of us.

Then add in all the traffic, double parking, blocked driveways, people hanging out in front of our house before and after games. There have been countless times that

we are unable to get in and out of our driveway due to it being blocked. We have had people yell and become combative when we ask them to move their cars so we can get in and out of our own driveway. The school staff sees this yet has failed to act even after we as neighbors have asked for help addressing these issues. With adding night games these issues will become worse.

SI has been able to have their sports programs work together to use the field without adding lights for many years. Why do they need to do this when it creates so much disruption and chaos in a residential neighborhood? We also have children that are in school and need to be able to go to sleep at their bedtime and can not with the bright lights glowing in their window, noise blaring.

I have attached an audio file with how loud the loudspeakers were during a daytime practice last month. This was just a day time practice without cheering, music, noisemakers, etc.

Tiffany

---

**From:** Coral Ho <coral_ho@hotmail.com>
**Sent:** Monday, August 31, 2020 10:51 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Your Past Experiences with SI night games

Hi Deborah,

Here are what I experienced withe the rented light game day before. I have lived in this neighborhood for 20 years and I was affected by the game every time. I don't remember when SI have the game but I did remember all the bad experience from the game night.
Since my bedroom is facing the SI football field, the light was so bright that was affecting my little kids to get to sleep.

Also, lots of people were screaming and yelling during the game, it created lots of noise.
In addition, lots of car park around the neighborhood during game day. The SI student already generate lots of car parking occupy problem in our neighborhood, with the game, it gets worst. I just experienced it today that an SI student parked her car in front of my house since yesterday (Sunday) and then she moved her care today when I got home from work at 5:30pm. If there is game, she may not moved her care until later of the day.

Hope my writing can help.

Coral

---

**From:** Christine Crosby <christine.crosby10@gmail.com>
**Sent:** Friday, August 28, 2020 12:07 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Update & an Important Request

Hello,
My name is Dr Crosby and I reside at 2186 36th Ave, across the street from SI. In the past few years, temporary lighted night games have resulted in blinding light through our living room windows, making it difficult to rest and have story time before bed. When the practice field is rented to club sports, which are expensive, exclusive sports league, the lights are often left on past their permitted time and shine directly into homes and bedrooms on 36th Ave.

My driveway is often blocked on both sides, preventing us from even using the curb or sidewalk to access our driveway and garage. Parking blocks away when returning from work/school/grocery stores means we have to schlep our belongings and child home rather than park in the driveway or garage which we have every reasonable expectation of being able to use. It also means that visiting guests have nowhere to park conveniently. This includes our senior citizen family members, many of which have mobility issues. When a certain relative visits, her knee prevents her from walking long distances. Many times, she's unable to access the driveway spot we "save" for her when she's expected. She double-parks in front of our home while coming inside and my husband drives her car to find a spot and then returns, wasting valuable family time, when we should be able to use our driveway for the vehicle.

Parents and students alike give us the "finger" when we inform them that they are parked illegally, blocking our access to our residence, and ask them to find a more appropriate space. While we sometimes ticket/tow, we fear that these inconsiderate "neighbors" will retaliate and damage our home, or worse injure our family. Due to their behavior, we have no reason to give them any further benefit of a doubt. We resorted to paying almost $500 to the SFMTA to paint our curb tips red, but this also does little to discourage illegal parking and our driveway is blocked frequently regardless.

The litter left behind from normal school days is quite annoying, but after games, the discarded alcohol containers and other trash is disturbing. The broken glass is a hazard to pedestrians and bike tires, especially children using balance bikes. There's no effort made by SI to mitigate these problems and when the school is called to inform them of a mess clearly left by a student (signed homework) they respond by asking "Why are you calling us? Just clean it up". We would appreciate that the offending student be asked to apologize to the neighbors they littered on. That's what I would do with my child, should he be so inconsiderate. We frequently observe track and other SI athletes using the green space as their personal bathroom. This is really exemplary of how the SI community feels about the Sunset district in general. We all have a responsibility to teach children in our charge right from wrong, something a religious school ought to take more seriously.

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**From:** Anne Marie Benfatto <annemarie2@comcast.net>
**Sent:** Friday, August 28, 2020 7:57 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Update & an Important Request

Hi Deborah,

Attached please find a letter about the impact of day and night games on the neighborhood. Thanks for collecting all of this info and working so hard on this.

Thanks so much,
Anne Marie

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**From:** Josette Goedert <josette.goedert@gmail.com>
**Sent:** Friday, August 28, 2020 11:12 AM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Update & an Important Request

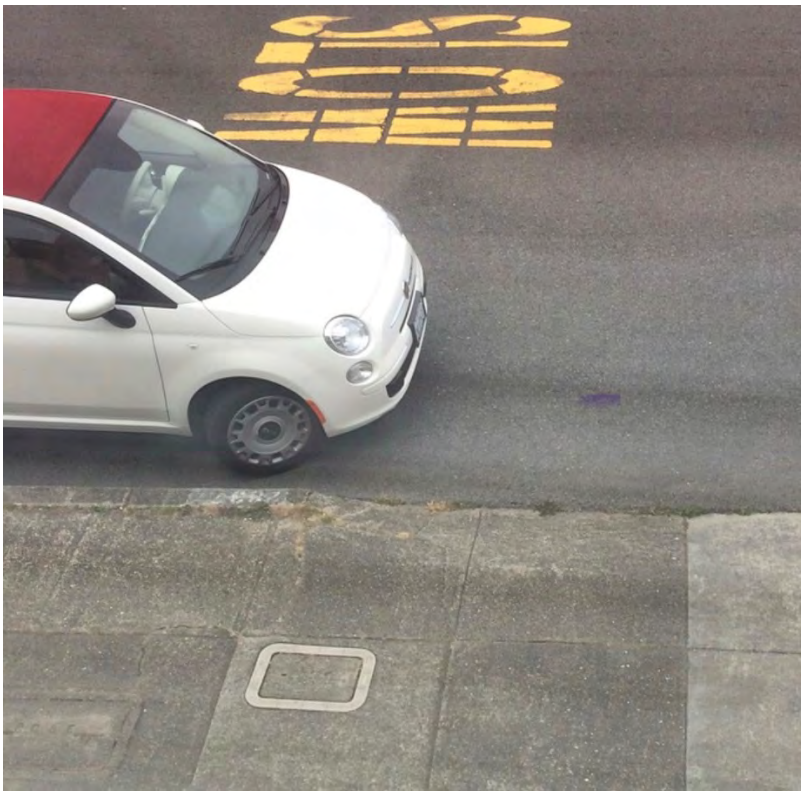
Hi Deborah,

We have lived directly across from Saint Ignatius for 8 years now (39th and Rivera) and their level of consideration has gone significantly down. At first we were able to come home and enjoy our home on the weekends or evenings, but now it's almost out of question. Every single weekend they either have a game or have rented out their fields to external organizations such as pee-wee football, lacrosse, soccer, frisbee golf, all day activities or sports camps, etc. If we need to leave the house we know that we will not get parking anywhere near our home or have any peace and quiet. The events start early in the morning (sometimes blowing whistles as early as 6:45 AM on a Saturday) to not ending until way past 4 or 5 PM in the evening. This goes on almost every weekend. Saint Ignatius also starts some practices Monday through Friday with whistles blowing again as early as 6:45 AM.

We've had our driveway blocked so many times that we have resorted to calling SFMTA to issue tickets because we have no other choice. I personally have had SI parents blatantly ask me if I was going anywhere "anytime soon", so that they could illegally block my driveway because they were late for an event at the school and they couldn't find close parking. I had to let those parents know that if they remained parked in my driveway that I would tow them and that it didn't matter if I had anywhere to go - I need access to my car in the garage. I have called the school several times to get their students to move their cars out of my driveway or out of my neighbors driveway.

Anytime I have politely asked a student to move their vehicle 9 times out of 10 they have argued with me and then I tell them that they can get their car out of the impound if they park there. They then move their vehicles out of my driveway. I have included a photo of their student's vehicle in my driveway from May 5th, 2015. I called the school and SFMTA - the student arrived just before SFMTA did and moved their vehicle. I was significantly late for a meeting that day due to their student parking in my driveway and I told the SI office that, but they didn't seem to care, but only offered the rebuttal of "the student's know the rules and we had them move their vehicle."

On weekends it's almost worse because the people who come from outside the city never obey the red on the driveway. We had a pickup truck park in between my driveway and our neighbors (mind you a Prius can fit there, but nothing bigger). I then had to argue with the driver to move his truck and he told me that he was late for his son's football game and I had to let him know that his truck would be in the impound if he didn't move it. Almost every weekend I have to let someone know to not park in my driveway. The last time I called SFMTA was last November on a weekend and the driver argued with SFMTA for giving them a ticket.



When Saint Ignatius had their temporary lights up last year they were shining directly into our home. We could turn the lights off in our house and have it still be illuminated brightly. SI did not turn the lights off when they were supposed to and sometimes they stayed on for at least another hour after they were supposed to be turned off. This would be as late as 10 PM some nights. The level of consistent noise from the loud speaker is blaring. I have included a video from their practice on June 15th at 4:05 PM. This is a small example of how loud it is, but please note it's much louder for games and for all day weekend events and games.

Overall, SI isn't a good neighbor and now that we have a 1 year old daughter - I would like to be able to keep her naptime and bedtime routine without consistent noise, crowds, loud speakers and bright lights. Saint Ignatius has not taken into consideration how this will affect the small children in the community when the lights won't go off until late shining directly into their bedrooms. Having the lights be used for up to 200 nights per year is absolutely ludicrous and in the end potentially causes our child's nighttime routine to be drastically changed. They have not taken into consideration how the small children in the neighborhood would be affected by their NON-ESSENTIAL 90 foot lights. The yes vote has shown our community that the city favors Saint Ignatius and their students that pay an exorbitant amount of tuition for a project that doesn't directly affect their education, but negatively

affects the Outer Sunset. The Saint Ignatius students and parents do not have to live with these lights and 5G technology across from their homes. They will drive home, which is mostly outside of San Francisco city limits.

It remains beneficial to preserve the family oriented environment that has been developing over the years for young families here in the Outer Sunset. I cannot in good conscience find anything positive with their proposal for 90 foot lights, up to 200 nights a year field usage and 5G technology. Saint Ignatius likes to tout themselves as good neighbors, but they are anything but that.

Best,

Josette

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**From:** village attab <villageattab@yahoo.com>
**Sent:** Monday, August 24, 2020 8:45 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Update & an Important Request

We live on 2450 38th ave. few times we experienced loud noises from games. I thought that it came from Vicente and 42nd ave. I went out to discover that the loud noise came from St. Ignatius High School. I walked toward there and the louder it became. The game was just ending. So many people were idling around continuing the fiesta outside of the stadium, some were drinking, some were smoking, and others just loud and loud disrespectful of the neighbors. The whole area matter of fact looked out of control. I thought to myself how could a school treat its neighbors this way? The light were vivid, cars everywhere and many were just honking and oblivious of the neighborhood's children who must rest and go to bed.
Unfortunately I didn't record the time or took any photos. I just went on a fact finding mission. I was about to tell the police but I didn't. That day disgusted me of that school and never wish that decent people would send their children there.

Nafiss Griffis

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**From:** carole gilbert <carolegilbert@comcast.net>
**Sent:** Friday, August 28, 2020 9:54 AM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Update & an Important Request

My name is: Carole Gilbert.
I live at: 2179 40th Ave
SF CA 94116

I have lived here since 1984, 36 years. In that time I have watched St Ignatius high school expand both physically and with the student body population.

In recent years we have had a lot of trouble with students and parents blocking the driveway. I've had vehicles ticketed and now have turned to having them towed due to the seemingly lack of consideration for our neighborhood.

During the night and weekend games we typically have parents and students double parking on 39th Ave. and Rivera St. Due to double parking, the 48 Quintara bus is not able to turn on 39th Avenue, It is forced to change its route and come down 40th Avenue. The police do not seem to be monitoring this situation I have seen motorcycle police just watching the games but not monitoring the issues mentioned above.

The temporary lighting that SI tested out lit up the sky. It looked like daylight was coming in our windows that face the SI field. We always can hear the loud speakers blaring, and the crowds cheering.. This is extremely disruptive and once SI increases their night time events to150 + events per year it will be impossible to relax in my home in the evening. The games/practices will be until 10 PM during week nights and weekends. The crowds that leave will linger walking to their cars, making noise, tossing liter and racing up our streets. Why students need to play games and practice until 10 PM when they should be home doing homework and sleeping is beyond me.

The public San Francisco high schools do not have night games at their schools. When this occurs, they play at Kezar Stadium they don't disturb their neighbors. Why can't SI do this?

I find this behavior a detriment to our ability to enjoy our quiet home life. Noise, double parking, trash, people hanging out are not acceptable to me.

Please reconsider their petition for this lighting project. Do not allow them to disrupt our neighborhood. I know if you lived in our neighborhood you would not want this to move forward.

Thank you,
Carole Gilbert

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**From:** timothy brey <timuna@gmail.com>
**Sent:** Friday, August 28, 2020 10:37 AM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Update & an Important Request

To Whom It May Concern,

My husband and I live on Rivera St directly across from Saint Ignatius' football field end zone. Student athletes normally stay until about 7 pm during the school year. They all seem to have cars and park them throughout the neighborhood. While not always convenient, this has been manageable. Now SI wants to start school later and with the addition of permanent lights have student athletes here until 9 or 10 pm. They also will have big games here (football, and to an extent soccer and lacrosse) which will bring crowds of 2,000 people or more. They normally have their football games on Saturdays all day, which impacts the neighborhood in a negative way due to the impact of increased car traffic and parking issues (parking in people's driveways and taking any and all parking spaces for at least four blocks in every direction). Having lights on for most of the night and having crowds with major traffic, parking, and noise issues is not taking the needs of the neighborhood into consideration.

During the planning commission meeting, the SI principal told the commission that game attendance would not exceed 1,000 people. Either she was intentionally deceiving the commission or has not read SI's own material which they sent out to their neighbors. According to their own printed mailer, they have at least 8 games scheduled which they deem high attendance: having up to 2,000 people. I know for sure that when they play Sacred Heart or Serra high schools, attendance will be over 2,000 people as

those are big rivalries and bring out a lot of people, many who do not even have current family members attending SI.

Also, SI promised (at the planning commission meeting) to dim the lights at 8:30. I don't see how they can make that promise as that would entail dimming the lights in the middle of a football (or other sport) game. We as neighbors have no way to hold them accountable.

The planning commission only seemed to consider what was best for SI and its students. The neighbors and neighborhood and the public interest didn't seem to merit much concern or consideration. That's not right and seems in direct conflict with the mission of a public agency such as the planning commission.

Playing high school sports should not create such an imposition on the neighborhood and have so many negative consequences for those of us who live here.

Attached are two photos taken when they had temporary lights up for evening practices.

They had them up for a couple of months. These lights were very bright. Many times they left the lights on after students had left the field. Often they had a loudspeaker on during practices giving students directions/commands as part of their training. We could hear it with our windows closed. Does that kind of behavior sound like a good/considerate neighbor to you?

Sincerely,
Una Fitzsimons and Tim Brey

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**From:** Joy Chan <joychan327@gmail.com>
**Sent:** Sunday, September 13, 2020 12:47 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Your Past Experiences with SI night games

Hi Deborah,

Here is our past experience, sorry it may not be a short description. You can extract what you need. I am going to write the email to Board of Supervisor next, with some of the similar comments.

I want to share our family experiences with the SI's night sports activities in the past several years we live here.

First of all, we live directly across from the SI sport field on Rivera St between 38th and 39th Ave. We already foresee this project of installing new 90' tall lights will have adverse effects on our family and house, which we worked so hard to build over the years. Over the last few years of living here, we have to tolerate 1) difficult parking during school days, 2) difficult parking during the early evening and weekends when they have games, 3) cars blocking our driveway all the time (the curb side outside our house can only fit a small car,

so when someone try to park a larger car, it will block our driveway by a foot or so), 4) double parking all the time at the block on Rivera St between 37th and 38th Ave making driving and crossing streets with my kids very unsafe. Not to mention all the noise and littering problems outside our home, we have to constantly pick up the emptied snack bags that were left on our sidewalk (I know I cannot prove these were from the SI students but I am sure at least some were from them).

To make matters worse, I remembered earlier this year in February, SI rented a few temporary lights for their night practice, this was the worse nightmare we had. When we got home in the evenings, the lights shined straight into our house, from our living room all the way to our master bedroom at the very back of our house, the whole house was flooded with lights. To give you some context, I measured on Google map, from where the lights were placed, they shined about 500' from the north side of the field all the way across the block and then through my house which is 63' long, approximately 600' of array of lights. My kids said the lights hurt their eyes and we had to close off our curtains for days until the Daylight Saving kicked in and SI did not have to use the lights anymore. I had called SI and talked to Tom (Director of Communication) and John (Director of Athletics), they tried to address the issue but it did not help.

Our concern is with the new 90' tall lights, although it claims this is newer technology that will minimize lights shining onto the neighbors, who can guarantee it will not be as bad as the lights we experienced earlier this year? Once the lights are installed, that is it, the matter is settled, we have no way to complain. Also, even though these new lights may not shine horizontal directly onto the neighbors, the glow of the lights and multiplying by the glare effect from the fog, I do not think the light pollution will be a non-issue.

I urge the City officials and Board of Supervisors to listen to the neighbors, this light project is really pushing forward to the advantage of SI only but at the expense of the neighbors. There are many alternatives they can do to continue promoting their strong athletic programs and having night practice is not the only option. Can they better schedule their class time? Shift some of the practice to during the day and other classes in the evening if the students are to stay longer hours at school anyway? On the other end though, we have no options, this is a neighborhood we live in, family and house we worked hard to raise and build. To not get impacted, does it mean we can only move to elsewhere?

Best,

Joy

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**From:** DM Little <florence723@yahoo.com>
**Sent:** Monday, August 31, 2020 2:13 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Your Past Experiences with SI night games

Deborah - our family list is attached - Denise Malmquist-Little, Malmquist Family Trust

MALMQUIST FAMILY TRUST
Denise Malmquist-Little Trustee
Trustee holds full Power of Attorney for all matters pertaining to
3031 Quintara St. SF CA 94116 AND Marie J. Malmquist
CONTACT: 415-665-4746 florence723@yahoo.com

September, 2020

**LIST OF EXPERIENCES DURING AND FOLLOWING NIGHT GAMES/EVENTS HELD AT ST. IGNATIUS COLLEGE PREPARATORY affecting our home and our block (Quintara between 39th/40th Avenues):**

*First, we apologize for having no pictures or formal documentation. We never thought such would be necessary. We have shared all this with SI in the past and were told they would look into it. The only improvement we have seen was the PA system doesn't carry as clearly as far as 30th Ave anymore.*

•Urination – almost every night field event for the last 5 years has found our doorway (we don't have a gate) being used as a restroom. The smell is horrible, and clean-up disgusting. It has also sometimes occurred after late events such as dances or theater events.

•Cigarette butts – butts are flipped out of moving cars towards our home … our home has wood/flammable siding. Burning butts, smoldering butts, and cold butts are left in our doorway, on our driveway, and in what used to be our front yard (presently being prepped for new landscaping). We used to have a large pine tree in front and sometimes cigarettes were ground out into the bark.

•Food & food wrappers – are tossed with no regard to proper disposal. They land in front of the house, in the doorway, in the old plants, and the ultimate was when the wind carried the trash up onto our roof!

•people in our doorway – street lighting has improved, but it is still dark in our doorway when our porchlight is off. From the dark, we hear the voices of groups hanging in our doorway; language is often crude. Trash is left behind. Smoke comes up into the house – cigarette and marijuana. We would have to get up out of bed and turn on the porch light to get them to leave, and sometimes they wouldn't…

•Drug dealing – SI security knows about these guys. They park on the Q street hill and have police scanners in their cars. They host folks to sit in the car and smoke weed. Some kids/young adults stop and make a purchase and leave; they even do drive-up window-to-window. SI security has worked with our neighborhood and SFPD to clear the area of such dealers. If there weren't buyers coming to evening and night events, there wouldn't be dealers.

•Blocked driveway – Mom is 90 years old. If we have a late appointment, parking is all taken up and sometimes I cannot even get into the driveway to take her in. I have to double park and try and get her into the house safely. Same thing happens if I take her out to eat dinner. Depending on the time of year, it has been dark and more dangerous trying to get her safely into the house. This is also a problem during the regular school day, but SI security is more help in finding student drivers and having them move their cars to not block the driveway. At evening/night events, SI doesn't have that ability.

•Noise – The loud speakers are very loud. The crowds are very loud. During night field events, we cannot have a conversation in the house without shouting. The TV has to be turned up to a high level to be

heard. We cannot use our deck because the noise is worse outside. SI did adjust their volume once they learned the play-by-play could be clearly heard and understood all the way up past 30th Avenue, but it is still super loud right next to the field.

•Dangerous driving – When hyped up at events, teen judgment takes a backseat. We have witnessed drag racing up our hill, kids on top of moving cars, items flying out of moving cars (balls, trash, clothing), kids standing in cars out of moon roofs, and kids hanging on to car windows while standing outside and the car is moving.

•Adults – whether evening practices or full blown events/games, adults double park, leave engines running, and talk loudly before, during, and after the event. They make driving on the hill dangerous because corners are blind and cars are going two ways in one way worth of street space.

•After parties – often people don't leave once SI locks their gates. Groups congregate in the Quintara Street parking lot, in the baseball field & seating, and in the soccer fields for drinking and partying. This is disturbing and unsafe. They are often even out on the street standing around their cars, leaving beer cans behind.

*The submission is compiled from the combined memories of the Malmquist Family over the last 5+ years.*
*Submission composition: Denise Malmquist-Little, Head Trustee.*

# ATTACHMENT 3

# NEIGHBOR PLANNING COMMISSION OPPOSITION LETTERS 2020

2179 40th Avenue
San Francisco, CA 94116
August 28, 2020

SF Planning Commission

Dear SF Planning Commission:

I am writing to ask you to reconsider your approval of Saint Ignatius High School's plan to install lights for nighttime activities.

I have lived in my home for the last 36 years. When I first moved in, the impact of SI was not felt on our neighborhood. Over the years, they have expanded their physical footprint as well as the size of their student body. It seems that over the years, the students, parents and administration have had less respect and less regard for our neighborhood. Their Good Neighbor Initiative has had little impact on the behavior of the SI community.

Street parking has been an issue for years. I cannot count the number of times that my driveway has been blocked. One morning I told a student that he was blocking my driveway. He said that he was late for school, that he didn't have time to move his car and just walked away. Not only is this a problem in the daytime, but it is also a problem when SI hosts night games. Students, parents and spectators double park and block our driveways with no regard for the inconvenience they have caused to the people living in the neighborhood. With SI's proposal to host more than 150 nighttime activities a year, this will be a problem day and night, many days a year.

Noise is also a big problem during their outdoor activities. The loudspeaker, the horns, the whistles and the crowds can easily be heard in my home. It is not possible to have a quiet conversation in my own living room. If this were happening many nights a year until 9PM or 10PM, this is totally unacceptable. Often at the end of the games, people going to their cars have been very noisy and sometimes very disruptive. They leave trash in the streets or in our yards. I have seen students driving recklessly, speeding and running stop signs.

Another new issue that I have noticed this summer is that the SI students who are participating in sports are often not respecting social distancing and not wearing masks. When I have passed them on the street while they are training, I have politely reminded them that they should be wearing the masks that they are carrying in their hands. Responses have been things like, I don't have to wear a mask I am outside or I don't have to wear a mask because I am running. If the school is not enforcing proper safety for its students, how can we be assured that they will be enforcing proper behavior during daytime or nighttime events? If the students, parents and spectators are not going to observe recognized Covid protocols, they are endangering each other as well as the people who live in our neighborhood.

The fact that SI is located in a residential neighborhood is a unique situation. It is not the norm in San Francisco to have multiple blocks of residences within a couple of hundred feet of high-use school sports fields. No other high school in San Francisco has night games at their home fields. It is an unreasonable expectation for SI to expect their neighbors to give up their peace and quiet **in their own homes** so that their students can play sports at night. They are not acting as good neighbors, but as an institution that has no regard for the good of the community.

Sincerely,
Anne Marie Benfatto

From: **Christine Crosby** <christine.crosby10@gmail.com>
Date: Fri, May 1, 2020, 3:07 PM
Subject: Letter to Protest Application at 2001 37th Ave, SI Lighting Project
To: <jeffrey.horn@sfgov.org>, <corey.teague@sfgov.org>, <rich.hillis@sfgov.org>, <delvin.washington@sfgov.org>
Cc: sisunset neighbors <sisunsetneighbors@hotmail.com>

Dear Supervisor Mar and SF Planning,

My name is Christine Crosby and I reside with my husband and young son at 2186 36th Ave, right across from St. Ignatius College Preparatory. When we purchased our forever home, I was thrilled to be so close to our great public schools and the green space of Sunset Boulevard. My husband was humored to be moving next to his alma mater, S.I., which he attended about 20 years ago.

We are now so disappointed to learn that S.I.'s "good neighbor pledge" does not include maintaining the peace and quiet of our neighborhood. This holiday season, it's very possible that the brightest thing in our living room will be the glare from new stadium lights, not our Christmas tree lights. The loudest thing in our living room won't be my husband teaching our son carols on the same piano that he learned to play on as a child; it will be the ruckus of visitors leaving night games, practices and events. The problems of students and visitors using the Sunset green space to relieve themselves (I have videos) will only intensify, as will the discarded coffee cups, take out containers, and other debris, currently at an all time low with school out.

Aside from spoiled special occasions, our daily life will be altered by later bedtimes than are recommended by the American Academy of Pediatrics. An 8 PM bedtime will be nearly impossible with the disruptions to our neighborhood. Proper circadian rhythms are essential to good physical and mental health. This is true not only for humans like my son, but for nearly all species. There are many genes conserved across species involved in using daylight to regulate the body's clock, signifying its biological importance.

Unfortunately, there has been no EIR or CEQA presented to the community for review. This is due to a "No New Use" claim on the proposal application. *This claim is utterly false and should not be accepted by City Planning*. In 2020, we must look forward and not backward. We must have a look at how this project will affect our environment as a whole. It is no longer acceptable to sacrifice our environment tomorrow for our convenience today. My son and all future generations deserve better than that.

During this global pandemic, there is time for the applicants to make concessions if they are no longer willing to abide by the terms of their original "Conditional Use" permit. They can submit an environmental impact study to ensure the appropriateness of this project. Should it be deemed appropriate, they can add local community service hours to their student's graduation requirements that would provide clean-up after events. They can clarify how many nights this will be used until 10 PM, and limit it to no more than 30. They can include the community in true engagement during which we are unmuted. There are any number of ways we could work together, if the City will give us the extra time to do so.

I ask that you please assist us by delaying this upcoming Public Hearing until the community can have a real Neighborhood Meeting with SI and Verizon and our voices can be *heard*, not muted. I ask that you please delay this hearing until there is more information on how this will impact the quality of our environment. This is a very important issue that impacts our community in an enormous way and will for decades to come. History will not look kindly upon a hasty decision in this uncertain time. Right now, you have the opportunity to do good for your community, I hope you take it. Thank you for your consideration. Stay well and healthy during this unsettling time.

Best,

Christine Crosby, Ph.D

Opposition to SI Lighting Proposal during SIP

Christine Crosby <christine.crosby10@gmail.com>

Dear Jeffrey and Delvin,
I hope you and yours are well during these increasingly trying times. I am writing today to express my dismay at the lack of transparency S.I. and Verizon have been showing during the application process for permanent nighttime lighting of a residential neighborhood at 2001 37th Ave. They recently released notes from the "Neighborhood Meeting" held via zoom on May 28. These notes were not provided to the SINA, as requested, but were found via a lengthy internet search.

The meeting notes do not indicate that the entire community was muted and no questions asked during the meeting were addressed. This is important. Since then, there have been ZERO additional opportunities to collect or impart feedback to SI. My calls have letters have received no reply. The installation of 90 foot lights, and all the downstream consequences to our neighborhood, deserve more consideration than that. We deserve to have a forum, in person ideally, to be heard.

Further, the information presented during this "meeting" was insufficient and not reviewed. At least one slide showed the relative cell phone coverage of our neighborhood showed my home as having little to no coverage. I have a Verizon device and have never had a problem with coverage in this home. I strongly challenge the veracity of this report and encourage the Planning members to do the same. Please do not base this decision solely on one side of the story. All good data can stand up to scrutiny. Now more than ever, we should be scrutinizing what we are presented with.

Finally, I received a letter (also posted to the SI website) detailing their argument for the lights. I found this to really stand out in my heart: In the first paragraph they admit that this project is an "enhancement" for their students. In the second paragraph the wording is changed to "necessity".

They may believe this will enhance their athletic program, but it will detract from residents reasonable enjoyment of their neighborhood. As for the claim this is needed, shouldn't we wait to see what large gatherings look like in the future rather than continuing to play from yesterday's playbook?

One extremely important question that SI has refused to answer is how many nights will the lights be used for? And how will they be tracked/measured/accountable to this? There are so many logistics that have not been worked out.

Please stay well and healthy. Thank you for your consideration.
Best,
Christine Crosby, Ph.D.

My name is Carole Gilbert and I live at 2179 40th Avenue in San Francisco.

Saint Ignatius (S.I.) is planning to install permanent 90 foot LED nighttime stadium lighting on their football field **in our residential neighborhood**. SI is proposing these stadium lights to be in use for over 150 nights a year and until 10 pm for most events.

Despite the current COVID-19 crises, Saint Ignatius has been able to move this project forward over a few weeks because one of their stadium light towers will hold Verizon wireless antennas. SI already has existing cell installations on their campus buildings.

During the current stay at home orders, SI is trying to sneak their giant stadium lighting project through the planning process quickly and with as little attention from neighbors and our city officials as possible. **The project has been renamed The Verizon Wireless Project when it is actually a project to install 4 Permanent Stadium Lights with massive impact on our neighborhood so that they can play sports until 10pm during weeknights.**

SI is not acting in good faith or as good neighbors. They scheduled a Zoom meeting as required by the Planning Department. All attendees except the SI staff were muted throughout the entire meeting. Very few of our questions that we pre-submitted were answered. The meeting was ended 20 minutes early with no opportunity for discussion. This is not in the spirit of the public meetings and public input required by SF Planning. SI is currently closed- why the rush to install these stadium lights now? It seems like they are trying to push their agenda through in a time when neighbors have little ability to fight this due to current stay at home orders.

This project is for the private usage of SI. It has no public value. Yet it will have a huge direct impact on the public - our neighborhood and we have no say in how this will be implemented. **These are not the actions of Good Neighbors.**

It's not just about the equipment (lights & cell tower.) It's about how the night activities will affect and disrupt our neighborhood evenings. During these events traffic increases, cars are parked illegally, the loudspeakers are clearly audible from my house, which is two blocks away from the field. There is often a large amount of trash littered on the surrounding streets. The lack of regard by SI for the neighborhood and the neighbors is very clear.

I don't understand the necessity for students to be attending practices for sports until 10pm when the school day ends many hours earlier. When do they do their homework. Education, not sports should be a priority.

Many of us bought our homes with full awareness of SI having weekday/weekend activities during the daytime - but to extend that into the evenings is new and unacceptable. **Please decline SI's request.**

Thank you,
Carole Gilbert

Protests to Against the Saint Ignatius Stadium Lighting Construction Project

Coral Ho <coral_ho@hotmail.com>
Tue 6/2/2020 3:02 PM

Hi Jeffrey & Delvin,

I am the resident of 40th Ave & Rivera Ave. I have been living in that area for 20 years and I am continuing oppose to the light installation project from Saint Ignatius School. The reasons are as the following.

1. If the light installed, the S.I. students will practice at the later time of the day. This would create parking problem in my neighborhood. As of the situation now, S.I. students usually go home around 5pm which will free up the parking space for the neighborhood to park when we go back home from work. However, if they stay late for practice with the lights on, then the parking space will be limited around the neighborhood around 5-9pm.
2. All the games at night time will create noise no matter what you do. Sometime when S.I. rented a light pole for night games, our neighborhood were all affected by the noise that create by the audience that no one can control it. We complain about noise is not based on nothing, we did experience it.
3. This project has been rejected by our neighborhood for 5 years, there are a lot of exchanging ownership for the houses in this neighborhood also. Why the new owners also reject about this project? There is only one reason which is the evening games with the lights on really affect our peaceful life in our neighborhood.
4. According to the letter that S.I sent to us, it states, "We believe this project will be of great benefit to the school and its students, while minimizing any disruption to the surrounding neighborhood." From this, we can see that this project is only benefit to the school and it's students, not for the neighborhood. Also, S.I agree that it will create disruption to the surrounding neighborhood because it stats that minimizing any disruption to the surrounding neighborhood.

S.I hosted a video conference with the neighborhood on 5/2020, however, S.I just express the benefit about the project, they did not let us to express our through and even stop the meeting after lots of neighbor wrote comment on the screen.

This project is only benefit to the S.I and create disruption to the surround neighborhood. As all people know that parking is a very big problem in San Francisco especially at the residential area, with this increasing practice and games happening after S.I install the light, it will get worst, plus the noise pollution from the extra games at evening time is something that no one can control of.

I hope you two can help me to express my concern towards this project and stop it for future discussion.

Coral

# MALMQUIST FAMILY TRUST

Denise Malmquist-Little & Allen Malmquist, Trustees

Messages: 415-665-4746 Email: florence723@yahoo.com Text: 415-601-2313

Attention: Corey Teague, Zoning Administrator, SF Planning Dept.

Corey Teague,

We have owned our family home since 1956, long before St. Ignatius High School bought and developed their present property at 2001 37th Ave SF CA 94116, in 1969.

Our property is in a residential area. Across the street was originally sand dunes. Across the dunes, we had Mark Twain Elementary (later Sunset Elementary), AP Giannini Junior High (later Middle School), and the West Sunset Recreation Complex (now expanded to include not just the rec building, library, playground, tennis courts, and baseball fields, but also soccer fields).

The parcel acquired by SI was, in the time of our home purchase, slated to further expansion of the West Sunset facilities, to include an Olympic sized swimming pool, and more. Never were their plans to include night functions – or more importantly: environment-altering exterior night lights as now proposed by SI.

**We strongly oppose the addition of lights on any height poles or other support system to the SI property.**

**We support the addition of Verizon equipment only if that equipment is on the 37th Avenue (East)side of the property, not along the 39th Avenue (West)side of the property which faces private residences. We would also support a location at the neighborhood garden.**

As a long time SF Catholic family (including a Catholic teacher), it is incomprehensible to us that:

1. SI used a horrific pandemic to push forward a physical plant project not related to safety nor the pandemic
2. SI is trying to pass off the project as a benefit for the neighborhood by attaching it to their own money-making venture with Verizon
3. SI has the nerve to say the project is a deep seeded need so the female population of the student body can have a sports program – a need brought about by SI CHOOSING to go co-ed in 1989 – over 30 years ago!
4. SI held what was to be a public Q/A meeting and

a. Muted all participants not on the SI presentation agenda (this could not have happened in an open actual physical presence meeting)
b. Used 40+ minutes of the allotted 60 minutes to repeat presentations given at past meetings on SI reasoning and Verizon projections and sports light company technology
c. Ignored a number of submitted questions and skirted the issues on those questions claimed to have been addressed
d. Closed the meeting 20 minutes early
    i. without ever acknowledging the 70+ neighbors zoom presence
    ii. nor opening to questions from those present
    iii. nor allowing any discussion of any points brought up during the ZOOM
    iv. nor allowing the discussion of topics important to the neighbors that SI did NOT bring up during the ZOOM

SI's methods and behavior in pushing forward on this project at this time of struggle for all citizens in un-Christian and sets a very poor example for the students of SI. Unfortunately, this is an extension of other failures of problems solving that SI very much needs to address.

We, as property owners, are opposed to the installation of lights on the SI property because

1. SI has already shown a lack of responsibility for their presence in the neighborhood following evening/night gatherings such as dances, plays, recitals, games as witnessed by
    a. The presence of urine left behind by students and activity participants on the private properties adjacent to SI
    b. The presence of garbage, including but not limited to cans, bottles, empty alcohol beverage containers, used condoms, medical gloves, food wrappers, syringes, and more on neighbor property, the public fields, on sidewalks, and in the streets
    c. Breaking of the San Francisco curfew time by youth hanging out in the soccer fields, the baseball fields, and in parked vehicles in the neighborhood
    d. Drug use by minors and other event attendees as witnessed by the scent of marijuana in the air, smoke presence from cigarettes and vaping devices
    e. Light, noise, parking violations, and other disturbances to the home life of the neighbors on Quintara & Rivera Streets, and on 39th Avenue, and Sunset residents beyond the border locations.
2. In researching the sale value of our property, we have been told by real estate professionals that the properties adjacent to SI are not appreciating in sale value at a level of similar properties farther away from the SI campus. Our tax value increases at the same rate as surrounding homes, but our sales value lags behind specifically due to
    a. the constant lack of parking during school days and evening activities

b. the use of the street by students as a training area
c. possibilities/chances of property damage
d. the disruptions listed directly above under #1.

We also object to the plan for lighting because

1. We cannot find environmental studies on file to show that our property will be safe from
    a. vibrations of boring
    b. underground displacement
    c. ground water disruption
    d. water supply (well at 40th/Quintara & SFWD supply pipes) contamination
2. We are aware of the neighborhood disruptions of light, noise, traffic, garbage, etc., caused by the field lights at South Sunset Playground and do not want the same disruptions in our neighborhood.
3. We do not want large supply vehicles damaging our street surfaces.
4. We do not want construction noise during the day, evening, or nights
5. Construction always brings about disruption of rodents … we don't want rodents on the move.
6. We do not see an environmental study for
    a. Animal habitat and life cycle safety affects
    b. Plant endangerment or disruption due to
        i. increased dirt in the air
        ii. changes in light cycles
        iii. changes in ground water movement
7. No other high school in SF has needed to put in lights for night games in order to have a successful and student-fulfilling sports program
8. No other high school in San Francisco has lights on its field for parent group activities, etc.
9. We do not see a lighted field with 150 night uses going to 10pm with participants hanging in the neighborhood unsupervised for hours followed the night activity in the field as good for the neighborhood, but do see it as harmful.

We do not see SI's actions nor attitude as being in any way "good neighborly." We feel that SI has not acted nor is acting in "good faith." We see no benefit for ourselves or the public in this project; the only known value is private and financial for SI. As long time property owners, we feel not only ignored but rudely dismissed. We do not see any neighborhood welfare consideration in the plan nor the actions of SI.

We plan to fully participate both independently of and with the Si Sunset Neighbors group in protesting and stopping the SI lighting project.

For the Malmquist Family Trust,
Allen Malmquist, Trustee, & Marie J. "Anita" Malmquist, Trustee & Resident

*Denise Malmquist-Little*
Denise Malmquist-Little, Trustee

To: SF Planning Commission,

We are against the lights at SI. We are against what affect this will have on our neighborhood. We are against lights being on for many hours after sunset many days of the year.

While it's true that many houses were bought after SI was here, the fact remains that when we bought, there was no practice field with lights on most nights until 8:00 and all practices and games were during daylight hours. I know that when girls joined the school it doubled the sports teams, but this greatly affects neighbors much farther than the surrounding blocks. In addition, SI rents out its fields to other groups and I'm sure that will become a more frequent practice when the field is accessible day and night.

I live on 36th Ave directly across from the practice field. This is an example of the view from my house when they brought in temporary lights last fall

And this is my usual view

And this is me in the middle of my house with all the lights off

I have nothing against SI.
My girls went there and got a great education. I just don't want to have lights shining in my house and blocking my view of the ocean and sunset every night for practices and on weekends, possibly even during the summer if they rent out the field.

Please vote against lights at SI.

Debbie Montarano
SI neighbor

## Horn, Jeffrey (CPC)

**From:** CPC-Commissions Secretary
**Sent:** Tuesday, May 12, 2020 8:57 AM
**To:** Diamond, Susan (CPC); Fung, Frank (CPC); Imperial, Theresa (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC)
**Cc:** Horn, Jeffrey (CPC)
**Subject:** FW: Regarding Planning Department record number 2018-012648CUA

Josephine O. Feliciano
**Commission Affairs**
San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.9111 | www.sfplanning.org
San Francisco Property Information Map

**REDUCED CAPACITY DURING THE SHELTER IN PLACE ORDER --** The Planning Department is open for business. Most of our staff are working from home and we're available by e-mail. Our Public Portal, where you can file new applications, and our award-winning Property Information Map are available 24/7. Similarly, the Board of Appeals and Board of Supervisors are accepting appeals via e-mail despite office closures. To protect everyone's health, all of our in-person services at 1650 and 1660 Mission Street are suspended, and the Planning and Historic Preservation Commissions are cancelled until April 9, at the earliest. Click here for more information.

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**From:** Jon LeFors <jon.lefors@outlook.com>
**Sent:** Monday, May 11, 2020 1:45 PM
**To:** CPC-Commissions Secretary <commissions.secretary@sfgov.org>
**Subject:** Regarding Planning Department record number 2018-012648CUA

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

Greetings

I am writing in regards to record number 2018-012648CUA, the St. Ignatius College Prep at 2001 37th Avenue request to install LED lights on their main sports field. I have six main areas of concern regarding the project (See below).

1. **Parking:** Parking is already an issue during the daytime hours with their regular students. I have lost track of the number of vehicles I have had to tow so that I could get out of my garage. Based on my weekend experiences with kids / parents attending events at the school, who are less familiar with the neighborhood and the parking rules, it will be a nightmare when there are events in the evening. I have already had the experience of someone purposely blocking my driveway knowing that I wouldn't be able to get parking enforcement here before they were done with their event. All of the above will be further exacerbated by the fact that there are far fewer parking spots available in the evening due to folks coming home from work and parking on street. Families on my street have a lot of vehicles, with five and six cars for two of the households, so this is a big deal.

2. **Traffic:** As with parking, this is already a madhouse in the morning and when school lets out. Parents regularly pull to a stop in the middle of the lane on Rivera to drop off and pick up kids, often on both sides of the street at once, making it scary / dangerous to get past. The traffic coming off of 37th onto Rivera is aggressive, not wanting to wait for a break, so they often pull in front of cars with the right of way. When there are sporting events it is not uncommon for one of the team busses to be double parked on Rivera between 37th and 38th, visually obscuring two cross-walks and the exit from the St. Ignatius parking structure. Getting past the bus requires pulling into oncoming traffic. And so on.

3. **Pedestrian Safety:** I am really thinking of myself (And my dog!) here, but the issues impact everyone walking in the area. Other than the crosswalk at Sunset, where there is a signal, and walk/don't-walk signs, all of the other crosswalks are uncontrolled. In the case of the ones at 37th and 38th there aren't even stop signs on Rivera, so pedestrians are reliant on motorists seeing them. Seeing people waiting to cross before they are already in the lane, everywhere except at Sunset, is very difficult / impossible, especially if SUV's are in the adjacent parking spaces. Add in the urgency on the pedestrians part to get to class / the game / practice and it gets dangerous. The final pedestrian danger zone is the exit from the St. Ignatius parking structure / campus onto Rivera as there is not stop sign for those exiting, and poor visibility for those entering. Even though the exit crosses the sidewalk, and pedestrians have the right of way, vehicles are often aggressive here and expect pedestrians to yield.

4. **Noise:** My house was built in 1946 and try as I might, it is proving very difficult to soundproof. As it stands now I hear everything for any of the events; every starters pistol, every coaches whistle, and every song when they just have music on during practice. Closing all of my windows helps, but not enough that I can't still hear everything over the sound of my stereo or TV. Having this noise continue into the evening hours when I am trying to relax would be very objectionable.

5. **Litter:** I have gotten used to the amount of litter the students generate and have accepted that it will never go away. I have also accepted that St. Ignatius would never send students or their own people out to pick things up, which is unfortunate. What I have noticed on the weekend events is that the parents are the real problem, leaving beer and wine bottles, pizza boxes, grocery sacks full of tail-gating trash, dirty diapers (Really), etc. This really gives me the sense, more than anything else, that they think this whole area is just a parking lot. And this is during the daytime.

6. **Communication with St. Ignatius:** I attended several community meetings with St. Ignatius soon after I bought my home in 2013. I found St. Ignatius to be less than candid, manipulative, and entirely self-serving. They said whatever they needed to in order to get us out of the room. They cried poverty at any suggestion that they spend money to address a problem. They don't want to take responsibility for anyone they loan their field to. Etc. If I thought there was a chance at an honest dialog, where my/our concerns could be heard and accepted as anything other than an impediment, I would be more willing to go along with their plans.

In summary, **please do not approve their request to add lights and hold more nighttime events.** I feel that there are too many existing issues with St. Ignatius as a neighbor to introduce even more with night activities at their main sports field.

Regards,

**Jon LeFors**
2936 Rivera Street, San Francisco CA 94116
C 415-847-5975

## Horn, Jeffrey (CPC)

**From:** Nina & Jay Manzo <nijaymanzo@yahoo.com>
**Sent:** Friday, May 01, 2020 10:08 AM
**To:** Horn, Jeffrey (CPC)
**Subject:** St. Ignatius Stadium Lighting 4/29 Community Meeting-- Proper procedure not followed.

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

Dear Planner Horn,

In reference to the St Ignatius' community zoom meeting on 4/29 concering stadium lighting at the SI playing fields. **It appears that proper project procedural steps were not being followed. The meeting should be considered invalid.** Tom Murphy from SI who led the zoom meeting, rushed the meeting, ending it twenty minutes early and did not attempt to answer any of the participant questions from the neighbors. Only some questions submitted in advance were answered. This is not the way to hold a community meeting and it was a meeting in bad faith. Many came away from the meeting stunned at SI's behaviour. **It is obvious that a zoom meeting is not the way to conduct this kind of community outreach and participation.** Many residents are left out of participating if they do not have the current technology. **The meeting should be redone once the Shelter in Place is lifted and the Planning Commission Hearing should be rescheduled as well.**

As a neighbor of this project (within 100') and a practicing architect in San Francisco-- I oppose it--The lights are out of scale with the neighborhood and more night games have more disruptive impact on the community. I'm very concerned that the SI Field lighting proposal has been approved to move forward without the due diligence that is owed to the community.

The lack of information warrants that the City hold off on approving this project, especially given the current shelter in place order which by definition limits community involvement and input.

Does SF Planning Dept have the following information that can be shared with the community?

1. SI needs to provide light levels, light trespass and overall photometric light studies showing the light that the immediate community will recieve. Previous community meetings requested this information-- **This was not presented in the 4/29 meeting. Merely saying that it has been done is not the same as producing the studies. Only aerial views were presented and these were not convincing.**

2. SI need to provide to the community a site section drawing showing scale of poles in reference to the houses across the street on 39th and on Rivera. **This was not presented in the 4/29 meeting. No daytime renderings of all four proposed lights from street level were shown. Only Verizon presented a street level view but it did not show the scale of houses across the street.**

3. The Verizon proposal for providing more cell service was unconvincing. The Verizon service proposed coverage map only provides more coverage for what is mostly the West Sunset Baseball and Soccer fields. Playing fields don't need essential service.

**How can residents judge the scale of the poles if they are not properly shown from the street level at all? Multiple daytime views are required.**

Overall **this is a woefully incomplete set of documents to put in front of a community** and a poorly conducted meeting by SI--it does little to relieve any apprehension about the lights being proposed. It

does show that SI has not really taken the communities needs seriously nor have they listened to their concerns. A unprecedented situation is being used to their advantage. The rushed pace of 4/29 meeting only underlined the sense that SI is not interested in our community. SI's gain is at the communities' loss.

**SF planning should not support this application as it does not benefit the community. This is a project that is out of scale with the neighborhood context and degrades it with increased noise, light and traffic pollution. It will be disruptive as it increases times of field use in the evening when local families are eating and resting. It will have an overall negative impact on residents' daily life.**

It is surprising that SI which touts itself on being community oriented is completely tone deaf in responding to the concerns of their neighbors and has made little progress in working with the community. Instead they have merely rehashed a previous submittal in hopes that we are all too distracted.

**We ask that you invalidate SI's 4/29 Community meeting on grounds of improper procedure--it should be redone properly and the 5/14 Planning Commission Meeting should be rescheduled until after the shelter in place is lifted. SI needs to provide better information to the community.**

Yours,

Jay Manzo
Please feel free to contact me.

## Horn, Jeffrey (CPC)

**From:** Jay Manzo <jay.zomanzo@gmail.com>
**Sent:** Monday, June 08, 2020 2:24 AM
**To:** Horn, Jeffrey (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Diamond, Susan (CPC); Fung, Frank (CPC); Imperial, Theresa (CPC); Johnson, Milicent (CPC); Mar, Gordon (BOS); Marstaff (BOS)
**Subject:** Please reject Saint Ignatius Stadium Lighting Proposal

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

Dear Planning Commission Members,

As a resident of the area around Saint Ignatius High School, I respectfully urge you to reject this proposal for stadium lights for the following reasons:

1) Speaking as a practicing 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 in this modest community. **SI has not even provided the community with renderings that show the full context of the 90'-0" light masts as the presented renderings conveniently omit the homes along 39th Street. This is because if the houses were shown, everyone would realize how massively out of scale and forbidding these lights will be. Out of character and looming, they will be blight to the community and city as a whole by changing the quiet character of the residential neighborhood. I do not think that this is the city that many residents want to live in.**

verizon
Sunset & Noriega Site # 255926
2001 37th Ave.
San Francisco, CA
2/6/20
Looking Northeast from 39th Ave.
View #2
insight photosim (707) 315-1585

t

2) **This is a Conditional Use Application but this project does not serve the public community or neighborhood --the main criteria for a conditional use application.** SI is a well known private school and is being mischaracterized by Planning as just a "neighborhood school". It is not a "neighborhood school" by any stretch of the imagination. It does not serve the community-neither its fields and pools are available to the community (except for swim lessons) and a sizeable percentage of the students are from places outside San Francisco.
This project does not meet the criteria of a CUA: The proposed lights will be used to 10pm degrading the public environment with light pollution 200 nights a week. The public is not served well-- The lights are only of benefit to SI. All the externalities of trash, noise, glare and traffic at night are the detriments that will be left for the public to suffer.

3) **SI plans to have Friday Night games that will only bring more people (2000 estimated--1000 more than current), traffic and noise and pollution to a residential area seriously degrading our neighborhood peace and health on a day that most folks want to have a quiet evening to start the weekend.** By moving to later games, SI will increase the traffic,noise and light pollution periods. **The project increases in traffic and people cannot be characterized by Planning as having "no change"--there will be a detrimental impact to the community**. Planning has not seriously addressed this increase.
Lightwise, SI has not provided convincing photometric studies--indeed Planning has not shown that the lights meet the CalGreen requirements (Adopted by SF) that limit footcandle trespass beyond property lines. The proposed photometrics are in excess of the Calgreen values. In addition, Verizon can probably find other areas for antennas **without lights** on SI property.
Day games as currently done are the best solution for the community; neighbors have communicated this to SI. The public is not served well by night games--our peace and quiet on Friday nights will be further changed with increased noise, traffic, light, and many times trash.

4) A personal note--I am an amateur astronomer-- I take great pleasure in using my telescope to show my sons and our friends the great skies we are so blessed to have out in the Sunset. At twilight we can see the phases of Venus. Jupiter and Mars can sometimes be seen at 8pm on winter and spring nights. San Francisco is a great city with a magnificent connection to the natural world. **Creating an environment with 200 nights a year of glare and light pollution until 10pm will take this privilege of starry nights away not only from me and my children, but from all the neighbors and their children.** (Unless you are staying up.) **This is just so a private school can have the games and practices at their pleasure--at the expense of the public's quality of life and a beautiful dark sky. This is not fair to the citizens who make their home here.**

Thank you,

Jay Manzo

May 5, 2020

Jeffery Horn
Senior Planner
San Francisco Planning Department
1650 Mission Street
San Francisco, CA 94103
Jeffrey.Horn@sfgov.org

Re: Conditional Use Application 2018-012648CUA at St. Ignatuis College Prep J.B. Murphy Field

Dear Mr. Horn,

My name is Joy Chan, our family lives in the Sunset District at 2819 Rivera St., right across from the St. Ignatuis (SI) College Prep J.B. Murphy Field, the outdoor football field. I am writing to strongly oppose the conditional use application for SI to install four (4) 90' permanent stadium light poles and one (1) Verizon wireless telecommunications services (WTS) facility antenna on one of the poles, at their football field. We want to express the following concerns prior to the May 14, 2020 Public Hearing Meeting:

1. The installation of these 90' light poles will have adverse and negative effects on the surrounding neighborhood. Sunset district is a residential neighborhood with mostly 2 to 3 stories high single-family houses and some multi-family units in specific zones like along Judah St. and Taraval St. The **proposed light pole of 90' is 3 times higher than the houses in the entire Sunset area**, even higher than any of the building structures at SI. This has a negative impact of the view and feel of the neighborhood and disturbance on the skyline. We understand that SI claims the higher the light pole, the more the light will shine down to the field and not to the neighbor houses. Our question is why do they need the lights?

2. Sunset district is a quiet residential neighborhood, where many of us come home at the end of a typical long workday to have some quiet and restful time. SI is proposing these stadium lights, allowing them to use for over 150 nights a year, i.e. almost every other day, and until 10 pm for athletic and other events. This will disturb the quietness of the neighborhood, **impose unnecessary noise and light pollution to the surrounding environment.** Also, not to mention, this will lead to other issues like parking, traffic control, safety, and environmental cleanliness. With years of living in this neighborhood, we tried to be good neighbors and bear the disturbance from all these issues. Regretfully to say, SI only manages their facility and immediately in front of their buildings, they do very little to manage those issues that bleed to the surrounding streets.

3. Although this project may meet minimum standards of the Planning Code, please consider why this project should be approved. SI is a high school and this football field facility is for their SI affiliated usage only, i.e. that is for a small group of San Francisco community (mostly affluent families) and **has no benefit to the general public**. Also, we have observed and did not find other public high schools in the City installed stadium lights and are using them for a considerable amount of nights throughout the year.

4. As this is a high impact project to the area, SI was meeting the Planning Department's requirement to host a Neighborhood meeting on April 29, 2020. However, in our opinion, the meeting was not successful and did not meet its original intent. We are aware that many of the neighbors felt the same way. For the scheduled 60 mins online meeting, SI allocated 15 mins for presenting the lighting design, 15 min for speaking about the Verizon plan, and with 20 mins left, Tom Murphy, SI Marketing and Communications/Project Lead, did not allow the attendees a Q&A session due to technical difficulties, he claimed. Despite the fact that technical difficulties might be true, our neighborhood organization sent a list of questions prior to the meeting and Tom could have used the time to answer those questions. Tom did not and claimed those questions are not directly related to the project. We feel **SI is not acting in good faith in this regard and provide lack of opportunities for the neighborhood to express concerns**, and that defeated the purpose of the neighborhood meeting. They just did the meeting to check the box.

5. Despite the current COVID-19 pandemic when many non-essential projects were slowed down and put on hold, SI tried to move this project forward, partnering with Verizon and combining the lighting project with the WTS antenna to classify as essential for emergency communication infrastructure. They should be considered two different projects. We also want to argue the necessity of additional WTS facility in the area. Looking at the Wireless Telecommunications Facilities Map available on SF Planning's website (see map below), the location of wireless/cell towers appears to be well distributed in the Outer Sunset area. We **do not really understand the need of additional wireless tower and what the benefits will be**. We are not sure if this may be a strategy for SI to partner with Verizon, getting their sponsorship on this project cost, receiving monetary benefits for leasing out the light pole for the antenna use, and using it as a vehicle to move through City's permitting review more quickly as an essential project. We, as general public, need the City Officials' help in keeping public benefits a priority when reviewing projects, if this WTS facility is really deem a necessity.

In conclusions, as a neighbor to SI who will be directly impacted by this project, we want to reiterate our perspectives in seeing the adverse impacts of the project. This project impacts the skyline of the neighborhood, leads to additional noise, light pollution and other issues like parking, traffic control, safety, and cleanliness to the surrounding environment. We do not understand why this project should be approved as it only provides benefits to a private party in the expense of suffering by the general public in the neighborhood. SI is handling this project poorly as reflected on how they ran the neighborhood meeting. They are just meeting the City requirements to host the meeting and check the box, but they do not really care about the neighbors' voices and do not plan to address them. Lastly, we should not let them move this project through quickly by combining it with the WTS facility and marked as essential. These are two different projects and the need of the additional cell tower is still a question.

Please seriously consider our concerns. We look to the City Officials as the subject matter experts and are confident and trustful that you will guard the gate and not approve project that has no benefits but negative impacts to the City in large. I hope this project will be not carried out with a "not in my backyard" manner. Thank you very much for your attention and reading this long letter.

Sincerely Yours,

Joy Chan

Resident at 2819 Rivera St.

Cc: Delvin Washington, delvin.washington@sfgov.org Manager, SF Planning Department
Corey Teague, corey.teague@sfgov.org Zoning Administrator, SF Planning Department

From: **Josette Goedert** <josette.goedert@gmail.com>
Date: Thu, Apr 30, 2020 at 11:14 AM
Subject: Saint Ignatius Record Number: 2018-012648CUA
To: <Jeffrey.Horn@sfgov.org>

Hi Jeffrey,

My husband and I along with approximately 90 other Outer Sunset residents attended the zoom meeting regarding Saint Ignatius' installation of lights and verizon cell towers.

I am extremely concerned because SI touts that they're good neighbors, but they indeed are not. SI made it incredibly difficult to find the zoom meeting notification on their website. You had to go all the way down to the bottom and click on their Good Neighbor Program and then hit the PDF link for the notice.

From there the notice didn't hyperlink the zoom meeting, which is extremely problematic for residents that do not know how or feel comfortable with technology. They also put another hinderance if you wanted to dial-in using your cell phone because the password was mostly letters along with only 1 or 2 numbers. If residents don't understand to input the letter associated with the number then they are barred from entering into this open meeting.

Once in the meeting they muted everyone's microphones on zoom, which I can understand due to the sensitivity of the issue and many residents disdain for their proposal. What I believe is not okay - is having a dog & pony show from the lighting rep along with the rep for Verizon. Yes, the residents need a general understanding of what they're trying to do, but not once did SI respond or answer the questions that were happening in the chat or what was sent to them prior to this meeting. SI also ended the meeting almost 22 minutes early where they couldn't taken the time to respond to our concerns. There is a Public Hearing still scheduled with your office on Thursday, May 14th and it should not still happen!

We did not get anything addressed and my fear is that SI, like usual, is moving through the motions to get what they want. The Verizon rep even said on the call that they do not need 90 foot lights in order to install their 5G technology. They can easily put it on the top of SI like the AT&T technology that already exists. SI is not a public school, so the community will not be able to (nor have we ever) been able to benefit from using their facilities (they closed access to the pool to the neighborhood a few years ago).

At what point do the neighbors get a say in what SI does? They are noisy, inconsiderate, rent out their field every weekend, the students double park or park in our driveways and now they want to incorporate lights that will stay on for almost 120-150 nights a year! When they had the temporary lights in the fall they didn't turn them off when they said they would and would remain on sometimes up until 11 PM. There will be more traffic in the neighborhood at night, less availability for us to park our vehicles near our homes, more noise during the week nights, more light pollution and litter.

We live directly across from their field and know first hand how awful of neighbors SI actually is versus what they say they are. We have 9 month old baby now and do not want lights or 5G technology across from our home as it drastically changes the nature of the Outer Sunset. We'd like to preserve the family oriented environment that has been developing over the years for young families here in the Outer Sunset. Please help us stop these projects!

**From:** "Goedert, Matthew" <mgoedert@nixonpeabody.com>
**Date:** May 5, 2020 at 3:49:00 PM PDT
**Subject: St. Ignatius High School Lighting and Verizon Wireless Proposal.**

Hi Gordon,

I am a Parkside resident. I attended the zoom meeting regarding Saint Ignatius' installation of a Verizon cell tower and football stadium lights. I am concerned about the SI's failure to provide reasonable access and notice of the pre-application meeting. In addition, I am concerned that SI did not address the light issues, existing and increased amplified noise issues, increased parking issues, existing and increased rental of SI's facilities to third-parties or the reason why the Verizon project has been expanded to add football stadium lights when all Verizon needs is one pole or a rooftop to place their equipment.

**Failure to provide reasonable access notice to pre-application meeting**
SI's notice of the pre-application meeting only included a zoom link to participate. SI failed to provide a dial-in number which excluded many of the neighbors from participating. While Zoom does allow for participants to dial-in, SI's created a password for the meeting that included letters along with one number. The meeting code they choose was "suf3ap". By using letters, it barred neighbors from dialing-in to the meeting. I understand that the City's Shelter-in Place Order has caused old protocols to be put on hold; however, the City's order did not relieve SI from using reasonable method for hosting a meeting by simply providing a telephone number. As a result, SI barred a large part of the populations from attending the meeting. Based on SI obligation to provide a pre-application meeting and effectively not provide one on April 29, 2020. The applicate is required to redo the meeting in order to reasonable provide an accessible meeting by providing a telephone call-in number or use zoom meeting with a call-in number that does not include letters in the meeting access code.

**Verizon**
Verizon is considered an essential business. However, the Verizon rep said during the zoom meeting made it clear that they do not need 90 foot football lights in order to install their 5G technology. They can easily put their technology on the top of SI's roof, like the AT&T technology, or use one 45 foot pole. Verizon does not need or want four 90 foot high football lights. SI is trying to use Verizon essential business status from the COVID-19 crisis to add football lights to their football field. By using this status, they would become the only high school in the city to have lights on their football field.

**Parking Issues**
Over the last 50 years, SI has changed from a boarding school for boys to a commuter school with more than 1800 students traveling from all parts of the bay area. This change in their business model has never been addressed. Being a commuter school results in an additional 500-700 cars in the residential neighborhood during the day. SI relies solely on the neighborhood to provide parking for its students. To make parking worse, SI prohibits students from using the parking in the front of the school which push student to park further out in the residential area. The parking issue will only be compound by adding football lights which would include additional cars driven by the parents, family, and friends of the students and visiting teams all trying to find parking. During the zoom meeting, SI failed to address the existing parking issue or how adding additional cars would affect the neighborhood.

**Noise Issue**
The school and football field are on a hill. The speakers used by the public announcement system on the football field are located much higher than the surrounding houses. The noise pollution from the field actually amplifies the sound after it clears the roofs of the nearby houses becomes trapping the backyards of the row houses. This results, the houses closest to the field being having to deal with noise levels that are louder in their backyards than in their front yards. This is problematic because many of us have young children that go to sleep around 7. Our child is unable to take a nap during the day due to the noise levels and adding night activities would result in her not being able to sleep until after 10.

**Lighting Issue**
The lighting diagram only show the direct light being produced in perfect weather conditions. It does not show the bleed of the light based on the actual weather conditions or the reflective light from the metal stadium seats, plastic track, white paint, and plastic football field. Any independent study would show that the houses immediately across the streets would be severely impacted due to the schools use of lighting. There is a reason why no other high schools has football lights. The only football fields with lights in the City are the community college and Kezar stadium. The community college complies with commercial parking requirements, did an impact study, environment study, and doesn't have residential neighbors feet away from their field. As for the other fields that are using similar lighting, they are all open to the public and each have better boundaries between them and residential housing. SI's does not provide access to their fields.

**Rental of SI's facilities to third-parties**
Before the stay at home order, SI's rented out their facilities to third-parties. Making the use of the football an everyday activity The football field was rent out between one to two days a week to third parties. Youth football, flag football, traveling teams, fun runs, SF Giants baseball, and summer camps, all rent out the field and all are not related to the students use of the field. Except for the traveling teams, each start a 7 am and goes to 5-6ish. SI's rental actively likely accounts for more than 20% of the field time. When you add in their other rental activities, SI is acting as a commercial space and not complying with the city ordinances regarding parking. In an effort to rent out the field, SI allows these activities to use the school speakers and lets them know about the free available parking.

**Trash**
SI's has failed to address the trash left by their students or the third-party renters in the neighborhood. SI has set forth no plan to pick up the trash left behind for its existing use or from its increased use.

**Environmental Study Require under the current plan**
The amount of dirt that will be required to be moved for the Verizon building and holes for 90 foot light automatically require an environmental study.

**Existing use permit requires them to benefit the community.**
SI does not provide any benefit to the community. The benefit described on their website require the community to pay full price to attend the sporting activities or theater. Requiring the public to pay for benefits is not a benefit.

SI is noisy, inconsiderate, rents out their field every weekend, the students double park or park in our driveways and now they want to incorporate lights that will stay on for almost 120-150 nights a year! When they had the temporary lights in the fall they didn't turn them off when they said they would and would remain on sometimes up until 11 PM. There will be more traffic in the neighborhood at night, less availability for us to park our vehicles near our homes, more noise during the week nights, more light pollution and litter. I would like to preserve the family oriented environment that has been developing over the years for young families.

Matthew Goedert Sent from my iPhone

**From:** Matthew <mattgoedert@yahoo.com>
**Date:** June 2, 2020 at 10:30:54 PM PDT
**To:** "Jeffrey.Horn@sfgov.org" <Jeffrey.Horn@sfgov.org>
**Cc:** "delvin.washington@sfgov.org" <delvin.washington@sfgov.org>, "joel.koppel@sfgov.org" <joel.koppel@sfgov.org>, "kathrin.moore@sfgov.org" <kathrin.moore@sfgov.org>, "sue.diamond@sfgov.org" <sue.diamond@sfgov.org>, "frank.fung@sfgov.org" <frank.fung@sfgov.org>, "theresa.imperial@sfgov.org" <theresa.imperial@sfgov.org>, "milicent.johnson@sfgov.org" <milicent.johnson@sfgov.org>
**Subject: SI Sunset Football Lights**

I am concerned with SI's summary of their answers to the issues brought up by the neighbors. The problem is SI wants the neighbors to lose their enjoyment of their residential homes for the benefit of their commercial enterprise (it's paying student and third party renters). Their answers to the neighbors' concerns are simply that they are going to interfere with our enjoyment and the neighbors should be happy to lose the ability to enjoy their property.

Their new PR spin is confusing. On the one hand, they say that they won't be expanding their use, and on the other hand, they need to expand their use to handle all of the sports that they added. The fact is the lights will expand their use and change the neighborhood.

My main concern is that they refuse to address their parking issues and have glib answers regarding the light and noise issues. Their light expert was the sale guy. Based on discussions with other lighting experts, they were unable confirm their "expert's" claims and suggested that such results would only be possible in prefect weather conditions. The noise issues are real and will interfere with the neighborhood children's ability to sleep at night. The neighborhood has a lot of children. There are more than 30 kids in the house closest to the field.

Their summary also miss quoted the Verizon speaker who clearly said that Verizon could put their equipment on the roof, but it would slightly change the coverage area. He didn't say that the possible loss of coverage area from the equipment would result in a loss of coverage. In fact he suggested that the roof could be used and that he did not need football lights.

There is a reason why no other school has football lights. There is a reason why parking is required for any commercial space requesting to use space in similar way. There is reason why the school does not want to address the huge parking issue that it currently has and will have it lights are added.

This was a residential area before the school was added. The school's growth should not change the original character of the neighborhood. The school is a tax-free entity that does not have to pay property taxes unlike its neighbors. The City should not be making exceptions to a non-public school that provide no benefits to the neighborhood.

The neighborhood has been an extremely good neighbor to the school. All we ask is that they be a good neighbor to us.
Please vote no to the lights. Or at the very least separate the lights from the Verizon equipment. Matthew

Matt Ciganek <mattc@vanguardsf.com>
Thu 6/4/2020 9:57 AM
To whom it may concern;

Regarding the proposed changes to add lights to the field at SI to create a new night-time event space, I have a few questions for the planning commission.

1) Why was the “call” from SI cut off before questions could be heard? I was on the call and there were many residents with questions being reflected on the “chat” feature. There was no opportunity to ask questions.

2) What is SF Planning’ s threshold for neighborhood input reflecting a negative opinion of the project in the surrounding area by Sunset District residents?

3) If approved, how will this project affect SF Plannings approach to any / all other parks and fields in San Francisco who want to add night lights? Given that LED lights are “affordable” by using less power than traditional lighting and purportedly directed in towards a field or park, isn’t it likely that this type of improvement will be implemented in many other locations? How would that affect public safety in affected neighborhoods at night due to increased activity and light pollution in the city as a whole?

This process feels pre-approved like it’s proceeding through bureaucratic process with no actual consideration of the problems it’s creating. I appreciate that Planning extended the period of time for consideration but this is an exceptional time in all of our lives and this extension is likely not enough for a decision on a project of this magnitude.

The Sunset District is a strong community of residents, students and local businesses. Planning should recognize that this is no longer a sleepy bedroom community on the outskirts of San Francisco. Attention needs to be given to the residents who already have a lot of school events that impact the neighborhood taking place on a year round basis. SI has been here for a long time but that’s not to say their desires are more important than the residents of the community. Changes this impactful should be considered very carefully.

Thank you,
Matt Ciganek
415-240-9901
2064 Great Highway

**Matt Ciganek**
Multi Family / Residential Investment Sales
DRE #01871937
C:415.240.9901
Vanguard Market Reports

Mr. Jeff Horn

City of San Francisco - Planning Department

1650 Mission Street, Suite 400

San Francisco, CA 94103

Tel: 415.575.6925

Email: Jeffrey.Horn@sfgov.org

RE: Conditional Use Permit

2001 37th Avenue

Record Number: 2018-012648CUA

Mr. Horn,

We're in receipt of the Notice of Public Hearing on the referenced project. As a long time resident and home owner in this community, we're accustomed to the vehicles and noise during school rush hours and events. However, we certainly have concern with changes that can exasperate rather than improved the existing condition. The following are concerns regarding the proposed CUP for additional lighting and more critically night activities in our residential neighborhood.

Following are comments and questions to the applicant's Project Application General Information form.

**Project Application Statements:**

**Environmental Evaluation Screening Form**

#8. Air Quality - applicant stated the project will NOT add new sensitive receptors to residential dwellings, and schools within an Air Pollutant Exposure Zone. Has the City analyzed the **air, noise, traffic, and parking impact** from these **additional night activities** to the adjacent residential community? These activities will most definitely negatively impact our residential community's right to peace, and quiet at our most precious wind down time from a day's work.

Parking – City Planners should review the parking impact to the adjacent residential as it is today. During school session, or school sports events, the residential streets are fully occupied by student and event attendee vehicles. With the addition of night activities, residence returning home from a day's work may not be able to find parking space near their place of rest, or can find the driveway blocked.

Lighting – project propose four ninety feet (90') tall light. The proposed light is probably over 4.5 times the height of the residential homes. The light source of these 90' high poles can be in

the direct view line of these homes. Homes along 39th Ave can very well look right into these 90' tall lights. Applicant's graphic presentation presents a controlled light distribution. Please have applicant provide photos of exact similar condition and product to confirm accuracy of the graphic presentation. How high are these 90' tall lights in appearance adjacent to the residential homes?

**Priority General Plan Policies Findings:**

Item#1 – Applicant's stated that the lights and additional activities will bring people to the neighborhood is correct, but that is precisely the concern the community has with an influx of people, cars, noise, into the residential neighborhood during a period most family desire quiet enjoyment of family time. Also the statement that local restaurants will benefit from these increased traffic does not seem to be correct, as it appears that a majority of event attendees immediately depart from the Sunset District.

Item#2 – Can applicant provide data and events that occurred during the past minimum two years on under privileged youth activities utilizing the fields?

Item #8 – Can applicant clarify the statement that this project will enhance the use of West Sunset soccer fields and reduce traffic in the area on Saturday. How does the additional separate activities on the SI field reduce the traffic on the soccer fields?

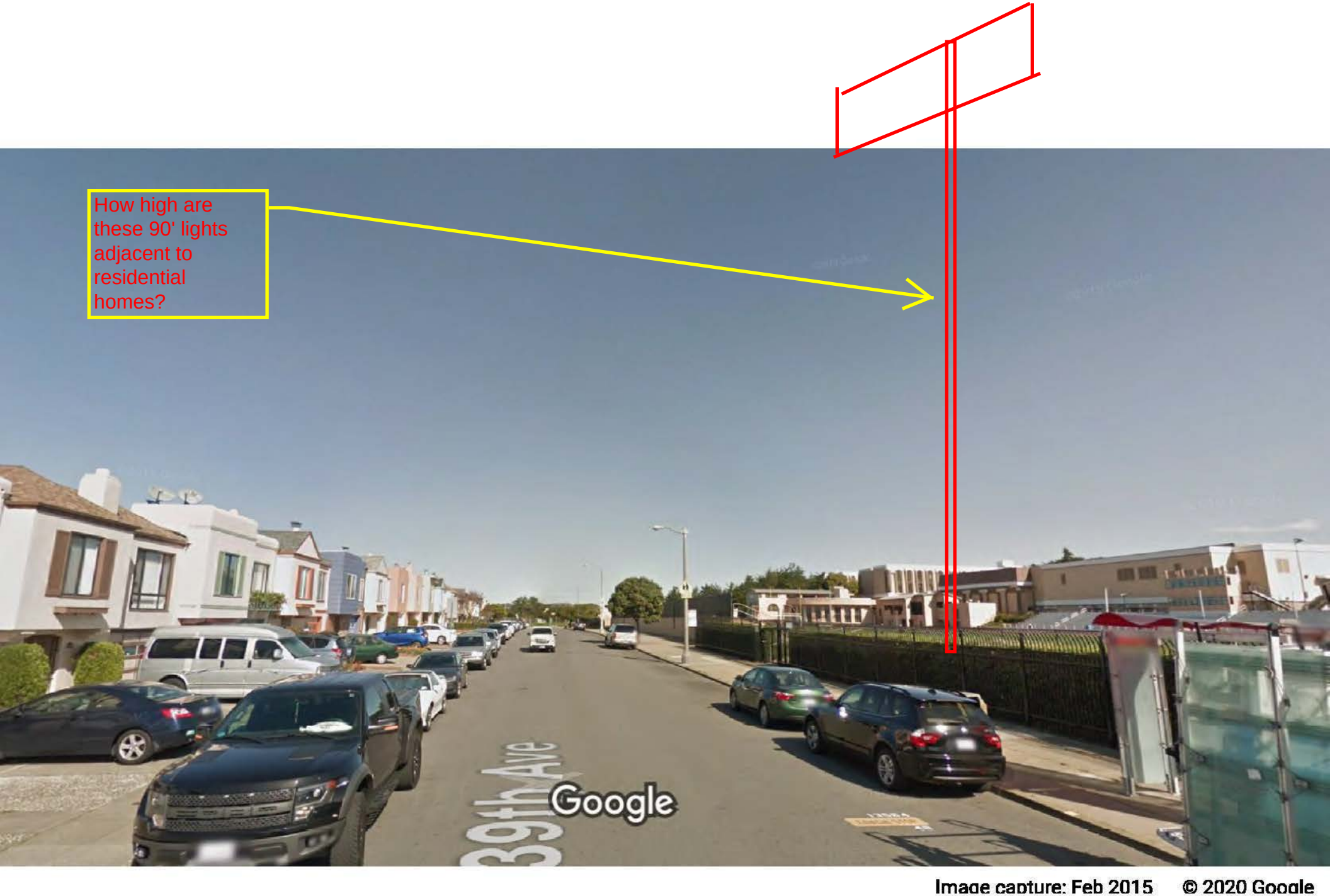
Regards,

Mr. Chu

2235 38th Ave

Will residence look right into these lights?
How tall are these lights adjacent to residential homes?
F1
F2
F3
F4
Bleachers
St Ignatius Prep School FB/S
San Francisco,CA
EQUIPMENT LAYOUT
INCLUDES:
- Bleachers
- Football
- Soccer
- Track
Electrical System Requirements: Refer to Amperage
Draw Chart and/or the "Musco Control System Sum
for electrical sizing.
Installation Requirements: Results assume ± 3%
nominal voltage at line side of the driver and structu
located within 3 feet (1m) of design locations.
EQUIPMENT LIST FOR AREAS SHOWN
Pole
Luminai
QTY
LOCATION
CLASS
GRADE ELEVATION
MOUNTING HEIGHT
1
F1
LSS90C
-
15'
65'
90'
1
F2
LSS90C
-1'
15'
64'
89'
2
F3-F4
LSS80C
7'
22'
65'
87'
4
TOTALS
SINGLE LUMINAIRE AMPERAGE DRAW CHART
Ballast Specifications
Line Amperage Per L
Single Phase Voltage
208
220
240
277
TLC-LED-400
2.5
2.3
2.1
1.9
TLC-BT-575
3.2
3.0
2.8
2.4
TLC-LED-1150
6.8
6.5
5.9
5.1

Will residence on 39th Ave look into this?


How high are these 90' lights adjacent to residential homes?
39th Ave
Google
Image capture: Feb 2015 © 2020 Google

## Horn, Jeffrey (CPC)

**From:** Nina & Jay Manzo <nijaymanzo@yahoo.com>
**Sent:** Wednesday, May 06, 2020 4:33 PM
**To:** Marstaff (BOS); Horn, Jeffrey (CPC); CPC-Commissions Secretary
**Subject:** S.I. Stadium Lights in Context
**Attachments:** 200506 SI LIGHTS SITE X_SECTION 39TH AVE.pdf; 200506 SI LIGHTS SITE X_SECTION 39TH_40TH AVES.pdf

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

Dear Planner Horn, Planning Commissioners and Supervisor Mar,

As a homeowner with a family and two children living near S.I., I want to tell you that I am strongly opposed to the proposed stadium lights and cell antenna project. I hope you understand how distressing this proposal is for nearby residents, especially having it reviewed during these difficult times in which we are already experiencing great stresses and uncertainty. To see the peacefulness of our homes threatened by this project is extremely disturbing. **This project will be a massive visual blight to the neighborhood, as well as impose so many additional nuisances (like traffic, parking issues, light pollution, noise, litter, etc).**

I can't understand how the Planning Department or Commission could even consider this project, as it doesn't meet the requirements of a Conditional Use Permit per the Zoning Code. Even in the recent community Zoom meeting hosted by S.I., there was no mention of how this project would be desirable for, compatible with, or serve us non-S.I.-affiliated residents here the neighborhood (see SF Planning Code Section 303(c)).

As an architect I think often about the message that the built environment expresses. These **grossly out-of-scale light poles and antennas**, erected by Verizon (certainly at a great profit in terms of rental income to S.I.) send the message that this private institution, with very little neighborhood basis, values their own needs and profits far above the interests of the surrounding community. The significance of private organized sports and cellular communications, as embodied in these massive towers, will be looming over all of us in the area. It will be seen and felt constantly from our front yards, our rear yards, our decks, our living rooms, dining rooms and bedrooms. The brilliant LED light-throw, cheering crowds, and amplified announcements will reign over our family dinners and the evening down-time we and all our neighbors want to enjoy at home. And the 5G cell antennas (with there as-yet-unknown health impacts) will be running constantly 24-hours a day over the heads of all our neighborhood children.

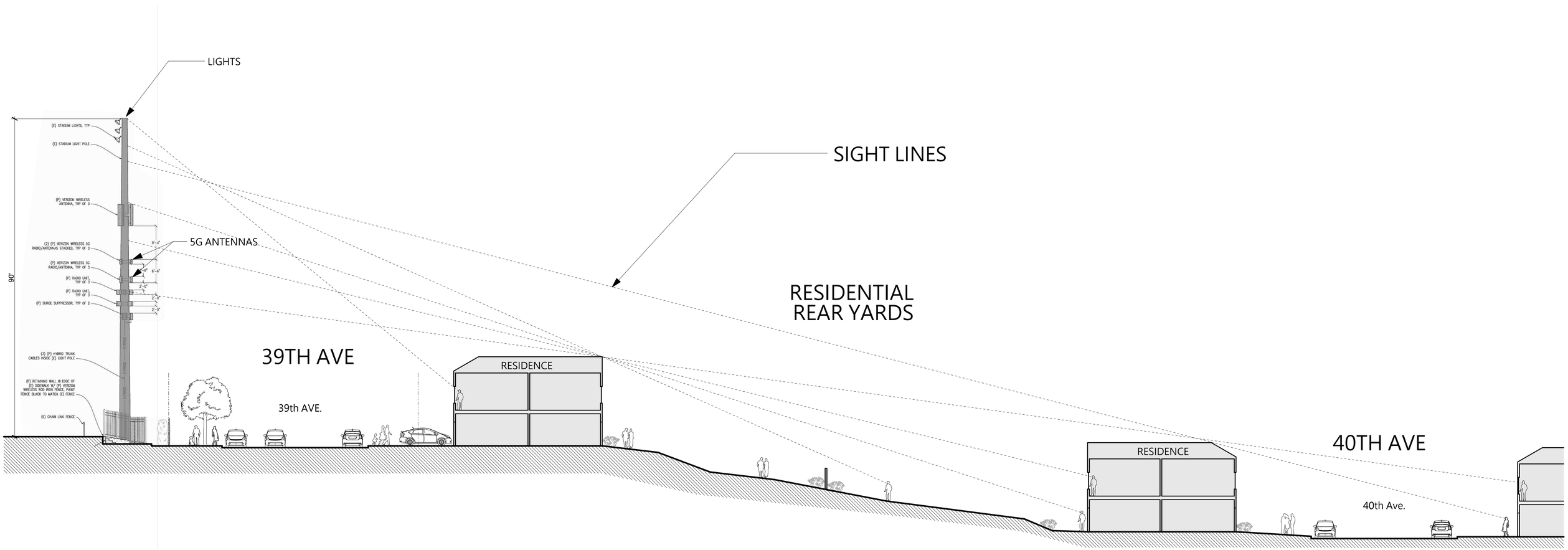
Please do not approve this unfortunate proposal! Let's not see this neighborhood spoiled by this. So many other San Franciscans visit these few blocks when using the public facilities at West Sunset Soccer and Baseball Fields, as well as the West Sunset Library, AP Giannini (where one of my sons is a student), Sunset Elementary, and even the West Sunset Community Garden (which we belong to). They will be walking beneath these gargantuan looming private towers which are so **extremely out and character with the surrounding neighborhood and larger Sunset District**.

Please see the attached drawings I prepared which show Verizon's poles and antennas drawn to scale, and put into the neighborhood context. Such drawings were not provided by S.I., but I wanted to see the actual impact to our neighborhood, in terms of height, bulk, and sight lines. You can see how **out of scale with the neighborhood the proposed lights and antennas are.**

Thank you for considering my concerns.

Sincerely,
Nina Manzo

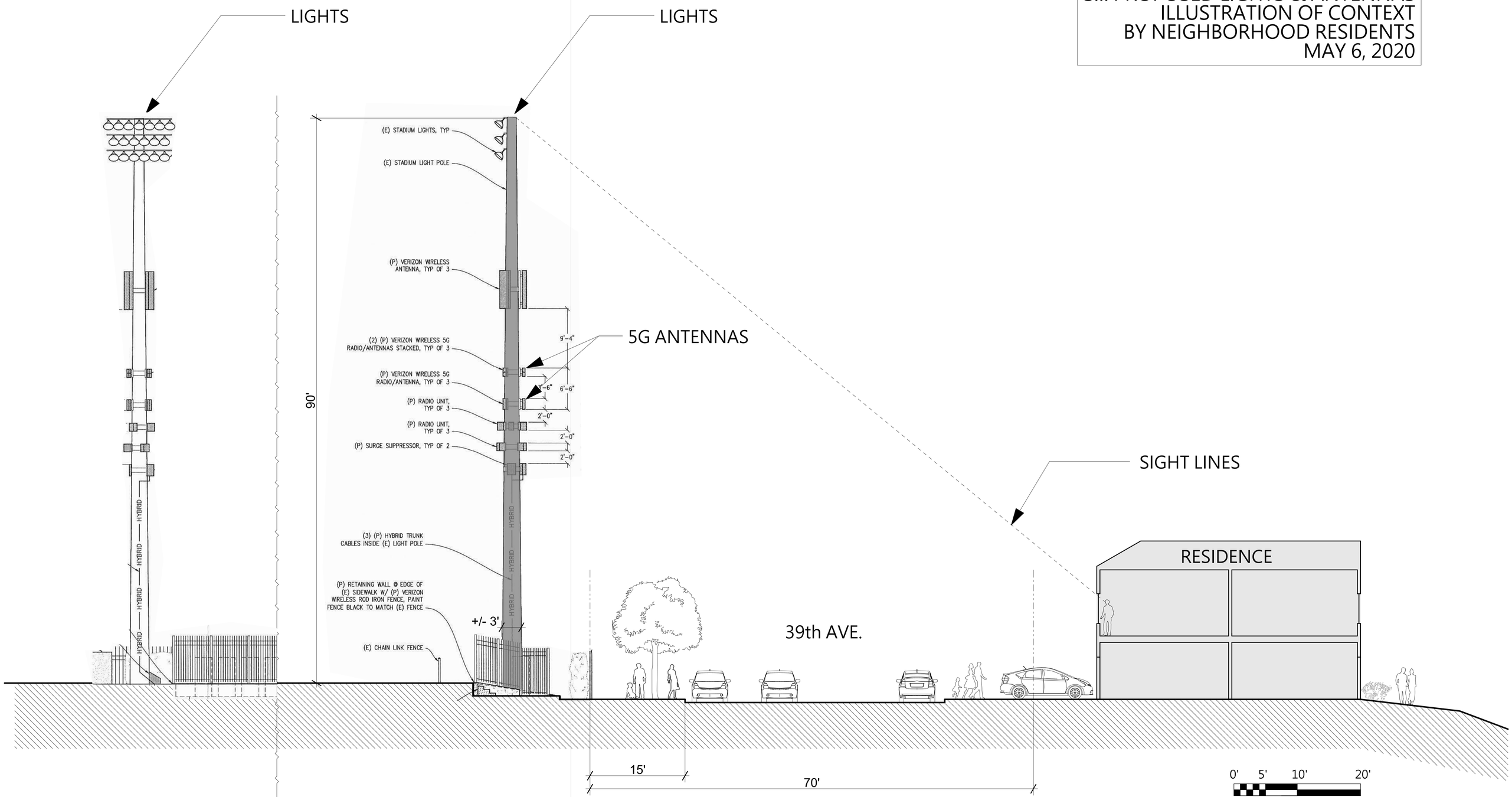
S.I. PROPOSED LIGHTS & ANTENNAS
ILLUSTRATION OF CONTEXT
BY NEIGHBORHOOD RESIDENTS
MAY 6, 2020




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

# 39TH & 40TH AVENUE VIEW

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




POLE EAST ELEVATION
PER SHEET A-5

SITE CROSS-SECTION AT POLE
PER SHEET A-3
LOOKING SOUTH

# 39TH AVENUE VIEW

<villageattab@yahoo.com>

I live on 38th ave between Ulloa and Taraval and I am deeply concerned and disappointed that such a school as St. Ignatius had decided to put invasive lights on the football fields that will surely, as they know well, will disturb the peace and harmony of the neighborhood.

They already have a stike against them by putting an giant artificial turf that gives you virtigo if you walk by the school and especially on a sunny day, the smell of chemicals from the turff is suffocating. The night lights will cause disturbance after the sunset to neighbors and birds on the trees of the glorious Sunset Avenue.

The crowd will cause noise also, more traffic at night and many other problems. St. Ignatius isn't a sports school, it is an institution to educate, they don't have to push it that much to the point of having night lights. As a long standing school, they should keep to the tradition of respecting the neighbors over profits.

Nafiss Griffis

## Horn, Jeffrey (CPC)

**From:** Peter Koch <kochsf@att.net>
**Sent:** Thursday, June 04, 2020 9:52 AM
**To:** Horn, Jeffrey (CPC); Teague, Corey (CPC); Hillis, Rich (CPC); Washington, Delvin (CPC); Koppel, Joel (CPC); Marstaff (BOS)
**Subject:** St. Ignatius High School Lights Project

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

Good Morning,

I hope you are all healthy and safe. My name is Peter Koch and I live at 2825 Rivera St. SF. CA I want to express my deep concern and opposition to the proposed lights project at Saint Ignatius High School.

I have been living in front of this athletic field for close to 30 years and this proposal worries me and my family greatly ! Over the past several years SI has increased their use of the field to include both Saturday & Sunday events . The parking and Traffic along with the noise on a Sunday morning is horrific.

This proposal to have Friday night football games, along with maybe 2,000 fans , in this quiet residential neighborhood is unbelievable. Saint Ignatius has no right to impose on this neighborhood events that will so dramatically alter our lives and change the feel of this quiet community.

Also, they have done a poor job in addressing our communities concerns regarding Traffic, Noise, Parking , Light Pollution, Garbage. I also have grave concerns regarding the 5G network proposed on one of the lite towers. There have been no answers to our questions regarding the safety of these fixtures.

I am vehemently opposed to this project and also the way Saint Ignatius has disregarded the concerns of this neighborhood and community.
Please hear our concerns !!!

Stay Healthy & Safe,
Peter & Sandy Koch

To whom it may concern,

I, Randall Hung and the rest of my fellow neighbors feel strongly against Saint Ignatius' plans for their new proposed stadium lights. Everything about this was poorly conducted and planned, from the initial start of the project to their so called community outreach conducted over Zoom. We were promised an hour long meeting with a time slot for us to ask questions/express concerns. We were all muted during the meeting, which I understand, but we were prompted kicked off after 40 minutes without being able to ask questions. I would not even call it a meeting, it was a sales call informing us about the companies advancement in technology, which has absolutely nothing to do with us nor the project. We feel that saint Ignatius is not acting out in good behavior and will do whatever they feel they are entitled to.

We have expressed our concerns about parking, noise pollution, garbage pollution, and light pollution. How will Saint Ignatius work with the neighborhood on these topics and many more? How will Saint Ignatius monitor and control traffic? Where will we park when we come home? Who will clean up the garbage that the parents, teachers, and students will cause? We already run into issues with parking and garbage pollution. We do not want or need anymore.

Saint Ignatius claims to be a neighborhood friend, but unfortunately, they are not. Few years back, as a compensation to our concerns, they offered us tickets to their games and school events. Is that all we're worth, free tickets? To them, we are just a joke and only in their way of getting what they want. Other schools already send their students off campus for games/practices during school, why does Saint Ignatius feel that they are above everything else? Entitlement.

Sincerely,

Randall Hung

## Horn, Jeffrey (CPC)

**From:** seiko grant <sgrant654@gmail.com>
**Sent:** Thursday, May 07, 2020 7:28 PM
**To:** Horn, Jeffrey (CPC)
**Cc:** Teague, Corey (CPC); Washington, Delvin (CPC); Hillis, Rich (CPC)
**Subject:** Conditional Use Application #2018-012648CUA

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

From:Seiko Grant
2931 Rivera St.
San Francisco, CA 94116
05/01/20

To: Jeffrey Horn, Senior Project Planner
SF Planning Dept.
1650 Mission St
San Francisco, CA 94103

Re: Night Lighting at Saint Ignatius College Preparatory

Dear Jeffrey Horn,

My name is Seiko Grant and I have lived in the Sunset District for 56 years, 53 of those in my current home at 2931 Rivera St. During this time I watched Saint Ignatius College Preparatory (SI) high school being built and transition from an all-boys to a co-ed school. The residents adjusted to the increasing traffic,parking issues and weekend noise from events at the J.B Murphy field. We could always depend on a return to quiet streets in the evening after a full day of work and to get to sleep in preparation for the next day. This is a basic condition that everyone, including all of you in the planning department, needs for a healthy existence.This is why we chose to invest our money and spend our lives here. Our homes provide a space to rest and gather comfort. Our neighborhood is a source of support and safety.We feel very fortunate.

Saint Ignatius College Preparatory school (SI) is planning to install permanent night time stadium lighting on J.B Murphy field using LED lighting on poles rising 90’ high. They anticipate use of the lights for over 150 nights a year and until 10:00 pm in most cases.The administration at SI have not been forthcoming about the specifics of this proposal. Details have been changing in every announcement ( initially they stated only 10 night events a year) and emerging sporadically. Though legally required meetings have been held and advisory notices distributed, feedback from residents affected by this plan is not given much weight as this project is considered by SI as destined to be completed according to their wishes. In enlisting a telecommunications provider, Verizon Wireless,to install a series of antennas to one of the proposed 90’ light poles, the project may be considered an essential service and thus fast-tracked even during the shelter-in-place order. One of graphics, presented by the Verizon representative to demonstrate how the proposed installation would remedy a lack of coverage to access wireless services, revealed that only the baseball fields at West Sunset recreation area and part of Sunset Blvd had less coverage. The Ortega library and neighboring homes have very good wireless connections and nothing additional is needed in the open fields.

Light pollution,noise pollution and increased traffic to the extent that they would significantly effect living conditions for a large number of residents and avian life in the area surrounding the J.B.Murphy field are of great concern. A thorough

investigation into these effects including a full environmental review in accordance with the California Environmental Quality Act must be conducted. I strongly object to the exemption from environmental review. On the one hand, in the conditional use application, SI states that " Traffic will not be increased, as persons already attending the school will use the field." In the project application, they state that " The lights bring people to the neighborhood.." and " the field is used by a variety of non-profit institutions…". These conflicting statements must be resolved. A greater number of night events will definitely increase traffic.

One reasoning for SI wanting to go forward with this project as stated by their representative,
Mr. Tom Murphy, in the online meeting of 4/30/20 is to allow a later start time of the school day quoting studies showing later sleep cycles for teenagers. Again in the project application ,"..providing greater opportunities for students to have adequate sleep." Mr. Murphy also mentioned that night games during the week will allow those families to have weekends free and reduce traffic on Saturday. Would that they have as much concern for the weekends and sleep time of the neighborhood residents to whom they say they want to be good neighbors. The enhanced educational experience desired by SI would be better served by teaching the students time management and that participation in extra curricular activities require adjustments which may not always be convenient.

There is no other school in San Francisco, public or private, which has lighted fields on their campus. All those schools continue to provide excellent educational experiences without negatively disrupting the lives of the neighborhood. There was no discussion or questions allowed at this meeting that were not "related to the project". I consider the concerns of the residents living around the field directly related to the project.

Any other parks in San Francisco with night lighting are open for use by the general public.
The "expanded use of existing open space" at J.B. Murphy field is restricted to the students/families of SI. The cost, including reduced property values, will be born by the entire neighborhood. I object to the proposed night lighting on the fields at Saint Ignatius College Preparatory and request that this commission decline to approve this project.

Sincerely,

Seiko Grant

## Horn, Jeffrey (CPC)

**From:** seiko grant <sgrant654@gmail.com>
**Sent:** Thursday, June 04, 2020 12:10 AM
**To:** Horn, Jeffrey (CPC)
**Subject:** 2018-012648CUA

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

SF Planning Dept.
1650 Mission ST #400
SF, CA 94102
6/2/20

Seiko Grant
2931 Rivera St.
S.F., CA 94116

Re: case# 2018-012648CUA
Response from Saint Ignatius College Preparatory

This case involves proposed night lighting at J.B.Murphy field in the middle of a residential neighborhood for private use by the school. Many residents in this neighborhood raised objections and questions which these letters claim to address. I found the responses to be inadequate in light of the permanent and significant negative effect this project will have on the neighborhood.

In these letters, representatives of Saint Ignatius College Preparatory (SI)state a "need" for the lights because the students "need" the lights. High school sports is ,for many, a special part of the school experience, and it is an extra curricular activity. Students want (not need) to participate. There are requirements to participation which both students and parents must understand and agree to. These are not always convenient, as in waking up early (which is an admirable and productive habit) to begin practice "at the crack of dawn" and driving in to SF from surrounding Bay Area cities, where many of these athletes live, on a Saturday or Sunday.I speak from experience. SI wishes to "reduce the need to utilize off-campus fields and to make the use more manageable and better for our students". This statement indicates that there are off-campus fields available for their use. When a school decides to expand its sports program, it needs to take into account the manageability of the expansion with the existing facilities and neighborhood in mind. Making it "better" for the students at the expense of the residents is not acceptable.
To say that the proposal is not a change but merely shifts the time and/or days of the existing activities is avoiding the point that the later times are indeed a change that will encroach on the evening lives of the residents. There will be more activity on nights when there previously was quiet. Spreading out disruption over two days (Fri and Sat) instead of all on one day(Sat) is not an improvement by any means.Replacing several nights per year of " the noisy use of generator-powered temporary construction light"is more tolerable and preferable to 154 nights of lights no matter the spill and glare shielding they claim.The lights will be visible and the noise audible from afar.
Their attempt to dismiss traffic and congestion concerns by stating that only students already in attendance at the school will be participating ignores the families and friends of the not only SI teams but those of the opposing teams and the "SI affiliated groups" that utilize the field.
I am also concerned with their vague wording when asked the number of nights and time of light shut off for the various activities in both the letter to neighbors and the summary of discussion .At an initial community meeting, I heard over and over from proponents of the project including the president of SI, "It will only be 10 games a year". There was no mention of the night practices or low attendance games for which we still have no set number.The summary of discussion document contains phrases such as "large attendance/noisy events will not occur very often" and" large attendance games will be the exception , not the rule".They write "we do not envision greater than 4 or 5 large attendance night games" in the summary and in the letter to neighbors state "the 2020-2021 school year would have 6

high attendance night games on the lower field-3 football games,2 soccer games and a lacrosse game" . In replies to questions 11 and 21 the response includes the lines "SI is requesting usage until 10pm so as not to restrict future unplanned and/or changed use of the field due to schedule and league changes" and "We are requesting to have the lights on until 10pm on weeknights and 8 pm on weekends as we are unsure of future needs. At this time, in the short term, we foresee the lights being use primarily for low attendance practices." I see here elusive wording that allows for much expansion in the future. I stress that 10pm is very late for such lighting on a weeknight . All the fields with "similar lights" referred to in response to question 21 of the summary of discussion are public fields. Imagine stadium lights outside your house until 10 pm during the week ,especially if you have children or rise early for work, as many of us do.
Sincerely,
Seiko Grant

Dear Members of the SF Planning Department and Commissioners,

I just can't see this adding up. Saint Ignatius want's 90 foot light poles to facilitate student athletics? Is this for the direct benefit of SI's students, or just student athletes?

According to SI's recent postcard, they would "only" use the lighting 200 nights?

200 nights/year = 40 weeks = 5/7 illuminated nights/week for the standard school year:

California requires in class instruction at a minimum of :
180 days/year for grades 4-8 at 900 hours/year, and
180 days/year for grades 9-12 at 1,080 hours/year

900 hrs. / 6 instructional hours/day = 150 days/yr. = 30 weeks/year. Illumination happens during illuminated nights even when school isn't in session (grades 6-8)

Looking at grades 9-12:

1080 hrs. / 6 instructional hours/day = 180 days/yr. = 36 weeks/year. Illumination is at least happening 20 illuminated nights absent school in session.

The fact that SI apparently <u>knows already future scheduled illumination dates</u> makes it very difficult for them to revoke promises and contracts they've already signed with other schools, organizations, etc.

1. Doesn't this put extra influence, pressure on the Commissioners and SF Planning Department and others who make the decision on the "proposed lighting question" **<u>to rubber stamp if not reward Si's proactive but controversial move</u>** (regarding schedule, promises and contracts) with little if any really time for public comment or a fair airing of contrary viewpoints?

Has SI entered into contracts without full disclosure of the permissions/permitting process they've yet to complete in order to fulfill any contract? What does this demonstrate to their students? We can break the law and get away with it if you don't get caught?!!

Where is the Democracy, what are the values SI is demonstrating to its students?
When SI needs its students' cars to NOT be towed when their students park and obstruct neighborhood residents' driveways, liter the neighborhood, throw eggs on houses in retaliation and other malicious acts, SI wants the neighbors to "be kind".
But when the neighbors want a courtesy extend to them it appears SI plays lip service but acts only in SI's interest and refuses to consider compromise. Can't the Verizon tower(s) be atop the north SI buildings and the light poles be a maximum of 45 feet high and maybe operational 2-3 nights/week if at all? Fact is the height of the light towers are for the cellular provider and have <u>nothing</u> to do with the lighting needs of SI. That is, of course, if the needs of SI are based foremost on what's in the best interest of the SI students.

Even if the lights are on 4 hours/day x 200 days = 800 hours/year according to the postcard SI is suggesting students (athletic) spend potentially 10-11+ hours/day at school ( 6-7 hours of instruction + 4 hrs. in practice/playing sports).
SI argues their students (athletic and non-athletic) need more sleep so they will start the school day later and thus the school day goes longer into the evening for practice / game times.

2. What's the average commute time for an SI student? Minimum 1 hour each way if they don't live in SF?

Thus: 7 hours instruction w/ 30 min. lunch and 5 min. between classes
9 hours sleep (if the student actually is using their spare time to sleep)
2 hours commute time to SI for academic instruction, (but not practice or game time)
Total = 18 hours leaving only

In general, a non-athlete has just 6 hours/day M-F for potentially:
2 hours for family time (meals, breakfast/supper and how many eat in transit?) and 4 hours to study with no time to have a mental or physical break (no time to text, watch TV, play video games? no way!)*.

Add 2-4 hours for the student athlete's time for practice (daily, 2 hours, 4 hours on game days)
Total jumps to 20-22 hours (6/7 days per week considering games played on Saturdays).

The student athlete <u>might have time to eat</u>, but productive, studying time or time for homework? The choice becomes grades or sleep, grades will win and the student athlete is still "sleep deprived".

* How does this education schedule/system honestly and in practice meet the SI stated objective and goals, "educates all aspects of our students according to the Jesuit philosophy of *Cura Personalis*, care for the whole person" (courtesy of the SI website https://www.siprep.org

What is the SI administration's and SI Athletic Department's priority for an SI student?

3. Education or Participating in Athletics to ensure <u>income</u> for SI?

Isn't SI doing the same thing the PAC10, Big 10 and other conferences and leagues at the collegiate level do? That is, they are relying on sporting events, generate alumni bragging rights which in turn generate the majority of operating revenues via donations and attending sporting events with <u>*the student athlete being exploited for the betterment (financially) of the institution*</u>?

AND, are sporting events taking precedence to lifelong skills? Is SI choosing sports rather than an opportunity to provide better education to all, glorify brain power, develop honor in intelligence vs. disparaging "geeks", and developing each person for success. Honestly, do the student athletes of SI become a pawn in the exploitation of the athlete who may often be a minority and/or a person of color? Of the ~20 sports SI offers, <u>less than 20% of the sports will actually will utilize the lighting</u>.

Ask why colleges are now allowing athletes to earn money (beyond scholarships) for endorsements from major sporting goods manufacturers? And when will SI follow suit?

4. What is SI really doing? Educating future leaders or exploiting athletic talent for financial gain because less than 1-2% of high school athletes will actually play college sports (DIV I)

http://www.ncaa.org/about/resources/research/estimated-probability-competing-college-athletics

AND
less than 4% of college athletes have a successful professional sports career according to the NCAA (many HS sports have no professional sport equivalent):

http://www.ncaa.org/about/resources/research/estimated-probability-competing-professional-athletics

Does the country need to develop leaders with ethics, honesty, integrity, intelligence, empathy and wisdom or "Gladiators" exploited for sport, entertainment (commercial revenues, TV rights, gambling) and profit/financial gain? Isn't a gladiator really just an athletic slave?

5. What are the values SI, the SF Planning Department and Commission wish to teach SI students vs. what values are they actually demonstrating?

Who's accountable to the ill-equipped former athlete who one day will perhaps be crippled, bankrupt, addicted or potentially imprisoned (O.J.) for failing to emphasize personal value, worth, honesty, integrity and intellect as the foundations for success.

https://steelvalleybankruptcy.wordpress.com/2018/01/05/how-athletes-go-bankrupt-at-an-alarming-rate/
https://www.huffpost.com/entry/pro-athletes-big-winners-_b_5504073

As leaders, elected and appointed officials I, a citizen of SF and a neighbor of SI, look to both myself and to each one of you to consider how our actions, decisions and comments reflect the values, model integrity and demonstrate responsible citizenship to the educators, administration and most importantly to the young and influential minds of the SI student body.

With Kind Regards,

Shirley Recipon
srecipon@comcast.net

—
P.S. Sister to a former Big 10 (Michigan State, class of '84) athlete (women's basketball) who graduated with a major in Mathematics (took five years) and is a healthy, productive and successful citizen. She's the rare exception who also had a 4.0 GPA in high school.

## Horn, Jeffrey (CPC)

**From:** sisunset neighbors <sisunsetneighbors@hotmail.com>
**Sent:** Tuesday, June 09, 2020 2:26 PM
**To:** Horn, Jeffrey (CPC)
**Subject:** For Accela pls: S. Recipon Letter June 8

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***From:*** *Shirley A. Recipon <srecipon@comcast.net>*
**Sent:** Monday, June 8, 2020 11:37 AM
**To:** jeffrey.horn@sfgov.org <jeffrey.horn@sfgov.org>; corey.teague@sfgov.org <corey.teague@sfgov.org>; rich.hillis@sfgov.org <rich.hillis@sfgov.org>; delvin.washington@sfgov.org <delvin.washington@sfgov.org>
**Cc:** joel.koppel@sfgov.org <joel.koppel@sfgov.org>; kathrin.moore@sfgov.org <kathrin.moore@sfgov.org>; sue.diamond@sfgov.org <sue.diamond@sfgov.org>; frank.fung@sfgov.org <frank.fung@sfgov.org>; theresa.imperial@sfgov.org <theresa.imperial@sfgov.org>; milicent.johnson@sfgov.org<milicent.johnson@sfgov.org>
**Subject:** The Numbers Don't Add Up! RE: SI's 90 Foot Athletic Lighting Needs vs. Students' Development

Dear Members of the SF Planning Department and Commissioners,

I'm a neighbor of the Saint Ignatius Preparatory Academy (SI).

I'm also keenly aware of the plans SI is requesting approval of in order to significantly impact the evening lighting, traffic and noise surrounding
the SI athletic fields and adjoining neighborhood residences.

Please find attached for your immediate consideration my heartfelt concern for the neighborhood, the SI students, SI student athletes and the future of each student after high school.
High school is no longer a means to an end but preparation for success in life to open up doors and opportunities in higher education, and citizenship through participation in our Democracy as leaders, advocates and voters.

I appreciate your serious consideration of the points raised and request denial of SI's building permit and petition(s) relating to installation of the Verizon rely system atop 90 feet tall lighting towers.

With Kind Regards,
Shirley

—
**Shirley A. Recipon** | m 1(415)781-9507 | t 1(415)661-1743

## Horn, Jeffrey (CPC)

**From:** Shirley Yee <shirlcyee@gmail.com>
**Sent:** Tuesday, May 05, 2020 8:11 AM
**To:** Horn, Jeffrey (CPC); Teague, Corey (CPC); Hillis, Rich (CPC); Washington, Delvin (CPC)
**Subject:** Stop St. Ignatius Stadium Lights

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

Dear San Francisco Planning Department,

My name is Shirley Yee and I live with my husband and two kids in the Sunset District at 2155 39th Avenue. Our house is directly across the street from St. Ignatius High School's (SI) football field.

SI's proposal to install four (4) 90-ft. permanent stadium lights in their football field will directly and negatively impact our quality of life. Not only will their illumination shine into our homes (our bedroom fronts 39th Avenue), but the noise from the night games will be intrusive. Our two elementary school-aged children have early bedtimes, well before most of the night activities planned for the stadium lights will end.

Such lights have no place in a residential neighborhood. They will rise more than three times the height of standard street lights and almost five times the height of most of the single-family homes in the area. Besides the noise and light pollution issues, the lights themselves will be an eyesore.

On April 29, 2020, SI held a virtual meeting required by the Planning Department. Although the meeting was set for an hour, Tom Murphy from SI, ended the meeting 20 minutes early without addressing any of the questions posted in the chat or unmuting any of the residents in attendance. It was a one-sided meeting where SI was able to do their presentation without having to answer to any of the neighbors. **SI should be required to hold another neighborhood meeting when the shelter-in-place order is lifted.**

As the Verizon representative said during the virtual meeting, there is no reason the Verizon antenna needs to be installed on the proposed 90-ft. stadium lights. Verizon's equipment installation project should be kept separate from the stadium lights installation.

It's obvious the stadium lights are important to SI to attract students. Any benefits accrue to SI only, not the neighborhood. In fact, the noise and traffic generated by the events held at the school will be disruptive to the lives of our community. SI should have never received a Categorical Exemption in their CEQA determination as the use of the football field at the school will change with the addition of the stadium lights.

**I ask for your help in stopping SI from installing the proposed stadium lights** and would be happy to discuss our concerns with you. Thank you for your consideration.

Sincerely,

Shirley Yee

From:Seiko Grant

2931 Rivera St.

San Francisco, CA 94116

05/01/20

To: SF Planning Dept.

1650 Mission St

San Francisco, CA 94103

Re: Night Lighting at Saint Ignatius College Preparatory

Dear Commissioners,

My name is Seiko Grant and I have lived in the Sunset District for 56 years, 53 of those in my current home at 2931 Rivera St. During this time I watched Saint Ignatius College Preparatory (SI) high school being built and transition from an all-boys to a co-ed school. The residents adjusted to the increasing traffic,parking issues and weekend noise from events at the J.B Murphy field. We could always depend on a return to quiet streets in the evening after a full day of work and to get to sleep in preparation for the next day. This is a basic condition that everyone, including all of you on this commission,needs for a healthy existence.This is why we chose to invest our money and spend our lives here. Our homes provide a space to rest and gather comfort. Our neighborhood is a source of support and safety.We feel very fortunate.

Saint Ignatius College Preparatory school (SI) is planning to install permanent night time stadium lighting on J.B Murphy field using LED lighting on poles rising 90' high. They anticipate use of the lights for over 150 nights a year and until 10:00 pm in most cases.The administration at SI have not been forthcoming about the specifics of this proposal. Details have been changing in every announcement ( initially they stated only 10 night events a year) and emerging sporadically. Though legally required meetings have been held and advisory notices distributed, feedback from residents affected by this plan is not given much weight as this project is considered by SI as destined to be completed according to their wishes. In enlisting a telecommunications provider, Verizon Wireless,to install a series of antennas to one of the proposed 90' light poles, the project may be considered an essential service and thus fast-tracked even during the shelter-in-place order. One of graphics, presented by the Verizon representative to demonstrate how the proposed installation would remedy a lack of coverage to access wireless services, revealed that only the baseball fields at West Sunset recreation area and part of Sunset Blvd had less coverage. The Ortega library and neighboring homes have very good wireless connections and nothing additional is needed in the open fields.

Light pollution,noise pollution and increased traffic to the extent that they would significantly effect living conditions for a large number of residents and avian life in the area surrounding the J.B.Murphy field are of great concern. A thorough investigation into these effects including a full environmental review in accordance with the California Environmental Quality Act must be conducted. I strongly object to the exemption from environmental review. On the one hand, in the conditional use application, SI states that " Traffic will not be increased, as persons already attending the school will use the field." In the project application, they state that " The lights bring people to the neighborhood.." and " the field is used by a variety of non-profit institutions…". These conflicting statements must be resolved. A greater number of night events will definitely increase traffic.

One reasoning for SI wanting to go forward with this project as stated by their representative,

Mr. Tom Murphy, in the online meeting of 4/30/20 is to allow a later start time of the school day quoting studies showing later sleep cycles for teenagers. Again in the project application ,"..providing greater opportunities for students to have adequate sleep." Mr. Murphy also mentioned that night games during the week will allow those families to have weekends free and reduce traffic on Saturday. Would that they have as much concern for the weekends and sleep time of the neighborhood residents to whom they say they want to be good neighbors. The enhanced educational experience desired by SI would be better served by teaching the students time management and that participation in extra curricular activities require adjustments which may not always be convenient.

There is no other school in San Francisco, public or private, which has lighted fields on their campus. All those schools continue to provide excellent educational experiences without negatively disrupting the lives of the neighborhood. There was no discussion or questions allowed at this meeting that were not "related to the project". I consider the concerns of the residents living around the field directly related to the project.

Any other parks in San Francisco with night lighting are open for use by the general public.

The "expanded use of existing open space" at J.B. Murphy field is restricted to the students/families of SI. The cost, including reduced property values, will be borne by the entire neighborhood. I object to the proposed night lighting on the fields at Saint Ignatius College Preparatory and request that this commission decline to approve this project.

Sincerely,

Seiko Grant

Dear Planning Commissioners,

This is a letter on behalf of the Sunset Community Garden, which is located directly north of S.I.'s campus, on 37th Avenue at Pacheco. We are opposed to this project and we ask you to not allow the installation of the nighttime stadium light and cell antennas in this residential neighborhood. Our garden is a natural oasis in our concrete jungle known as San Francisco and we are so lucky that we have it available for our use. We want to keep this area as pristine as it is. It truly is a clean, fresh air oasis surrounded by wonderful trees and nature, and is teeming with birds, bats, butterflies and honeybees. Please don't let the lights negatively impact the natural environment in this area. Think about how your action will be effecting environmental justice. Climate change is upon us all and this quiet community by the sea does not need any more carbon depleting pollution from the lights and car exhausts from the outside area. The ball field has operated without these glaring lights for many years and the games went on.

We are one of the oldest Community Gardens in San Francisco, which started during the Victory Garden era of World War II. We have 54 plots (over a hundred members or more), are free of charge, and are comprised of a very diverse community of gardeners (a large Asian population with many countries from all over the world represented), over 50% of which are retirees on fixed low incomes and don't speak English. Our oldest gardener Lilly Wong is in her 90s and we have families with young children in the Garden as well.

We are a direct next-door-neighbor of S.I., however S.I. never contacted us to inform us about the stadium light project or to ask us about our concerns. We only recently learned about it, through one of our members. At a recent Zoom meeting, our Garden members were very *unhappy* (enraged, disappointed, upset!) about the proposed project and felt disregarded by S.I. The lights at night will disturb the natural balance in the vicinity of the garden and will bring more parking congestion and trash near the gate of the Garden on 37th Ave. We know that crowds attracted to nighttime games (including opposing team's fans) will bring more vandals hopping the fence into the garden and damaging plots and overturning garden furniture, etc., which we have already experienced too much of.

Please consider our needs as an important part of the Community and do not allow these lights and cell antennas. They are detrimental to our Garden and offer no benefit to the Garden Community. Please do not threaten this safe and beautiful place, particularly for the sake of our senior members.

Sincerely,
Lance Mellon Coordinator

Sunset Community Garden

## Horn, Jeffrey (CPC)

**From:** Teo Manzo <teo.a.manzo@gmail.com>
**Sent:** Monday, June 08, 2020 2:16 PM
**To:** Horn, Jeffrey (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Diamond, Susan (CPC); Fung, Frank (CPC); Imperial, Theresa (CPC); Johnson, Milicent (CPC); Mar, Gordon (BOS); Marstaff (BOS); CPC-Commissions Secretary
**Subject:** SI Lights

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

Dear San Francisco Planning Department,

My name is Teo Manzo I am a sophomore at George Washinton high school. I live right down the block from Saint Ignatius. Almost every day (Pre Covid-19) I come home to seeing SI athletes using a hill of Quintara street between 39th and 40th Ave as a hill to run-up as an exercise. They will continually run-up all while the coaches are screaming and yelling. To me, this isn't a huge problem while loud and sometimes annoying this is the least of my concerns. After that, the soccer practices would start and go on until around 6 or 7. Then it finally becomes peaceful, however, if SI were to build these lights that all changes. SI football games are already loud from the announcers and cheering. If this were to happen at night it would be exponentially more annoying. Combined with the aspects of partying at night, teens drinking, smoking (I've seen this happen before at SI and at my own school's football games so I know for a fact that this would happen here) and garbage. That would make things even worse with this happening 3 times a week. So please do take this letter into consideration when you make the verdict and understand the burden you would be putting on us neighbors of SI before approving this project.

Thank you for reading

-Teo Manzo

## Horn, Jeffrey (CPC)

**From:** Tiffany Pavon <tiffanypavon@gmail.com>
**Sent:** Tuesday, June 09, 2020 7:46 PM
**To:** Horn, Jeffrey (CPC); Teague, Corey (CPC); Hillis, Rich (CPC); Washington, Delvin (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Diamond, Susan (CPC); Fung, Frank (CPC); Imperial, Theresa (CPC); Johnson, Milicent (CPC)
**Cc:** sisunsetneighbors@hotmail.com
**Subject:** Letter Regarding SI

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

We are the Pavon Family and live in the Sunset District at 2175 39th Ave.

Saint Ignatius (S.I.) is planning to install permanent nighttime stadium lighting on their football field. These LED lights will rise 90 feet above the field which is located in our own residential neighborhood.

SI is proposing these stadium lights to be in use for over 200 nights a year and up until 10 pm. This is a residential neighborhood.

As I live directly across the street from the field with my family that includes a 12-year-old. This will disrupt our life beyond what is acceptable. Most of these homes have bedrooms in the front directly facing the field and with lights, games, noise, traffic etc our right to quiet enjoinment is at stake.

Having more events and lights and noise that go until 10pm weekdays is just not feasible. On a regular game day, we already have issues with traffic, double parking, blocked driveways, noise and safety. Leaving our home on game days is extremely difficult with our driveway constantly being blocked and double-parked cars making it difficult or even impossible to leave our own home. Add to this nighttime games with loitering and people gathering after games this will create a noise and safety problem in our neighborhood.

We as neighbors have reported our issues to SI just to get brushed aside. We are a residential neighborhood and there is Absolutely no reason that the city should allow this to proceed.

SI is a private school that this will only benefit them and and not the neighborhood or city, this will use our city resources more- police, garbage, MTA etc, stretching it thin and taking away from our neighborhood safety.

39th Ave and Rivera are bus lines and during games busses have to go around double parked cars creating dangerous conditions for drivers, riders, pedestrians and neighbors.

++++The project has been renamed as a Verizon wireless project when it is actually a project to install 4 Permanent Stadium Lights with massive impact on our neighborhood

The meeting was shut down by SI -20 minutes early without any of the neighbors ever taken off mute and without any discussion.

It appears that SI is taking advantage of the current virus and the need for remote meetings to mute their neighbor’s ability to ask questions and voice concerns.
They couldn't MUTE us in an actual in-person neighborhood meeting during normal times.

The Pavon Family

**rom:** Timothy Brey <tbreyehs@gmail.com>
**Date:** May 6, 2020 at 10:59:21 AM PDT
**To:** joel.koppel@sfgov.org
**Cc:** marstaff@sfgov.org
**Subject: Record No. 2018-012648CUA: 2001 37th Avenue / Koppel**

# Record No. 2018-012648CUA: 2001 37th Avenue / Koppel

Hello Commissioner Koppel,

**I am writing to express my disapproval for the Ignatian Corporation's request to install 90 foot lighting fixtures on the JB Murphy field.**

**The request for Cellular Service Antenna (so deemed essential) should be a separate application from change of use with lighting.**

According to Dun & Bradstreet, "The Ignatian Corporation is part of the Private Schools K-12 Industry, generates 39.31 millions in sales (USD)."

Saint Ignatius is a private entity with a school tuition of $26,000, is not a public institution and does not provide any public services to the local Sunset community.

**The Ignatian Corporation's Master Plan stated rationale of the need for lights is a joke. They claim the need for lighting due to the hardship in having 66 teams competing for use of the "facility" which again is not the Sunset neighborhood's problem and is also disingenuous since out of the 15 sports, 10 do not use the JB Murphy field (basketball, volleyball, golf, cross country, tennis, waterpolo, rowing, softball, swim & diving, baseball). Again, a private entity that wants to offer it's exclusive clientele a "sports night club" at the expense of the community.**

The claim that "it will have no impact on traffic and parking" is simply not true. Increased time/use of the field logically means more impact on traffic and parking.
They profess how their lights will be newer technology etc. than what was installed at the South Sunset and Beach Chalet fields. This is a misdirection, since they neglect to state that both South Sunset and Beach Chalet are public fields, both of which I have had the pleasure to practice evening soccer with my daughter over the past years. We San Franciscans derive no such benefit from SI's light installation, only a socialization of costs for private benefit.

I note that the City's Planning Code Section 101.1(b) establishes eight priority-planning policies and requires projects to comply with said policies.
Two of the policies clearly are not being adhered to if the commission allows the installation of 90 foot light towers and use of the field until 10 pm.

(2) **That existing housing and neighborhood character be conserved and protected in order to preserve the cultural** and economic diversity of our neighborhoods;

Residents have come to terms with the regular day-time use of the competitive sports programs of Saint Ignatius, including the noise from crowds and the PA system. Day use includes early morning practices with coaches blowing whistles and teams chanting. I have no reasonable objection to this. This neighborhood is zoned single family residential, but this radical change in use (lighting until 10 pm) will burden all neighbors with increases in parking, traffic, noise and light pollution. Lighting on the field and the use of the field until 10 pm will change the character of this neighborhood forever, in a negative way.

**(8) That our parks and open space and their access to sunlight and vistas** be protected from development.

I have come to refer to our neighborhood as the "Big Block," composed of Saint Ignatius, West Sunset Fields, Sunset Elementary, Ortega Park and Library, and AP Giannini. It is truly unique in that all the power lines, phone and cable lines are buried, leaving a spacious and clean appearance. The vistas looking out from various points in the neighborhood towards the Pacific and up towards Mt. Tamalpais are marvelous. Having 90 foot light poles will degrade these views. Point 8 mentions "sunlight," a shame it doesn't also include "night sky" as the light pollution would only degrade the areas night sky.

Commercial Enterprise - Saint Ignatius has historically and regularly rented 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, to name but a few. These are commercial operations that the further impact the neighborhood. With new lighting, the Ignatian Corporation will likely continue to rent out the field to private groups, allowing themselves to gain more at the public expense.

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.

**If the JB Murphy field were a public park/field, the lights would benefit all people, not just a select few.**

No other high schools (public or private) in SF have lighting and there's no reason to start such a trend. There are other fields available for special events or final matches that could be used. Or, Saint Ignatius should continue to utilize rental lights for limited events or special games.

I would hope the SF Planning will act in the interest of the neighbors and public by denying the Ignatian Corporation's (Saint Ignatius College Preperatory High School) request for lighting.

It is really a shame to hold this virtual hearing when many residents do not have the technological savvy to participate, that's not democracy. This is yet another reason to separate the cellular antennas from the lighting installation/use application.

Finally, can you tell me what critical elements you will be considering when looking at this proposal and if you can separate out the need for cellular coverage from lighting for sports? Can you rule for the essential service from the non-essential (which burdens the neighborhood and public)?

Thank You,

Tim Brey
2831 Rivera Street
**San Francisco, CA 94116**

## Horn, Jeffrey (CPC)

**From:** Una Fitzsimons <unafitzsimons11@gmail.com>
**Sent:** Wednesday, May 06, 2020 1:21 PM
**To:** Horn, Jeffrey (CPC)
**Subject:** 2018-012648CUA Saint Ignatius field lights/cell tower

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

May 5, 2020

Re: 2018-012648CUA Saint Ignatius Field Lights and cell tower

Dear Jeffrey Horn,

I am writing to express my disapproval and anger at Saint Ignatius' rush to push through their lighting project under the guise of essential business due to the cell tower project connected with the lighting.

We are still dealing with shelter in place orders during an unprecedented pandemic! You and your colleagues aren't even in your offices. We can't physically congregate/meet with our neighbors to discuss this. Why is this happening now? This is not very democratic. Many neighbors are not technologically savvy and thus can not attend virtual meetings and will not get to have their voice heard.

Saint Ignatius had a "community" meeting on April 29 where they had a representative from the lighting company and a rep from Verizon talk at the 100 people present on the Zoom call, but never answered any of the questions or concerns presented by neighbors at the meeting or allowed any feedback. In fact, the community was on mute the whole time! It was a master class in spin, not in listening to or reviewing the community's concerns. They even ended the "meeting" 20 minutes early!! They revealed they aren't dealing in good faith with their neighbors; they just want their project fast-tracked. How are they able to behave this way and ignore the community (when they are part of this community and benefit from being in this community)? Their lighting project will most definitely adversely affect the neighborhood.

Saint Ignatius is a private entity which generated $39 million in sales/tuition last year; they also are exempted from 96% of their property taxes. Why can't they put the cell tower on their roof with the other one they have? Certainly they have the money and resources (as indicated by the scale of this project). SI claims their 90 foot lights and evening schedule of 150 nights/year until 10 pm won't have an impact on traffic, parking, and noise. This is not like Beach Chalet or South Sunset Fields because SI is private and the community derives no benefit from this project! It's not open to the public. All the benefit is theirs; all the costs in noise, light pollution, increased traffic (especially during games), and increased parking is ours. How is this being a good neighbor?

SI claims hardship in that they have 66 teams competing for the field space. Many of their sports programs do not even use the field (basketball, volleyball,golf, cross country, tennis, waterpolo, rowing, softball, swim and diving, and baseball). Why should the community (through the impact of traffic, light pollution, noise and parking) have to suffer because they need more time for their teams on the field? No other high school in the city has lights (for late night practices). Why does SI get an exemption? A few years ago SI admitted that at least 40% of their student body drive in from areas outside of San Francisco. That's a lot of extra cars here every day and (if this goes through) every night!

This project constitutes a change in use of their field. Where is the CEQA study/review of light pollution, parking, and traffic from this new night-time usage? My family and I live directly across the street from SI. We expect the daily

deluge of student parking and traffic, but extending usage with the lights until 10 pm will definitely have a negative impact on all of our neighbors' quality of life. SI is lying when they state that there will be "no impact on parking and traffic" with this new project. Anyone with a brain will tell you that of course there will be an impact on parking and traffic, especially on game nights/events throughout the year.

Saint Ignatius' lighting project violates compliance point 2 and point 8 of the City's Master Plan policies:

That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.

That our parks and open spaces and their access to sunlight and vistas be protected from development

The lighting of the field and night-time usage which will increase traffic, parking, noise, and light pollution will negatively impact and change the character of our neighborhood. The outer Sunset is mainly residential and quiet. This project does not comply with the character of our neighborhood. Our neighborhood (around the block of SI, West Sunset Fields, Ortega Park, and AP Giannini) has all the power lines and poles buried, leaving a unique and unobstructed view all the way across to the Marin Headlands! It's a rarity in the city and these proposed lights would definitely change that. We need to protect this unique character of our neighborhood.

Saint Ignatius currently rents out their field on the weekends and early evenings. SF Elite Academy soccer team, pee wee football, and adult league ultimate frisbee teams have used it on different occasions in the early evenings and weekends. SI says they do not "rent" it out, but perhaps they receive a donation instead. They are a private corporation and we have no access to their agreements. We have no way to hold them accountable!!! In essence, they operate a commercial enterprise as relates to their field and this will continue apace with lights. Our neighborhood is residential; we don't need a private night-time sports club operating until 10 pm every night! That will change the character of our neighborhood.

SI is private and benefits a small cadre of students who attend, many of whom do not even live in the city. We have no way to hold them accountable regarding the night-time use of their field. We have no way to hold them accountable for anything. We need you to hold them accountable and say no to this project! It is NOT in the public interest. This project is only in the (private) interests of SI and the resulting increase in traffic, noise, light pollution, and parking must be borne by the neighborhood.

So, I ask you, what exactly is the public benefit of 90 foot field lights on until 10pm 150 nights a year? Again, how is this project in keeping with the character of the neighborhood? How is SI being a good neighbor here?

This seems like a very good example of what is known as privatizing the benefits and socializing the costs. The upside is all SI's. There is no public good here. This project must not go forward. It is not in the public interest. Thank you.

SIncerely,

Una Fitzsimons
2831 Rivera St.
SF, CA 94116

My name is Vicki Tomola and I live in the Sunset District at 2135 39th Ave,

Background

Saint Ignatius (S.I.) is planning to install permanent night time stadium lighting on their football field. These LED lights will rise 90 feet above the field which is located in our own residential neighborhood.

SI is proposing these stadium lights to be in use for over 150 nights a year and until 10 pm for most events.

Despite the current COVID-19 crises, Saint Ignatius has been able to move this project forward over the next few weeks because one of their stadium light towers will hold Verizon wireless antennas and during this crisis. Despite the fact that SI already has existing cell installations on their campus buildings.

During our current stay at home orders, SI is trying to sneak their giant stadium lighting project through the planning process quickly and with as little attention from neighbors and our city officials

SI is not acting in good faith or as good neighbors - trying to slip this through when no one is paying attention.

The project has been renamed as a Verizon only wireless project when it is actually a project to install 4 Permanent Stadium Lights on the SI football field with a disruptivese impact on our neighborhood

If states can delay elections, if major events are cancelled, when people are dying, and we're all distracted - why is SI allowed to push this project through when it will have such huge effect on the neighborhood and neighbors.

SI is currently closed, has no sports activities for the foreseeable future - why the rush to install these stadium lights now?

Some of our neighbors are first responders and don't have time to pay attention to stadium lighting.

This project has no pubic value - it is for private SI usage only yet it will have a direct affect on the public - our neighborhood

It's not just about the equipment (lights & cell tower) It's about how the night activities will affect and disrupt our neighborhood evenings. Your attempt to disrupt our neighborhood without our voices heard continues to show your total disrespect for us. You have continued to take advantage, for 30+ years now, by not supplying any parking on your property for the overwhelming number of student drivers you have.

Many of us bought our homes with full awareness of SI having weekday/weekend activities during the DAY TIME- but to extend that into the evenings is new and unacceptable.

<u>The Meeting - Frustration</u>

Saint Ignatius and Verizon had their SF Planning required meeting yesterday remotely by Zoom and phone in

They MUTED everyone but themselves and proceeded to present the project - lights and Verizon antenna.

Only a few of our questions to SI were answered and the rest ignored.

Tom Murphy from SI refused to answer the majority of our questions because they are "not applicable to the project"

The meeting was shut down by SI -- 20 minutes early without any of the neighbors ever taken off mute and without any discussion.

SI/Verizon should not be allowed to MUTE their neighbors in a meeting required by SF Planning

It appears that SI is taking advantage of the current virus and the need for remote meetings to mute their neighbors ability to ask questions and voice concerns.

They couldn't MUTE us in an actual in-person neighborhood meeting during normal times.

SI claims to be a good neighbor -- this meeting was not conducted by a good neighbor.

I am so outraged at this SI institution and how they think they can do whatever they please with no consideration for the residents of this neighborhood, this behavior by this institution has been like this for 30+ years now. We have had enough!!

This institution has yet to supply a parking lot/ structure to accommodate the overwhelming number of student drivers, most likely not even SF residents. The parking was never an issue when this school first opened.

Now you want to disrupt our neighborhood even more with night lighting shinning into our bedrooms and living rooms, noise and continued parking issues long past the end of the school day for almost half the year. This is NOT ACCEPTABLE!!!

Now this institution wants to place the residents and their children at risk to the possible exposure to electromagnetic waves from cell tower/antenna equipment. Our health, our children's health, young children playing sport nearby could be at risk. For who's benefit? For pure greed by two institutions, selfish SI and corporate Verizon, not at all about what is best for the community.

The City is supposed to be a democratic community, one that will listen and take to heart what the people want, what the people in this neighborhood want, what they and their children deserve to live in this community.

Longtime Resident,
Vicki Tomola

## Horn, Jeffrey (CPC)

**From:** 夏莲徐 <xuxialian@gmail.com>
**Sent:** Monday, June 08, 2020 10:25 PM
**To:** Horn, Jeffrey (CPC)
**Subject:** Oppose to Saint Ignatius stadium light project

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

Dear Jeff,

My name is Xialian Xu, and I live in the Sunset District at 2123, 40th Ave, San Francisco.

Saint Ignatius (S.I.) is planning to install permanent night time stadium lighting on their football field. These LED lights will rise 90 feet above the field which is located in our own residential neighborhood.

One of the light poles will hold a 5G Verizon wireless antenna

SI is proposing these stadium lights to be in use for 200 nights a year and until 10 pm for many events.

It's not just about the equipment (lights & cell tower) It's about how the night activities will affect and disrupt our neighborhood evenings. Noise, traffic, difficulty to find a parking space in the neighborhood. This is a residential area but not a commercial area. We need to rest after a day's work and our kids need to go to sleep on time!

The majority of their proposed light use is for practices however SI already has a practice field with lights on 37th Ave

Saint Ignatius has been able to move this project ahead because one of their stadium light towers will hold a 5G Verizon wireless antenna which is considered an essential project during this crisis. SI already has cell installations on their campus buildings.

The SI stadium light project has been renamed as a Verizon wireless project when it is actually a project to install 4 Permanent Stadium Lights which will have a negative impact on our neighborhood evenings

This project has no pubic value - it is for private SI usage only -- yet it will have a direct affect on the public - our neighborhood

Many of us bought our homes with full awareness of SI having weekday/weekend activities during the day time - but to extend that into the evenings is new and unacceptable.

Please consider our voices-------- We oppose to Saint Ignatius stadium light project!

Thank you very much!

Sincerely,

Xialian Xu

# ATTACHMENT 4

# NEIGHBOR OPPOSITION LETTERS TO DISTRICT 4 SUPERVISOR 2015

**August 24, 2015**

**RE: <u>SI'S PLANNED PERMANENT LIGHTS ERECTION/INSTALLATION ON ITS ATHLETIC FIELD AT 39TH AVENUE AND RIVERA STREET</u>**

**TO WHOM THIS MAY CONCERN:**

This letter is to register our strong opposition to the proposed erection by St. Ignatius Preparatory of a permanent lighting system on its athletic field at 39th Avenue and Rivera Street in San Francisco, CA 94116.

We honestly believe that its installation and operation would eventually cause harm to, and endanger the safety of, the nearby residents in this area with the noise, litter, parking problems, tremendous traffic and possible radiation exposures it could generate.

Hence, our strong and vehement opposition to this plan.

Thank you.

Vic Aguirre
Affected Area Resident
2183 39th Avenue
San Francisco, CA 94116

2179 40th Avenue
San Francisco, CA 94116
8/24/15

District 4 Supervisor Katy Tang
Saint Ignatius Principal, Patrick Ruff

Dear Supervisor Tang and Mr. Ruff:

As a 30-year resident of this neighborhood, I am writing to express my concerns about the plans that SI has for installing lighting for their ball fields and for the proposed construction and installation of taller cell towers.

I am strongly opposed to SI holding night games on their fields. Currently during the school day, there is a great deal of noise and traffic. It is difficult for the residents and our guests to find parking on our streets. I have asked students not to park in my driveway and have been told that they were late for school and that they weren't going to move their cars. There have been multiple accidents in the intersection by my house, caused by students or parents. I understand that many of your students commute from outside the city and that public transportation my not be the most efficient commute option. But during game time it is always much worse. Your students, their friends and families are often double and triple parked. Due to the parking issues, the 48 Quintara bus has had to be rerouted off 39th Avenue during games. Our driveways are blocked. This is bad enough during the day games. But to expect us to put up with this at night is unreasonable. It is a real problem for our quiet and safe neighborhood.

There are other issues that also arise during your games. The loudspeakers are very intrusive. It is easy to hear all announcements, even with my windows closed. It interferes with sleeping and with the quiet enjoyment of our homes. We do not broadcast during school hours while your students are in class. I would expect the same from any other good neighbor.

I am also very concerned about the proposed construction and installation of cell towers. I don't see these plans as doing anything to address the current problems in our neighborhood and will just exacerbate these issues.

We have families with small children who need to sleep, adults that need to go to work the next morning and seniors who shouldn't have to tolerate this disruption. We expect to be able to enjoy our evenings without the intrusion of lights, loudspeakers, traffic and we expect to be safe when we to drive on our streets.

Thank you for your consideration.

Dr. Anne Marie Benfatto

To: HONORABLE PATRICK RUFF. I AM IN A WHEELCHAIR

I would like to speak to the issue that the pedestrian around SI CP are NOT SAFE AND at times it is more dangerous than other times. Parents buy these RETRO MUSCLE CARS for their sons (sometimes daughters) — which are driven at an unsafe speed - they ignore the rights of pedistrians & break traffic code laws - they also park in residents driveways (greater than 18") - parking sticker indicates they are SI students. Please SIR RUFF - We are just working people here in the sunset district - We are not strong enough to fight these RICH people who have been slowly encroaching into our living areas. PLEASE HELP US

SINCERELY

JAMES R. Clark USMC Ret.
2194 40th AVE.
S.F. 94116

Hi! I am not able to attend the Tuesday evening meeting, but I really would not like to see night field lights on at Saint Ignatius. I live right across the street and my 2 bedrooms face the field. Actually I would like more info on how long the lights would be on and how often. Parking is already an issue when there are games - Thanks,

Linda C. Delucchi

LINDA C. DELUCCHI, 2131-39th Ave, 415 247-8084

A.M.D.G.

To whom it may Concern @
Saint Ignatius College Prep. High School

It has come to my attention that you will be installing lites and having nite games at the ball field.
Enough is enough. This High School has stepped on the toes of this neighborhood since 1970. Parking is ridiculus around here. The students regard for the neighbors is not the way it should be for a Catholic High School. The constant amount of people betwee S.I. and the West Sunset playground both in noise and parking has gotten out of hand and you want to make it go into the evening now. So it will be from 8am to 8pm if you get your way. How would you as a S.I. president like to live here.

I will stand in the way of this, and also push for neighborhood Parking permits for property owners in the neighborhood if this goes thru.

Yours, D.F. Dooling Class of 1969.
Ashamed of being a S.I. Alumni.
And am glad to be from the OLD School where they were easy on the neighbors on Stanyan St.

To: Supervisor Tang
St. Ignacious Principal Ruff

From: Carole Gilbert
2179 40th Ave.

I am writing this letter to you both in order to express my concern about your plan to install 90-foot lights on your playing field for the purpose of holding night games at your school.

I have lived in my home since 1984 and have experienced the growth of your school and how it has slowly encroached on our quiet family neighborhood.

Below are just some of the issues this neighborhood currently faces during daytime/weekend events:

1. Day time parking is taken up by your ever-increasing student population.
2. Your after school sports programs have continuously caused traffic issues. Students, parents and game attendees frequently double park.
3. Students stand in the middle of the street talking to friends in double-parked cars, which causes traffic problems and great safety issues.
4. During these times the 48 Quintara Muni bus is unable to make the turn onto 39 Avenue. They are forced to change their route and drive down 40th Avenue in order to continue serving the people of this neighborhood. This practice must stop because it is against Muni regulations to change their route.
5. People continuously block our driveways during these daytime games as well as during regular school hours.
6. There are no parking and traffic officers here to monitor these events.
7.Your loud speakers are extremely loud. I can hear every word as clear as if it were being said inside my house, which is 2 blocks away.

Once you start playing and practicing at night these issues will only multiply. We chose to live here because this is a neighborhood of quite single-family homes. We are families who work and have children. We

Hi Katy and Patrick,

I am representing the house of 2127 40th Ave and 2146 40th Ave. My family is living in 2146 and my father is living in 2127. My family and my father are **opposed** to build a permanent lights on the athletic field at Saint Ignatius School. The light will be too bright that would affect my family to fall asleep and it will create a lot of noise and parking problem. In addition, it will bring more stranger to my neighborhood at the night time which is not acceptable. I wish you will understand our concern and do not build a permanent lights in the athletic field.

Any further concern, please contact me at Coral_ho@hotmail.com.

Coral Ho

25 August 2015

August 25, 2015

Re: Proposed lights at Saint Ignatius Athletic Field

To whom it may concern:

We have lived on 40th Ave, one block away from college prep school Saint Ignatius for our whole lives. For many school years, we have tolerated the loud students driving fast around our block, blocking our driveways because they were desperate to find parking, and stopping for unexpected students running across the street when school is out or in session.

We strongly oppose the addition of field lights for night games because we fear our neighborhood will get flooded with cars and littered after football games. We like to come home to easily find parking. We don't want our houses lit up from the bright lights of the games when we try to wind down from our busy days.

It may not be apparent to any SI faculty member or it might be, but these students are very careless and unapologetic to the way they are in our neighborhood. On several occasions, we've seen kids nearly hanging out of a car because their friends were driving them to their car parked on our block. In addition to being very dangerous, it is all disturbing the peace because they have their music blasting while driving up and down the streets. On another occasion, we noticed a team member changing outside of his car out in the open. I can't even begin to tell you the ongoing problem of blocking our driveways. It's endless and to open this up to our nights would just be a nightmare.

Our neighborhood community needs to be highly considered when thinking about installing proposed lights for night games. If you were living here, how would you feel? That's a question we propose to you. We chose to live here in the Sunset district for its quiet and pleasant atmosphere. Putting up the lights would destroy that feeling and put us in misery having to deal with weekly or nightly games and the flood of SI students and their families or friends parking in our neighborhood.

Regards,
Hom Family
2170 - 40th Avenue

8/31/2015

SUPERVISOR KATY TANG
CITY HALL
SAN FRANCISCO 94102

DEAR SUPERVISOR TANG,

FIRST I WISH TO THANK YOU FOR ATTENDING OUR NEIGHBORHOOD GATHERING AND LISTENING TO THE CONCERNS OF THE RESIDENTS.

I DO HOWEVER, WANT TO REITERATE THAT I HAVE SPOKEN WITH OVER 100 PEOPLE IN THE AREA ABOUT SAINT IGNATIUS' INTENTION TO LIGHT THEIR ATHLETIC FIELD. OF THAT 100 ONLY ONE FAVORED THE LIGHTS AND ONE OTHER DIDN'T CARE ONE WAY OR THE OTHER. IN RESPONSE TO MY QUESTION "WOULD YOU HELP US STOP S.I.'S EFFORTS", YOU RESPONDED THAT YOU HAVE TO CONSIDER THE FACT THAT YOU HAVE HEARD FROM SOME WHO WANT THE FIELD LIGHTED.

I'M CERTAIN THAT YOU ARE AWARE, THAT S.I. HAS ENORMOUS RESOURCES AVAILABLE FAR AND ABOVE WHAT THE AREA CITIZENS HAVE. S.I. HAS THE ABILITY TO GENERATE MANY CALLS, LETTERS AND E-MAILS FROM ALUMNI, PARENTS AND STUDENTS WHO DO NOT LIVE NEAR 39 AVE & RIVERA AND

WOULD NOT WANT IT NEAR THEIR HOMES.

IF S.I. FAILS IN THEIR SCHEME THEIR SUPPORTERS WILL SHRUG IT OFF AS THEY HAVE GOTTEN ALONG WITHOUT FOR OVER 40 YEARS.

ON THE OTHER HAND IF S.I. SUCCEEDS THERE WILL BE ANGER AND ENMITY THAT WILL LAST FOR YEARS. THAT CANNOT BE HEALTHY FOR ANYONE.

IN ADDITION, IMAGINE ALL OF THE PROBLEMS OCCURRING AFTER DARK WHEN SOME PEOPLE HAVE HAD A COCKTAIL OR TWO. IF SOMETHING CAN HAPPEN – IT WILL.

IT IS MY SINCERE HOPE THAT S.I. WILL WITHDRAW THEIR PLANS. IF NOT WE PRAY THAT WISER AUTHORITIES WILL STOP S.I. FROM IMPOSING CONDITIONS WHICH WILL SEVERLY DISRUPT THE EVENING FAMILY LIVES OF THIER NEIGHBORS.

IT IS DIFFICULT FOR ME TO RECONCILE THE S.I. MOTTO A.M.D.G. LATIN FOR "FOR THE GREATER GLORY OF GOD" WITH WHAT S.I. WANTS TO DO TO THEIR NEIGHBORS.

SINCERELY

Jack Allen

PS GOT YOUR VOICE MAIL THANKS

9/4/2014

SUPERVISOR TANG
CITY HALL
SAN FRANCISCO 94116

DEAR SUPERVISOR TANG,

I CONTINUE TO THINK ABOUT WHAT YOU SAID ABOUT HAVING HEARD FROM SOME WHO WOULD LIKE THE SAINT IGNATIUS (S.I.) ATHLETIC FIELD LIGHTED FOR NIGHT PRACTICES AND GAMES.

THE POLICE ARE HIRED TO PROTECT ALL CITIZENS BUT WHEN ONE PERSON ATTACKS ANOTHER WE EXPECT THE POLICE TO INTERVENE ON BEHALF OF THE ONE BEING ATTACKED.

WE APPRECIATE THE DIFFICULTY OF OUR ELECTED OFFICALS IN THEIR EFFORTS TO BALANCE THE CONFLICTING DESIRES OF THEIR CONSTITUENTS, BUT S.I. WILL NOT BE HARMED WITHOUT THE LIGHTS. ON THE OTHER HAND THE AREA RESIDENTS WILL SUFFER GREATLY FROM NOW ON IF S.I. IS PERMITTED TO HAVE THEIR WAY.

THERE IS NO QUESTION THAT S.I.'S PLAN IS AN ATTACK ON THEIR NEIGHBORS.

WE HOPE FOR YOUR SUPPORT IN THIS MATTER.

SINCERELY,
Jack Allen

Nina & Jay Manzo
3025 Quintara Street
San Francisco, CA 94116
415-661-8583

August 24, 2015

Re: Proposed Lighting at St. Ignatius Fields

To Whom it May Concern:

We are opposed to the proposed lighting plans at the St. Ignatius Fields and respectfully request that St. Ignatius abandon plans for field lighting. As a family with young children, my husband and I already experience much impact from the S.I. students on our street, in our front yard and driveway, particularly with the daily parking overload of students on Quintara Street during the school year.

We share the concerns of our neighbors about these lights and feel that they are very inappropriate and detrimental in many ways to this neighborhood and the families who live here.

Thank you,

Nina Manzo
Architect AIA

Jay Manzo
Architect AIA

Julia Kwan
2139 40th Avenue
San Francisco, CA 94116-1655
(415) 412-4355

August 25, 2015

Supervisor Katy Tang
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Saint Ignatius High School ("SI") – Permanent Lights on Athletic Field

Dear Supervisor Katy Tang:

As a 23-years homeowner at 2139 - 40th Avenue, I strongly oppose Saint Ignatius' plan to erect permanent lights on their athletic field for purpose of having night games and practices because it would adversely affect the peace, traffic, parking, and lighting in our neighborhood.

After a long day of work, I always looked forward to going home to a quiet and peaceful neighborhood for the last 23 years. All these years, we like to open our vertical blinds and the windows at night to feel the nice breeze in the air as the children do their homework and study in the living room. Our family gathers in the kitchen to eat and relax together in the living room. Unfortunately, during the recent times when SI had their night games, the lights from their athletic field glared through our kitchen and living room windows. It became truly unbearable to stay in these two rooms because the lights shined into our house with such intensity. My family had to evacuate to our bedrooms, but we can still see the intensive glaring lights shining our entire living room from our beds. We ended up having to close our bedroom doors to escape the intensity of the lights. It is unfortunate and unfair that we have to tolerate this during SI's night games.

It is already bad enough that the students take up all the parking spaces on my block during the day time, now we will also be subject to parents/families taking up the parking spaces at night time if night games become a regular occurrence. This means we have to warn our own friends and families not to come visit us during SI night games. As homeowners paying property taxes to the City, why do we have to change our livelihoods to accommodate SI's desire to have night games? Such desire is not

mandatory to their livelihoods, but it would adversely affect many lives in our neighborhood. Our children would have to move into a different part of the house to escape the intensity of the lights and noises (if it's even possible) when they are doing their homework or studying for tests. Will we have to move into our bedrooms to eat dinner as well?

Lastly, the congested traffic during SI games at night had often promoted double-parking in front of the school as well as on Rivera Street (between 38th and 39th Avenue). I often had to go around cars when driving home during night games, not to mention having to be careful with all the jaywalkers who cross in the middle of this street to get to SI's athletic field.

Ms. Tang, please consider the livelihoods of the entire neighborhood and help us save the peace that is so precious to our lives.

Very truly yours,

Julia Kwan

Julia Kwan

Cc: Patrick Ruff, Principal of SI

August 25TH, 2015

I Betty Lew do not want the lights put in the neighborhood
Too much noise, Too bright.
I don't want the enviromental Hazards given with lights and construction.

Betty B Lew
2190-40TH Ave.
San Francisco CA
94116

August 22nd, 2015

2178 40th Ave

San Francisco, CA 94116

To Supervisor Katy Tang and others whom it may concern:

My name is Donald Ruhrmund and I live at 2178 40th Ave. I and my wife, Dr. Kai Ng, have serious concerns about the proposed addition of lights to the St. Ignatius Athletics field at Rivera St. and 39th Ave. We could not attend the community meeting due to Dr. Ng working and I having to care for our young children during the meeting. Our concerns revolve around 1) noise pollution, 2) light pollution, 3) parking and traffic and 4) property values. As the parents of young children, age 2 and 6, whose bedtimes are at 7:30 and 8:30pm respectively, we do not welcome additional noise and light in the neighborhood after 8pm. This would be a significant hardship whenever a night event was held at the athletic fields, especially if they were more than one time per week. Regarding parking and traffic, this creates a situation where we are going to be frequently unable to utilize the street parking near our house when arriving home from work. This is a strictly residential neighborhood, and the influx of traffic cannot be considered an economic gain for the area, only a hardship on local residents. Creating protected parking for residents on the nearby streets during these events could alleviate this problem. However, metered or long term paid parking would not be a welcome solution for our neighborhood. Given the hardships being created for residents in terms of parking, noise and light, I think it is reasonable to assume that properties close to the school would see some decrease in value relative to other values in the neighborhood. I also would raise the point that no one living in the neighborhood gains benefit from the athletic field or lighting as these are private properties which are not available to those of us within the community, the benefit of this project rests solely with the private students of St Ignatius. Please consider these concerns and either block the project or find ways to minimize the hardships on residents impacted by St. Ignatius's proposed plans.

Sincerely,

Donald Ruhrmund

Dr. Kai Ng M.D.

**Response to the subject that St. Ignatius College Preparatory is planning to install permanent lights on their althletic field.**

Ladies and Gentlemen,

We, the undersigned, submit this petition to the St. Ignatius College Preparatory to demonstrate our opposition to consideration of permanent lighting of their athletic Field.

5 years ago, when we planned to move, and might bought a house in San Francisco, we spend a lot of time to think where was a good/perfect place for us. We made a final decision that we bought a house here, out sunset, just because here is very safe, and quiet area with a real nice neighbors, surrounding with public library, playground, and schools. Although we are suffering from the noise, bad traffic and terrible parking, we love to be a residence here.

Now, St. Ignatius College Preparatory is planning to install permanent lights on their athletic field. Permanent lighting on a sports field in such a dense residential area strikes at the distinctive character, and has a deleterious effect on the nature of our community and threaten the very qualities that attract so many to the library and to the west sunset playground. Moreover, the installation of lights will have an immitigable effect on the quality of life for the neighborhood, which already suffers from increased noise, light, and traffic pollution resulting from the use of the athletic Field. Finally, and most important one is the safety. The reckless teenager driver always put our kids into a very dangerous situation. This will be getting worse during the game night.

For these reasons, we, the undersigned, express our opposition to the consideration of permanent lighting and ask the S.I. to end the subject in this regard.

Yulei Shang
Xialian Xu
Liyah Shang
Leon Shang

2123 40th ave

Teo Manzo
3025 Quintara Street
San Francisco, CA 94116
415-661-8583

August 24, 2015

Re: Proposed Lighting at St. Ignatius Fields

To Whom it May Concern:

I am against the lighting plan for the fields because I think it is bad for the environment, the birds, and electricity consumption.

Thank you,

Teo manzo

Teo Manzo
Student
Age 10

To S.I. Hierarchy

I am Vicki Tomola living on 39th Ave at 2135 directly across from the football field and stadium and have been here since it was the sand lot across the street.

I am STRONGLY AGAINST any nighttime/evening games, practices including nighttime lighting and NOISE.

SI school does not have the right to impact the neighboring people's lives in their homes with extremely loud noise, lighting and parking issues past the end of the school day into the evening and night. You are really pushing the point and overstepping your bounds.

This is extremely inconsiderate of the SI school to plan to disrupt and disturb the people living in the homes located near the school, especially those living along 39th Ave and Rivera Street directly across from the field and stadium.

Any attempt on your part to continue these plans indicates how truly disrespectful you are and that you do not care about others. You are only focused on SI, power and greed, not caring about disrupting other people's lives.

(over)

Dear principal:

I am a 88 years old lady. I can hardly sleep at night. The night and the noise make it worse. please stop your night game and let me live a healthy and happy life for the last few years.

Thank you

Cecilia Wong

2101- 39th Ave

# ATTACHMENT 5

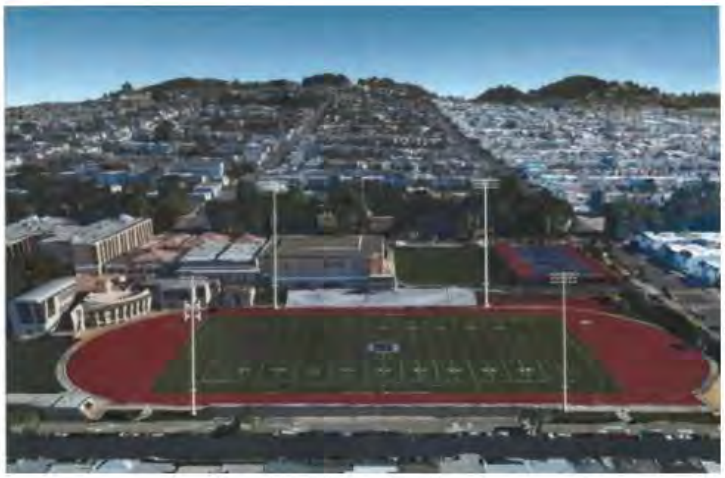
# SINA ONLINE PETITION OPPOSITION COMMENTS
# 2020

ipetitions
YOUR VOICE COUNTS

# NO To Saint Ignatius Permanent Stadium Lights

230 signers. Add your name now!

Deborah Brown 91 Comments



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 200 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

Benja

Jul 24, 2020

No lights

Anonymous

Jul 21, 2020

We live in this neighborhood for the peace and quiet. I'm completely supportive of SI Prep school, but do not support bright stadium lights and noise at night on a regular basis. Please find another venue to host regular sports events in this manner. We need our peace and quiet time. Thank you for your consideration.

Erica Zweig

Jul 21, 2020

There is no community benefit with these lights and huge disturbance to neighbors. SI claims to be "good neighbor" NOT!!

Annie Chow

Jul 18, 2020

SI must provide more onsite parking. No cell tower!

Katherine Cuellar

Jul 16, 2020

No lights! No cell tower!

Maneesh Bhide

Jul 15, 2020

I WANT to support this project, however there are four things SI would have to commit to, in writing, for me to support this project:
1) Light pollution mitigation: SI must use focused, directed lights to minimize light polution as much as possible
2) Trash:SI must articulate and commit to a plan to reduce the amount of trash brought out of SI, and into the surrounding neighborhood.
3) Parking: SI must provide more onsite parking for attendees, to support increased usage at night, when residents are most likely to desire parking as well.
4) neighborhood support: SI must provide some sort of access to the track and tennis courts for neighbors, during non school/event hours (USF does something similar).

Julie and Rob Almeida

Jun 10, 2020

1

We are against the proposed stadium lighting. We currently have a lovely view from our house, and we do not want to look out at a monstrosity of stadium lighting, especially late into the evening.
Home is a place to relax- not be bothered by massive lights shining in your windows when you are trying to sleep, or relax. Not only are they an eyesore, they will increase traffic, noise, pollution to mention a few.
Homeowners don't want to park blocks from their house because there is an additional huge influx of cars coming directly into this neighborhood. There is already an issue with SI related cars parking outside of our homes during the day.
There is an overwheling consensus among people who live here - and that is - we don't want the lights or the 5G.

Jeffrey R Crowley

Jun 10, 2020

1

No to lights on private property.Lights completely ruined South Sunset soccer field.

Adlai Manzo

Jun 09, 2020

1

NO

Jay Manzo

Jun 08, 2020

I strongly oppose this project:
1) Speaking as an architect, this project is completely out of scale with the surounding 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.

1

Kevin Johnson

Jun 08, 2020

I live on 35th Ave and I am in opposition of this project

2

Lindsay Johnson

Jun 08, 2020

I oppose

2

Melinda

Jun 07, 2020

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

2

Michael Bourne

Jun 07, 2020

No lights! No cell tower!

1

Michael Murphy

Jun 07, 2020

This project is of no benefit to the community.

1

Anonymous

Jun 06, 2020

I strongly oppose this.

1

Anonymous

Jun 06, 2020

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 noice, more cars, more violence. Our children are able to walk to the park safely ow and that will be imposible with this project.

1

Alex

Jun 06, 2020

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

1

Robert Lagomarsino

Jun 06, 2020

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.

Jack Allen

Jun 05, 2020

No lights at SI please

Louise Jonas

Jun 05, 2020

I oppose thinking the demands on high school students are high enough already. More light pollution is also undesirable.

Mary Jones

Jun 05, 2020

Too tall!!! Too bright!!!

Anonymous

Jun 05, 2020

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?

Anonymous

Jun 05, 2020

No to lights at SI

Larry Yee

Jun 04, 2020

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.

Lauren Carara

Jun 04, 2020

Not necessary!

Maria Vengerova

Jun 04, 2020

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.

Anonymous

Jun 04, 2020

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?

Ellen Scanlan

Jun 04, 2020

Light pollution is a global problem.

Daniel Dooling

Jun 04, 2020

Pleas listen, consider and join with the people of the neighborhood and do what is right for the residents of this community.

Vicki Tomola

Jun 04, 2020

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.

lei zhu

Jun 04, 2020

NO!

Joy Chan

Jun 04, 2020

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!

Mari Ho

Jun 04, 2020

I am a regular at this spot for the last 12 yrs and deeply concern about theose 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????

Stanley Chan

Jun 04, 2020

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.

Teo Manzo

Jun 04, 2020

I don't want Any Lights and having to deal with night games

Anonymous

Jun 04, 2020

No 5G in this neighborhood please!
Certainly this magnitude of lighting is not necessary!
Please reconsider! THANK YOU@

Anonymous

Jun 04, 2020

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.

Mike Foti

Jun 04, 2020

NO lights please.

Donna Bruno

Jun 04, 2020

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

Roger Wong

Jun 04, 2020

Nightly disruption of the residential neighborhood families and sleeping patterns is not worth playing ball that late.

David Ferguson

Jun 03, 2020

These light will infringe on people's peace and enjoyment.

Jan Rhoades

Jun 03, 2020

No to stadium lights.

Cecily Ina-Lee

Jun 03, 2020

NO STADIUM LIGHTS!!!

Patrick Schlemmer

Jun 03, 2020

I do not want these bright lights in my neighborhood.

Jerry Woo

Jun 03, 2020

No stadium lights in residential area.

Duncan Lee

Jun 03, 2020

At the end of a hard day of work all we want is A little precious time with family in the evening whether it's helping your kids with homework or getting dinner ready!

Isabelle Hurtubise

Jun 03, 2020

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 quailty of life. Please deny the permit or, at a minium, order SI to publish a sufficiently detailed plan so we can ensure mitigation of the detrimental impact on our quiet residential neighborhood.

Natalie Tam

Jun 03, 2020

We should respect the neighbors

John Rueppel

Jun 03, 2020

I support keeping this neighborhood in its current state, without g ant towers blocking everyone's view and drowning out the stars at night.

Anonymous

Jun 03, 2020

No LIghts Please!!! Share....

Adlai Manzo

Jun 03, 2020

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 woulds 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

Steven Struck

Jun 03, 2020

The addition of the stadium lights will be a disruption families along with unwanted noises. This only benefits SI, not families in the community.

Shirley Recipon

Jun 03, 2020

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.

Anonymous

Jun 03, 2020

I strongly oppose the installation of four permanent stadium lights!!

Brian McBride

Jun 03, 2020

The light are much too tall, lights are too bright st night, and cell signals are .uch too I intrusive to the neighborhood. Also, neighbors should be allowed use of the field. Parking on the surrounding streets will be impacted I to evening hours,as well.

No thank you

Meredith Kurpius

Jun 03, 2020

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.

Michele Willson

Jun 03, 2020

The negative impact on our family oriented neighborhood would be too great! NO 5G. No Lights.

Peter A Koch

Jun 03, 2020

Thanks

Kellyx Nelson

Jun 03, 2020

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.

Shirley Yee

Jun 02, 2020

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.

Jim Kurpius

Jun 02, 2020

90ft light towers in the neighborhood, 150+ nights a year, til 10pm? S.I. has no respect for the community.

Lori Ziemba

Jun 02, 2020

NO 5G, NO lights!

Lance Mellon

Jun 02, 2020

This is harmful to the environment. The fields have operated fine without artificial lights for years and can do so going forward without this.

Dolores Joblon

Jun 02, 2020

This will further disrupt a quiet neighborhood and change its character to to an ongoing carnival! Please prevent this from happening!

Gautam Shah

Jun 02, 2020

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.

Nina Manzo

Jun 01, 2020

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

Janny Lee

Jun 01, 2020

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.

Anne Marie Benfatto

May 31, 2020

The obvious lack of regard for the residents of our neighborhood by SI is shameful.

Carole Gilbert

May 31, 2020

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 crouds 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.

Mary Shea

May 30, 2020

SI knew this is a residential neighborhood when they bought the property & built the new school.

Winifred Bamberg

May 30, 2020

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.

Katherine Howard

May 30, 2020

There is already too much night-time lighting in SF. Night-time lighting is damaging to both people and wildlife.

Shirley Xu

May 29, 2020

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!

Garrick Wong

May 29, 2020

They have not and do not have any control over the their students.

Erin Tyson Poh

May 28, 2020

Do not allow this action to be rammed through without community input! Using the SIP to push through an unpopular project is unconscionable.

Jensen Wong

May 28, 2020

NO To Saint Ignatius Permanent Stadium Lights

Allen Malmquist

May 28, 2020

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.

Mafias gruffis

May 28, 2020

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

Ernest Lim and Barbara Lim

May 28, 2020

"WE DO NOT WANT THE PERMANENT STADIUM LIGHTS, PERIOD"!!!

Edmund Lim and Nellie Lew-Lim

May 28, 2020

1

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"!!!

David K Little

May 28, 2020

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.

Timothy Brey

May 28, 2020

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!

Anita Malmquist

May 28, 2020

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.

James Yee

May 28, 2020

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?

Denise Malmquist-Little

May 28, 2020

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.

Matt Ciganek

May 27, 2020

This project is clearly against the wishes of the surrounding neighborhood.

Priscilla Fong

May 27, 2020

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 staduim lights at the school.
-Priscilla Fong

Allison Harrington

May 27, 2020

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.

James R Clark

May 27, 2020

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.

Sign in to comment

SIGNATURES

| | | | | | |
|---|---|---|---|---|---|
| Dan<br>United States | Benja<br>United States | Eugene Llamera<br>United States | Siobhan Mulvey<br>United States | Nicola<br>United States | Erica Zweig<br>United States |
| Laura Peschke-Zingler<br>United States | Ralph Lane<br>United States | Jeffrey Rigo<br>United States | Jade Chan<br>United States | Annie Chow<br>United States | Chandrika Murthy<br>United States |
| Katherine Cuellar<br>United States | Maneesh Bhide<br>United States | Nora McCarthy<br>United States | Amy Wang<br>United States | Alex Bonilla<br>United States | Julie and Rob Almeida<br>United States |
| Jeffrey R Crowley<br>United States | Jennifer Bonilla<br>United States | colleen Wentworth<br>United States | Becky Zhou<br>United States | Anita Lee<br>United States | Vicky lee<br>United States |
| Yolanda Lee<br>United States | Jay Manzo<br>United States | Kevin Johnson<br>United States | Lindsay Johnson<br>United States | Kevin Sun<br>United States | Melinda<br>United States |
| Kelly Le<br>United States | Michael Bourne<br>United States | Crystal Stermer<br>United States | Michael Murphy<br>United States | Sadaf Mir<br>United States | Michelle Tam<br>United States |
| Alex<br>United States | Cynthia Skinner<br>United States | Robert Lagomarsino<br>United States | Michael Ma<br>United States | Jack Allen<br>United States | Louise Jonas<br>United States |
| Mary Jones<br>United States | Gilbert Lam<br>United States | Danielle<br>United States | Bunny Bedell<br>United States | Jonathan Vitug<br>United States | Jodie Young<br>United States | M O'Sullivan<br>United States |
| Larry Yee<br>United States | Lauren Carara<br>United States | Maria Vengerova<br>United States | Vincent T<br>United States | Agnes V<br>United States | Albert Ma<br>United States |
| Dianne Alvarado<br>United States | Ellen Scanlan<br>United States | Millie Fish<br>United States | Daniel Dooling<br>United States | Vicki Tomola<br>United States | Minerva Tico<br>United States |
| Taslim Rashid<br>United States | Mimi Leung<br>United States | Joy Chan<br>United States | Mari Ho<br>United States | Stanley Chan<br>United States | Teo Manzo<br>United States | Jacob Wang<br>United States |
| Mike Foti<br>United States | Donna Bruno<br>United States | Diane<br>United States | Roger Wong<br>United States | Davic Ferguson<br>United States | Katherine Cantwell<br>United States |
| Jonathan Maguire<br>United States | Jan Rhoades<br>United States | Cecily Ina-Lee<br>United States | Karen DeMartin<br>United States | Patrick Schlemmer<br>United States |
| Marykathleen stock<br>United States | Harry<br>United States | Jerry Woo<br>United States | Isabelle Hurtubise<br>United States | Duncan Lee<br>United States | Natalie Tam<br>United States |
| John Rueppel<br>United States | Philip Hung<br>United States | laura treinen<br>United States | Yuriko Kearns<br>United States | Derek Tan<br>United States | Adlai Manzo<br>United States | David Davies<br>United States |
| Joanne Lee<br>United States | Steven Struck<br>United States | Shirley Recipon<br>United States | Virginia Sturken<br>United States | Brian McBride<br>United States | Serena Llamera<br>United States |
| Lisa Struck<br>United States | Michael Yuan<br>United States | Alice Chan<br>United States | Meredith Kurpius<br>United States | Michele Willson<br>United States | Peter A Koch<br>United States |
| Kellyx Nelson<br>United States | Shirley Yee<br>United States | Jim Kurpius<br>United States | Susan rivadeneyra<br>United States | Kelsey Koch<br>United States | Tracy Ashton<br>United States |
| Tina zhu<br>United States | Donald Ciccone<br>United States | Lori Ziemba<br>United States | Lance Mellon<br>United States | Dolores Joblon<br>United States | Sandra Henderson Koch<br>United States |
| David Crosby<br>United States | Gautam Shah<br>United States | Colin Pierce<br>United States | Nichole<br>United States |

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Mafias gruffis
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Linda Delucchi
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James Yee
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Matt Ciganek
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Kera Lagios, LEED AP, Assoc. IALD
2020-09-11

# St. Ignatius Sports Lighting Proposal
# Evaluation of Lighting Impacts

To Whom it May Concern:

My name is Kera Lagios. I am currently the Principal of Atelier Fos, a lighting consultancy and prior to that I was a Principal of Lighting Design at Integral Group in Oakland, CA. I have over 10 years experience designing the lighting for buildings, landscapes and streets, including senior, affordable, and market rate residential projects, transit plazas, airports, schools, universities, and commercial buildings. A large percentage of my work incorporates LEED Platinum and Gold certified and Net Zero projects, and I have practiced in Northern California for 5 years. My education includes a Masters of Architecture from the Harvard University Graduate School of Design. I have won several awards for lighting and daylighting, currently serve as a LEEDUser Expert for the LEED Interior Lighting Credit, and am a LEED Accredited Professional as well as an Associate Member of the International Association of Lighting Designers.

I have conducted an evaluation of the Saint Ignatius Lighting Installation Proposal and provided my analysis in the report below. Please feel free to contact me with any questions. My contact information can be found at the end of the document.

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# 1. Introduction

It is important to understand that amid benefits to the school and its athletes, the proposal by St. Ignatius Preparatory School to install new, permanent lights for their sports field will have significant adverse effects on the residents of the Sunset Neighborhood. Not only is the school proposing a dramatic increase in the quantity of light installed, but they are also proposing a dramatic increase in the hours and days when these lights will be used.

While it is true that LED technology has improved control and efficiency of lighting installations, it is false to say that this installation will have no negative impacts on the neighborhood.

There are significant ways in which the project is overlit and additional steps must be taken by the school to provide alternative options for the installation in order to mitigate the dramatic and negative impact on the nighttime environment for the residents of the Sunset neighborhood.

The following report is my assessment of the lighting aspects of the project based on the materials presented by Musco.

## 1.1 Impacts of Outdoor Lighting

Outdoor lighting provides many benefits to our cities and neighborhoods, but it can also be detrimental. Lighting enables an extension of the use of outdoor spaces beyond daylight hours, helps promote the feeling of safety and security, is used for signage and wayfinding, and can provide beautiful accents for buildings and landscaping.

Unfortunately, outdoor lighting also has drawbacks. These include l**ight pollution, light trespass, glare, excess energy use, degradation of aesthetics, and it may harm human, animal and plant health**. Because of this, it is important to weigh the benefits and costs whenever planning new lighting installations. In addition to considering those who will benefit from the lighting, it is essential to consider the people and environments beyond the property line, to evaluate the impacts, and work together to investigate alternatives that may limit the negative impacts.

### Why is darkness important?

Despite the advancements in LED technology, our nights are getting brighter, and in fact, it may be the energy efficiency and cost effectiveness of LEDs that are causing more outdoor lighting to be installed.[1] According to the Illuminating Engineering Society (IES), “The duration of lighting has increased; in some areas there is never any real darkness, which might have a profound impact on natural cycles.”[2]

---

[1] Kyba, Christopher, C.M. “Artificially lit surface of Earth at night increasing in radiance and extent.” Science Advances 22 Nov 2017: Vol. 3, no. 11, e1701528.
[2] IES RP-33-14, *Lighting for Exterior Environments*, 2014, p. 1.

Fundamentally, darkness is important because human beings, animals and plants have **evolved biologically to take cues from the daily cycles of light and dark**, and our ability to see evolved over millions of years of relative nighttime darkness[3]

Brighter nighttime environments are a shift from that evolutionary condition, and pose potential problems to our environment and potentially our health. Just as we are concerned about the effects of polluted air and water on our environment and ourselves, the concerns about excessive light at night must be taken seriously.

### 1.1.1 Light and health

Development in research on the effects of light on human health have increased dramatically over the past few decades and have accelerated quickly in the most recent few years. We now know that **our eyes have two functions: to help us see and to regulate our circadian system**. In turn our circadian system functions like a clock.

#### *Vision versus the circadian system*

The circadian system differs from the visual system. While the visual ("photopic") system which functions during daylight, is most sensitive to green light. The melanopic" system which governs circadian response, is **more sensitive to light in the blue part (480nm) of the visual spectrum** (Table 1 and Figure 1).

**Table 1. Comparison of visual system and circadian system**

| | Visual system | Circadian System |
|---|---|---|
| **Visual response** | photopic or scotopic | melanopic |
| **Peak sensitivity** | ~555nm (green) or ~505nm (blue-green) | ~480nm (blue) |
| **Cells in eye** | rods and cones | ganglion cells |

#### *Circadian regulation*

The circadian clock does not regulate itself. It must be reset on a daily basis, and the resetting is done by the natural 24-hour light-dark cycle. Blue-enriched light is one of the factors that suppresses melatonin and cues the reset of the circadian clock each morning. Not enough in the morning may make us drowsy, and too much after dark may keep us awake.

Although much of the attention given to light and health focuses on blue-enriched lighting, it is important to note that the circadian response to light is governed by several factors, of which

[3] IES TM-18-18, *Light and Human Health*, 2018, p. 9.

***spectrum*** is one. In fact, "Multiple optical radiation characteristics (**quantity, spectrum, timing, duration, pattern and prior optical radiation exposure**) all affect the magnitude of the phase-resetting response."[4]

### *What does the circadian clock do?*

The regulation of the circadian clock has been tied to a number of neurobehavioral responses and linked to clocks in the liver and the lungs. Processes include regulation of metabolism, wound healing, mood, reproductive processes and more. According to the IES:

"In mammals, a wide variety of physiological and behavioral events exhibit circadian rhythmicity, ranging from the obvious sleep-wake cycle, to more covert changes in hormone levels, core body temperature, blood pressure and gene expression."[5]

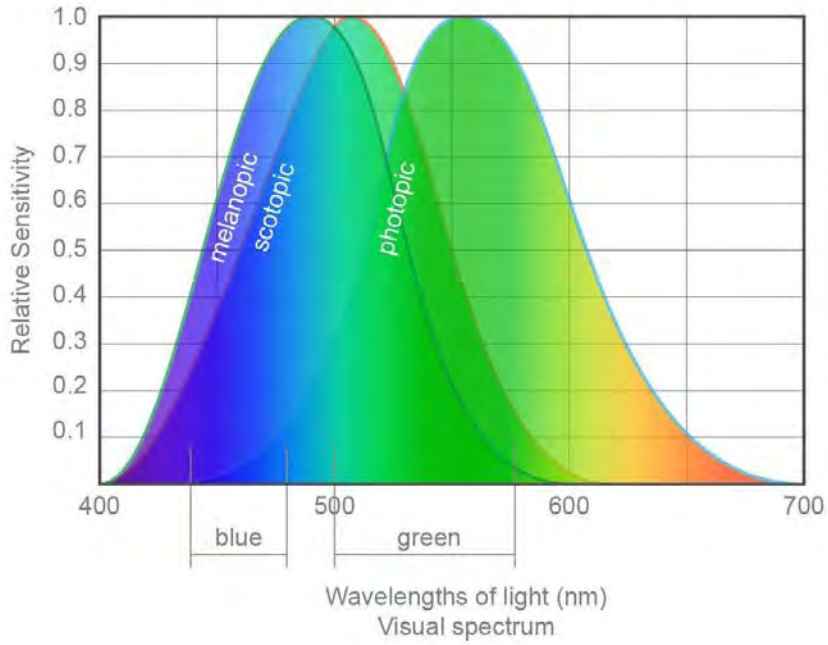
In general, light and darkness are important to our health for the following reasons:

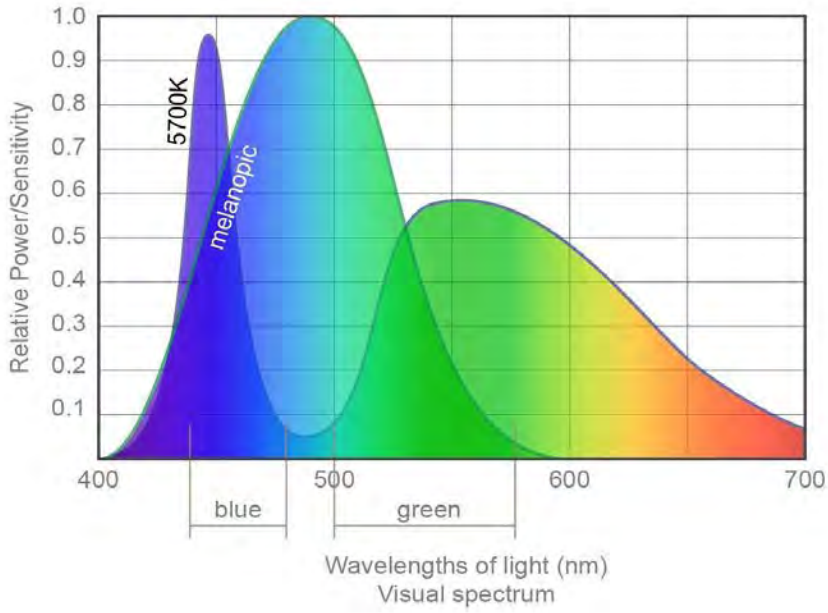
- General exposure to nuisance overlighting and glare can result in discomfort and disrupt sleep, both which affects health and wellbeing in their own right.
- Blue-light at night is particularly problematic because the circadian system is most sensitive to light in the "blue" range of the visible spectrum. "Cooler" color temperatures, such as the 5700K LEDs used in the SI project, are more likely to trigger a circadian response. (See Section 1.2 for discussion of color temperatures).
- Currently there are no defined thresholds for exposure to light at night in terms of the effects on the circadian system, and the IES's position is that normal exposure to light at night is not life-threatening.[6] Although we still don't know the exact thresholds at which the circadian cycle can be disrupted by light at night, there is evidence that even low levels might be capable of triggering a response.[7]

---

[4] "Multiple optical radiation characteristics (quantity, spectrum, timing, duration, pattern and prior optical radiation exposure) all affect the magnitude of the phase-resetting response.", IES TM-18-18, p. 10.
[5] IES TM-18-18, p.11.
[6] IES RP-33-14, p.4
[7] IES TM-18-18, p. 14-15.

**Figure 1. Peak sensitivity to different wavelengths of light**




*Top: Graph showing the visual (photopic (day)and scotopic (night)) and circadian (melanopic) peak sensitivity curves overlaid with the colors of the visual spectrum (nm). The circadian system is most sensitive around 480nm (blue light), whereas the visual (photopic) system is most sensitive around 555nm (green light).*

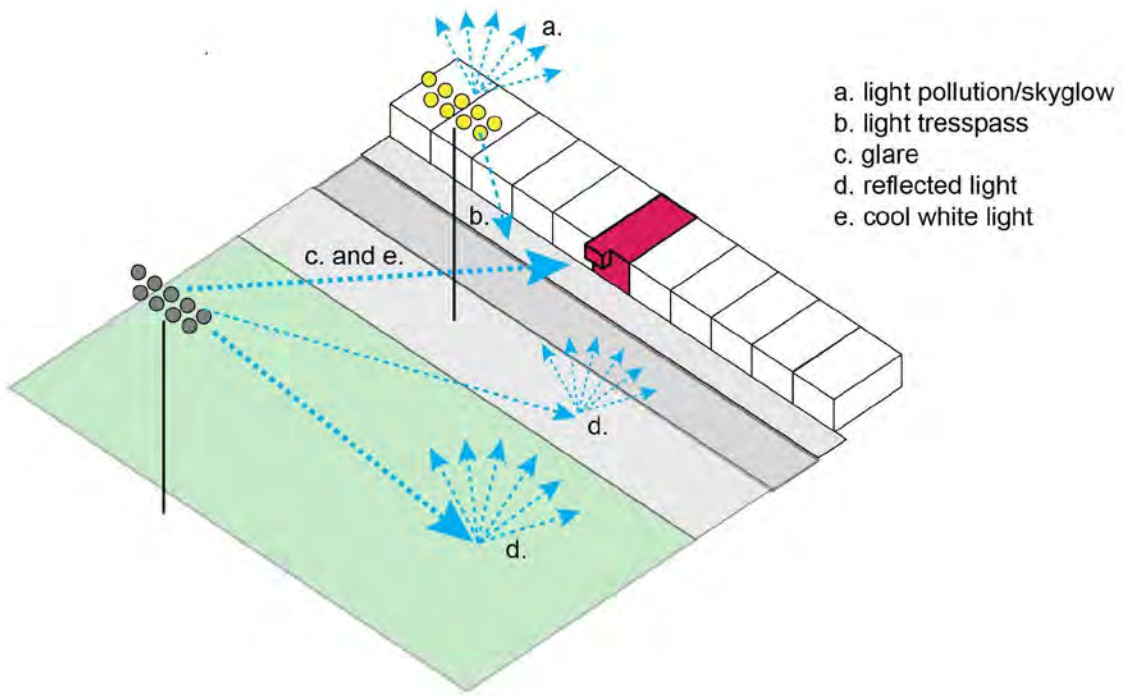
*Bottom: The melanopic response corresponds closely with the blue-enriched light present in 5700K light sources, meaning that cooler color temperatures are more likely to trigger the melanopic response.*

*Diagrams by author, based on: https://www.ies.org/fires/simplifying-melanopsin-metrology/*

### 1.1.2 Other impacts of outdoor lighting

There are three aspects of outdoor lighting that are most often used to evaluate the impacts of an installation on the nearby environment: light pollution, light trespass and glare.

**Figure 2. Outdoor lighting aspects of importance**




***Light pollution*** is defined by the IES as, "**the combination of all the adverse or obtrusive effects of electric light that produces sky glow**."[8]

Light pollution is caused by light that shines upward to the night sky, and is exacerbated as that light reflects off of particles in the air. While light pollution typically is measured as uplight from a luminaire, light from downward pointed luminaires that reflects off of buildings and roads also contributes to sky glow.

Light pollution is important because it:

- is not local. For even small cities, it can be viewed from miles away.
- reduces the darkness of our nighttime environments (see below for more discussion) which carries with it environmental and aesthetic degradation
- obscures the view of the stars and the Milky Way
- negatively impacts reproduction, feeding and habitation of plants and animals

[8] IES RP-33-14, p. 21.

*Measurement*:

Typically ,light pollution is measured according to how much light from a luminaire or project is emitted upwards, or above horizontal.

***Light trespass***, **"relates to light that is obtrusive off-site."**[9] This metric evaluates light that falls outside the project boundary or property line.

Light trespass is important because:

- It is typically an eyesore and a nuisance for neighbors
- It is "wasted light" and energy inefficient

*Measurement*:

Typically light trespass is measured as the amount of light falling on a plane that extends vertically from the property line upwards.

**Figure 3. Light Trespass**

These two photos were taken at the same facility, on opposite sides of the access road. (Left) Pointed toward the athletic field. (Right) Pointed toward the neighborhood.

*Image Source: IDA-Criteria for Community-Friendly Outdoor Sports Lighting v1.0, November 28, 2018*

**Glare** is, "the sensation produced by luminance within the visual field that is sufficiently greater than the luminance to which the eye is adapted causing annoyance, discomfort or the loss of visual performance and visibility."[10] The IES breaks glare down into two significant categories: **disability glare** and **discomfort glare**.

[9] IES RP-33-14, p. 22.
[10] IES RP-33-14, p.53

Glare is problematic because:

- Glare from bright sources can make objects in the foreground harder to see
- Glare is a particular problem for seniors. According to the IES, "the loss of lenticular transparency scatters light and reduces the apparent contrast between objects," and, "is known as disability glare."[11]
- Obtrusive lighting can be an eye-sore. "Non shielded outdoor lighting can be observed at great distances; nighttime visual clutter can be aesthetically disruptive".[12]

*Measurement:*

Glare is one of the most complicated metrics and is currently evaluated in many different ways. In general, the various equations that define glare, all incorporate four factors: **luminance of glare source, size of glare source, scene luminance and position** (see Equation 1.0 below). Various standards use varying methods for characterizing glare. (For more discussion on glare, see Section 2.3).

**Equation 1.0. Glare calculation**

Luminance of Glare Source

Size of Glare Source

$$Glare = \sum_{i=1}^{n} \frac{L_{si}^{\exp} \omega_{si}}{L_b^{\exp} P_i^{\exp}}$$

Scene Luminance

Position Index

*Source: Jakubiec, Alstan and Christoph Reinhart, "The Use of Glare Metrics in the Design of Daylit Spaces: Recommendations for Practice", 9th International Radiance Workshop; September 20-21, 2010.*

### *Energy use and Aesthetics*

Energy use and aesthetics are both side-effects of outdoor lighting. These factors do not have their own associated metrics.

[11] IES RP-28-07 *Lighting and the visual environment for senior living*, 2007, p.1

[12] IES RP-33-14, p.1

## 1.2 How is outdoor lighting governed?

Outdoor lighting in the United States, generally, does not have any hard and fast requirements for design. Municipalities can elect to adopt certain standards or implement their own, but more often, outdoor lighting is based on its context and some degree of interpretation.

### 1.2.1 Guiding standards

There are several organizations that publish lighting standards that can be used to design and evaluate lighting. The major entities are the Illuminating Engineering Society (IES) and the International Commission on Illumination (CIE). Both publish recommendations, often on the same topics, however, it should be noted that the IES, sometimes referred to the IESNA (Illuminating Engineering Society of North America) predominates in the United States. The standards, technical manuals and recommended practices produced by the IES and CIE are developed by committees consisting of experts in the field. They provide guidance for target light levels and limits for metrics like light trespass. Exceeding these limits will result in over-lighting, energy misuse, unwanted light, potentially significant adverse aesthetic impacts and a substantial percentage of affected persons finding the visibility unacceptable.

In addition, other organizations like LEED and the IDA (International Dark-Sky Association) have published information which sets targets for certain aspects of outdoor lighting. Of these, the relevant publications are:

- IES RP-33-14 Lighting for Exterior Environments, 2014
- CIE 150 2017 Guide on the limitation of the effects of obtrusive light from outdoor lighting installations, Second Edition, 2017
- LEED v4.1 Light Pollution Reduction Credit
- IDA Criteria for Community-Friendly Outdoor Sports Lighting v1.0, November 28, 2018
- Joint IDA-IES Model Lighting Ordinance, 2011
- California Energy Commission TITLE 24, PART 6, AND ASSOCIATED ADMINISTRATIVE REGULATIONS IN PART 1, Section 130.2 Outdoor Lighting Controls and Equipment
- California Green Buildings Standards Code, Title 24, Part 11 5.106.8

In addition, there are two additional relevant references:

- IES RP-6-1 Sports Lighting, 2015
- IES TM 18-18 Light and Human Health, 2018

## 1.3 How is lighting measured?

While we are all familiar with lighting in many ways, many of us are not familiar with the technical ways in which lighting is characterized, particularly outdoors.

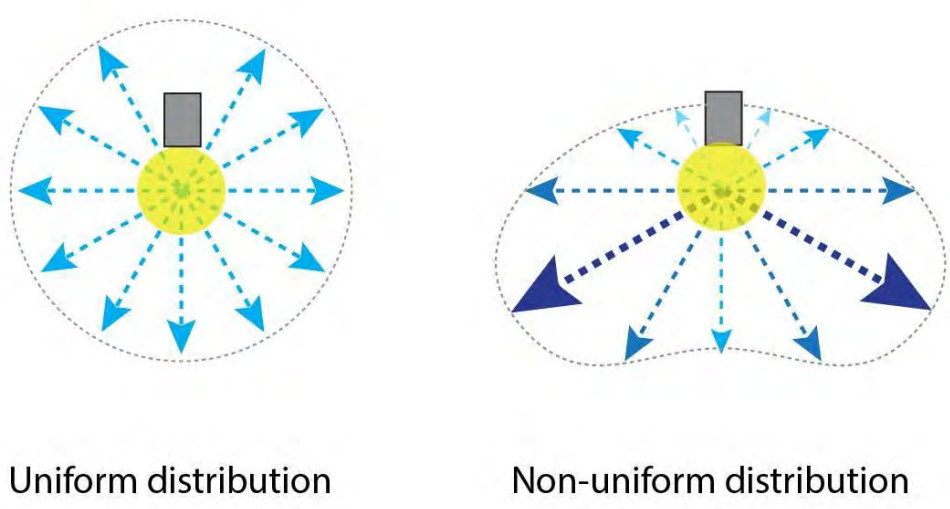
### Lighting Zones and the MLO

Because outdoor areas range from nature reserves to places like Times Square, it is first important to characterize the zone in which a project is located. The IES and the IDA developed the "Model Lighting Ordinance" which classifies outdoor nighttime environments into lighting zones 0-4, with LZ0 being a location in which describes the darkest environments (nature preserve), and LZ4 beings the most intensive use of lighting (e.g. Times Square) (see Appendix 1). Once a zone is established for a project, recommendations for appropriate light levels follow from there. Note: the CIE uses a similar, but slightly different classification system, and California's Title 24 previously used a system with 4 zones, however it has now accepted the MLO classification system.

### Candelas (cd)

Candelas are defined as "the SI unit of luminous intensity. One candela is the luminous intensity [emitted by a light source (e.g. fixture, bulb, lamp)], in a given direction."[13] If the light distribution is uniform, the same candela distribution will be emitted in all directions. If the light distribution is non-uniform, the candelas in each direction will vary. See Figure 4 below for illustration.

**Figure 4. Light Distribution**




[13] Oxford Languages Search for: definition of "candela", "Google English Dictionary", 2020 Oxford University Press.

*Illustration of candelas for uniform and non-uniform distribution light sources*

**Illuminance (footcandles(fc) or lux(lx))**

Illuminance is the quantity of light falling on a surface. Illuminance varies with angle and distance of the receiving surface. In Figure 5 below, the light source is uniform and emits the same candelas in each direction, however, the illuminance will vary (a v. b) depending on where the light is measured.

**Figure 5. Illuminance**

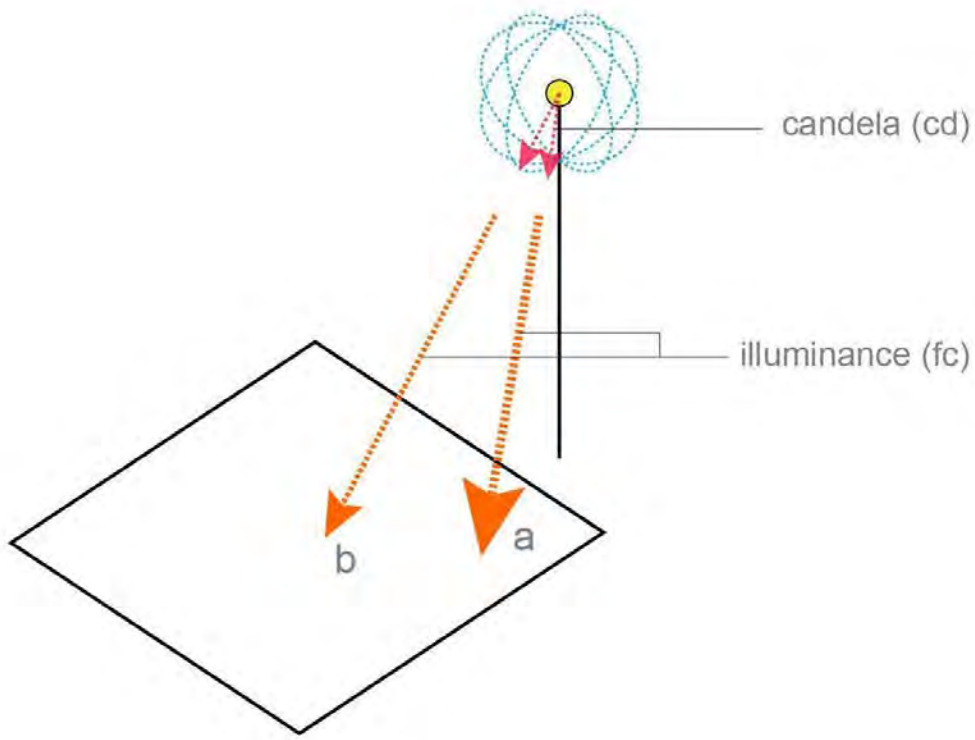



*Illustration showing that even while candles are constant, illuminance can change with distance or angle. Illustration by author.*

### Luminance (cd/m$^2$)

Luminance can be referred to as brightness of a surface (rather than candelas which are sometimes used to qualify glare). Brightness changes with the color (reflectance) of the surface being lit. in Figure 6 below, **the illuminance (b) is the same** for both the white and gray surfaces, but the **luminance (d) is lower for the gray surface than for the white surface (c).**

**Figure 6. Luminance**

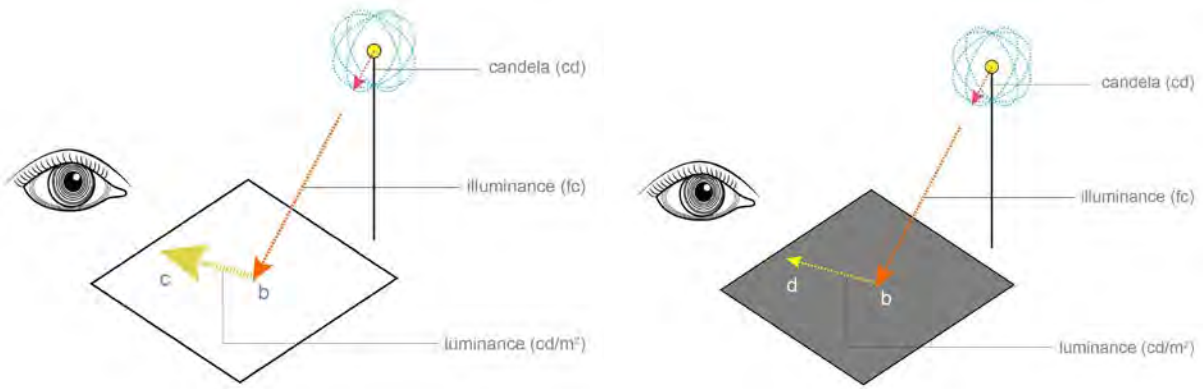



*Illustration showing that luminance of two surfaces will change with color, while illuminance remains constant.*
*Illustration by author.*

### Spectrum, Color Temperature, CCT

While we tend to think of most light as “white”, in reality, light sources can vary in what is called “spectrum” or the color of the light. There is a relationship between ***spectrum and color temperature*** (Figure 7).

Light that appears “cool” tends to have more relative power in the blue part of the visible spectrum. Conversely, light that appears “warm” tends to have more relative power in the yellow and red part of the visible spectrum. LEDs tend to be more blue because their technology makes the bluer range more energy efficient.

Unfortunately, blue light is more triggering for the circadian system, and blue light tends to appear brighter than warmer light of equivalent power (Figure 8).

**Figure 7. Color Temperature Scale**

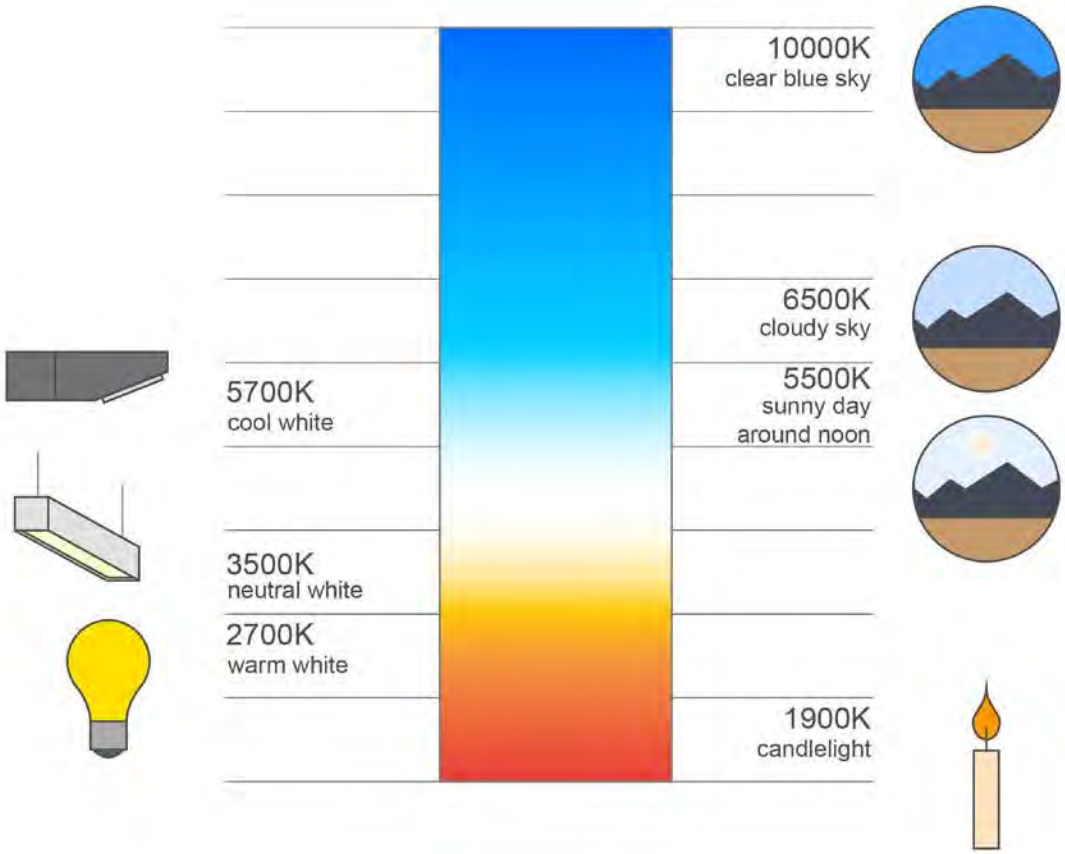
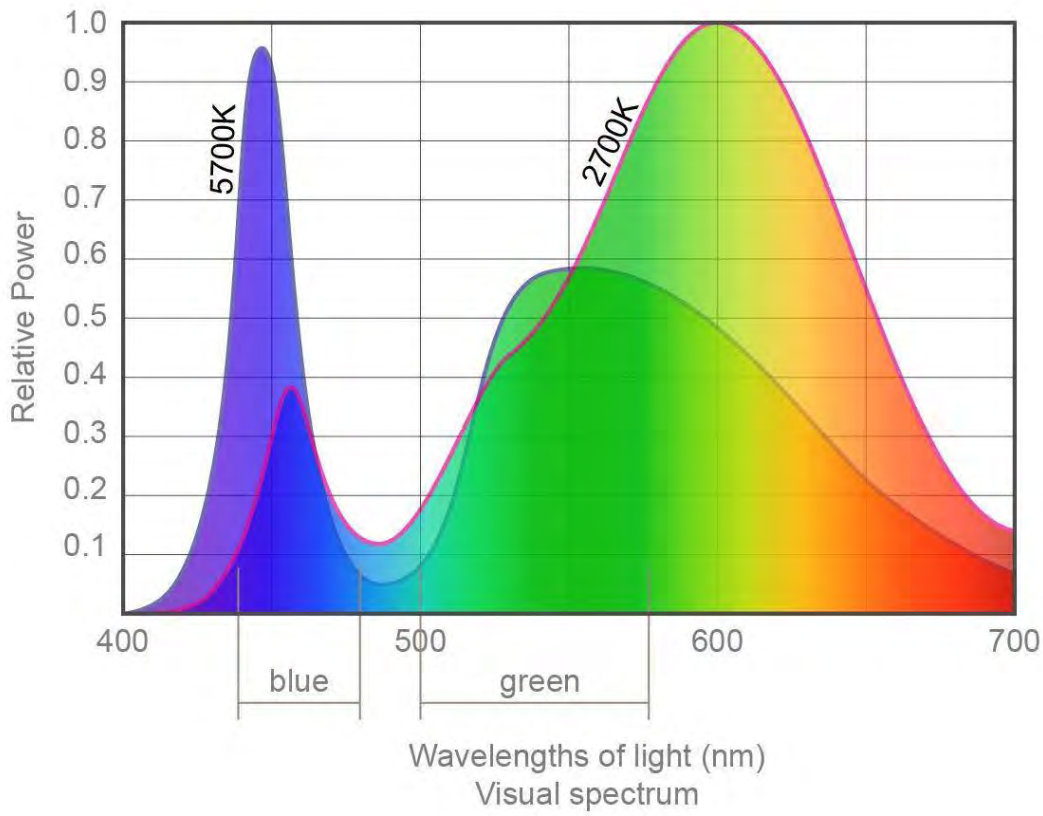



*Illustration of color temperatures.*
*Illustration by author, based on values from https://www.schorsch.com/en/kbase/glossary/cct.html*

**Figure 8. Visual Spectrum**




*Notice that the peak of the 5700K source is close to the peak sensitivity of the circadian system shown in Figure 1 in section 1.1.1*

*Diagram based on: https://www.allthingslighting.org/index.php/2019/02/15/filtered-leds-and-light-pollution/*

### Angle of measurement

When reviewing lighting calculations, it is important to note that sometimes calculations are measured "horizontally" and sometimes "vertically". This is mostly true when talking about illuminance.

> **Horizontal measurement:** This refers to measuring light on a plane parallel to the ground, such as a sidewalk surface, or a tabletop.
>
> **Vertical measurement:** This refers to measuring light on a plane perpendicular to the ground, such as a wall.

### Light is additive

If current light levels on your property are 0.2fc and 0.4fc of additional light are added by a new installation, the new light levels will be 0.6fc, and the light levels will be tripled.

### Photometrics

"Photometrics" is a term often used interchangeably to describe two separate things.

- **photometric calculations** are the final "plots" of calculation grids over a project area that show calculations of illuminance, luminance or other metrics.
- **photometric files (a.k.a. "ies files")** are small computer files made for individual luminaires that contain information on the distribution and power of the light emitted in all directions from a source. These files are used in computer models to produce the photometric calculations.

### Other factors affecting vision

Several things affect our ability to see. The first is that we need much less light to see in darkness than we do during the day. This is due to how our eyes adjust to lower levels of light, versus higher levels. The classic example of this is when entering or leaving a movie theater, our eyes need to adjust for a short time in order to adapt to either a much lower or much higher level of light. In general, it is inappropriate to light nighttime environments to the same levels we light daytime environments.

**Table 2. Typical light levels**

| Typical light levels | |
|---|---|
| Moonlight | 0.01fc |
| Typical office lighting | 30fc |
| Daylight (no sun) | 2,000-12,000 fc |

A second important factor in how we see is age. In general, as we age, we need more light to see, but contrast becomes more significant. Disability glare worsened by very bright sources and reflected light can be of particular issue for older individuals in nighttime environments.

# 2. Evaluation of Proposed Design

This section reviews the proposed design as presented by Musco in the following documents:

- 2020 Musco Photometrics, St Ignatius Prep School FB/SO
- 2020 Musco photo renditions nighttime SI HS VIEWS_01.07.2020.pdf
- Musco light drawings 7-13-20.pdf
- ! candelas Evolution of Light Control-Musco - Saint Ignatius Light Poles.pdf

## 2.1 Project Lighting Zone

The project lighting zone is LZ2. This is defined in the Model Lighting Ordinance and referenced in IES RP 33-14 *Lighting for Exterior Environments* as, "areas with moderate ambient lighting levels," and which typically include, "multifamily residential uses, institutional residential uses, schools, churches, hospitals, hotels/motels, commercial and/or business areas with evening activities embedded in predominantly residential areas, neighborhood serving recreational and playing fields and/or mixed use development with a predominance of residential uses,"[14] (see Appendix 1). This designation is the basis for the light level targets and limits cited below, unless otherwise noted.

The IES is the predominant lighting standards organization in the United States.

## 2.2 Light trespass in proposed design

Table 5 of the IES RP-33-14 *Lighting for Exterior Environments* lists "Maximum Vertical Illuminance at any point in the vertical plane of the property line," (see Appendix 2). The values are organized according to Lighting Zone. On page 15 of Musco's Photometrics ("2020 Musco Photometrics, St Ignatius Prep School FB/SO"), the vertical light levels (measured at 3'-0" above grade), have a maximum of 6.93fc. This is over 20 times what is allowed by the IES.

**Table 3. Maximum vertical illuminance - IES standard versus Musco**

| | IES (LZ2) | Musco Photometrics, p. 15 |
|---|---|---|
| Maximum Vertical Illuminance at any point in the vertical plane of the property line | 0.3fc | 6.93fc |

Another guideline that can be referenced is LEED (Leadership in Energy and Environmental Design). LEED v4.1's Sustainable Sites, Light Pollution Reduction credit sets a more aggressive maximum illuminance value (see Appendix 3), but instead of measuring the light on a vertical plane (up to 33'-0" high) at the property line, they allow a property adjacent to a street

[14] MLO Task Force, *Joint IDA-IES Model Lighting Ordinance*, 2011, p. 7, and IES RP-33-14, *Lighting for Exterior Environments*, 2014, p. 24-25.

(such as St. Ignatius), to use the street centerline as the location of the vertical plane upon which measurements are taken.[15]

**Table 4. Maximum vertical illuminance – LEED standard versus Musco**

| | LEED (LZ2) | Musco Photometrics, p. 6 |
|---|---|---|
| Maximum Vertical Illuminance at property line or street centerline | 0.1fc | 2.6 fc |

The project's photometrics show as much as 2.6fc at 0'-0" off the ground, 26 times the limit for LZ2. Clearly, even if LEED is not being pursued, this is an excessive amount of light spilling off of the property and is unnecessarily disruptive to the neighbors and their property.

## 2.3 Glare in proposed design

Glare is one of the major issues with lighting installations, especially ones like sports lighting where the lights are powerful and prominent. Glare is one of the major complaints that people have about lighting installations.

Musco has presented glare from the design based on maximum candela values, however Musco does not cite a source for the scale they use for their Glare Impact Study. That said, even by their own scale, the project produces a glary environment.

Musco's scale:

- High glare: 150,000cd or more
- Significant glare: 25,000-75,000cd
- Minimal to no glare: 500cd or less

Musco has provided no classification for 500-25,000cd.

According to Musco's calculations, the residences across from the school fall into the "yellow" band which encompasses 1,000-5,000cd which is above their own cut-off for "minimal to no glare", and part of which falls into the non-existing category from 500-25,000cd. Clearly the glare at the properties from the installation is non-negligible.

The IES does not use candelas as a way to evaluate glare, and so, to compare Musco's calculations against a published standard, the CIE 150 2017 Guide on the limitation of the effects of obtrusive light from outdoor lighting installations, Second Edition, can be used (Figure 9).

[15] USGBC, "Light Pollution Reduction - Language," LEED BD+C: New Construction v4.1 - LEED v4.1

**Figure 9. Glare angles**

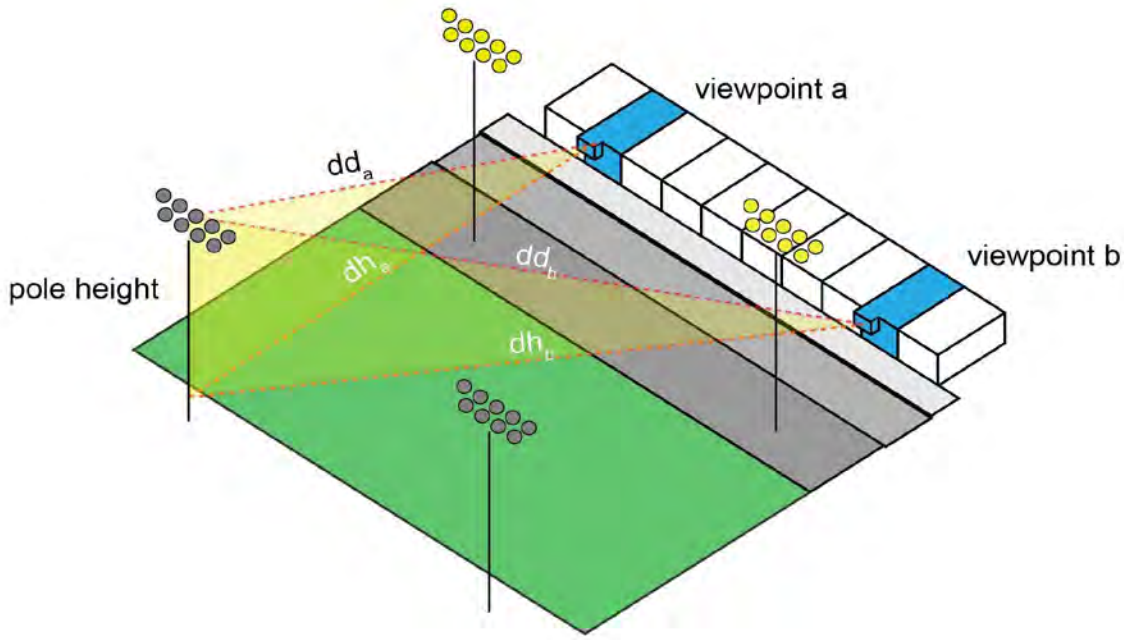



*Illustration of CIE 150: 2017, Table 3. Note: not to scale.*
*Illustration by author.*

In CIE 150: 2017, Table 3, "Maximum values for luminous intensity of luminaires in designated directions," (see Appendix 4) allows users to determine the maximum values for the luminous intensity (cd) of luminaires in designated directions where views of bright surfaces of luminaires are likely to be "troublesome for residents". This metric takes into account the luminance of the scene (via the lighting zone), the luminance of the source itself (cd), the size of the source ($A_p$) and the position (d, distance from the observer).

To calculate what the limit on glare is for the houses along 39th Avenue across from the project, we need to determine their distances from the light sources, the area of the luminous part of the light source itself, and then use the table to calculate the maximum candelas.

For this calculation, we can select (2) representative view points, a and b (see Figure 9 above). If the viewpoints from the second story windows are roughly 12'-0" above the ground, the vertical distance becomes: 90ft-12ft =78ft.

We can assume the size of the Musco lights is 0.03 to 0.13 $m^2$, and the lighting zone is E3 (E2 is shown for comparison), the glare (cd) limit of the luminaire can be calculated as:

Zone E2: Max candela allowed = 5 x distance from light source to the observer (m)
Zone E3: Max candela allowed = 7.5 x distance from light source to the observer (m)

**Table 5. CIE Glare standards versus Musco**

| | Horizontal distance (dh) | Diagonal distance (dd) | CIE Glare limit Zone E2 | CIE Glare limit Zone E3 | Musco's Glare Impact Report |
|---|---|---|---|---|---|
| **Viewpoint a** | 128m | 131m | 655cd | 830cd | 1,000-5,000cd |
| **Viewpoint b** | 164m | 166m | 982.5cd | 1245cd | 1,000-5,000cd |

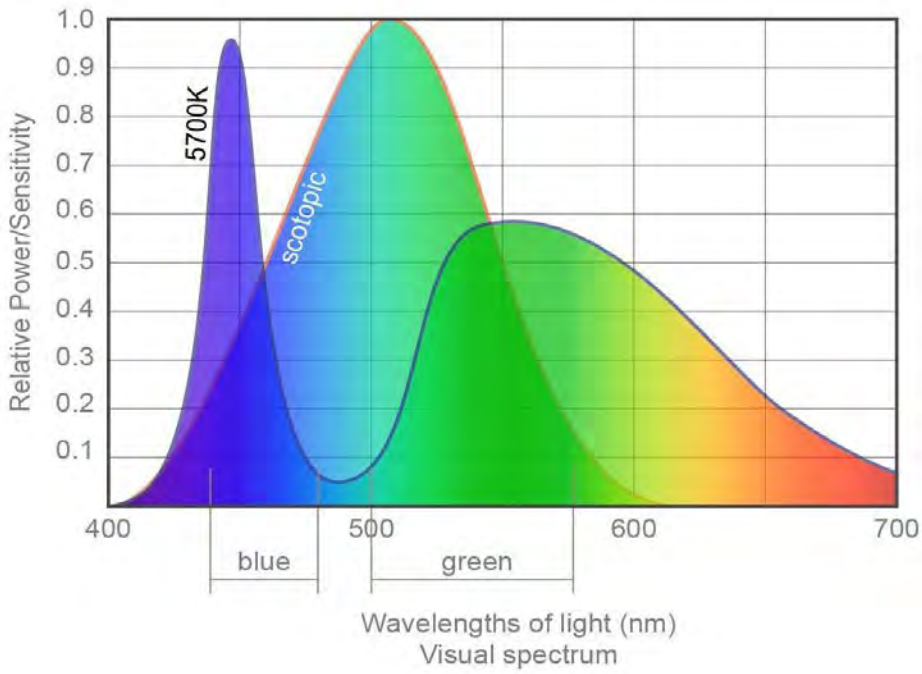
Referring again to Musco's Glare Impact Study, it shows the houses across 39th Avenue from the school as largely falling into the 1,000cd - 5,000cd range, which is much higher than either the E2 or E3 limits.

**Other factors regarding glare**

Glare is also a factor of the spectrum of the light source. "Discomfort glare, the irritation from bright lights in the field of view, tends to be increased with sources richer in short wavelengths (blue light)."[16] This effect is worsened for seniors and those above age 65.[17]

[16] IES RP-33-14, p. 5
[17] "Light and Vision", IES Ready Reference App, Illuminating Engineering Society, 2020.

**Figure 10. Visual Spectrum** (copy of Figure 8)




*Just as the 5700K color temperature is closer to the melanopic response curve, it is also close to the "scotopic" response curve, which governs vision at low light levels (nighttime).*
*Illustration by author based on: "Light and Vision", IES Ready Reference App, Illuminating Engineering Society, 2020 and https://www.allthingslighting.org/index.php/2019/02/15/filtered-leds-and-light-pollution/*

**Other glare metrics**

It should also be noted that there are other methods of evaluating glare that could be used to provide a more thorough and complete picture of the project's potential for glare.

## *Backlight-Uplight-Glare (BUG) Rating Method*

The BUG rating method (Figure 11) is used by California's Title 24 & Calgreen, LEED and the MLO (all use the limits set forth by the MLO). This method uses the photometric files of each light source (aka .ies files) and evaluates the quantity of light (in total number of lumens) being emitted from a source in various directions. For the Backlight and Glare portions of the metric, the rating takes into account the height of the fixture and the distance to the property line.

Musco has not provided the .ies files for their fixtures, so it is not possible to independently evaluate the design based on BUG ratings. However, from the perspective of glare, given the wattage of the luminaires, their heights and the distances from the property line, it is unlikely that the design would comply with the limits set forth in the IES.

**Figure 11. BUG ratings**

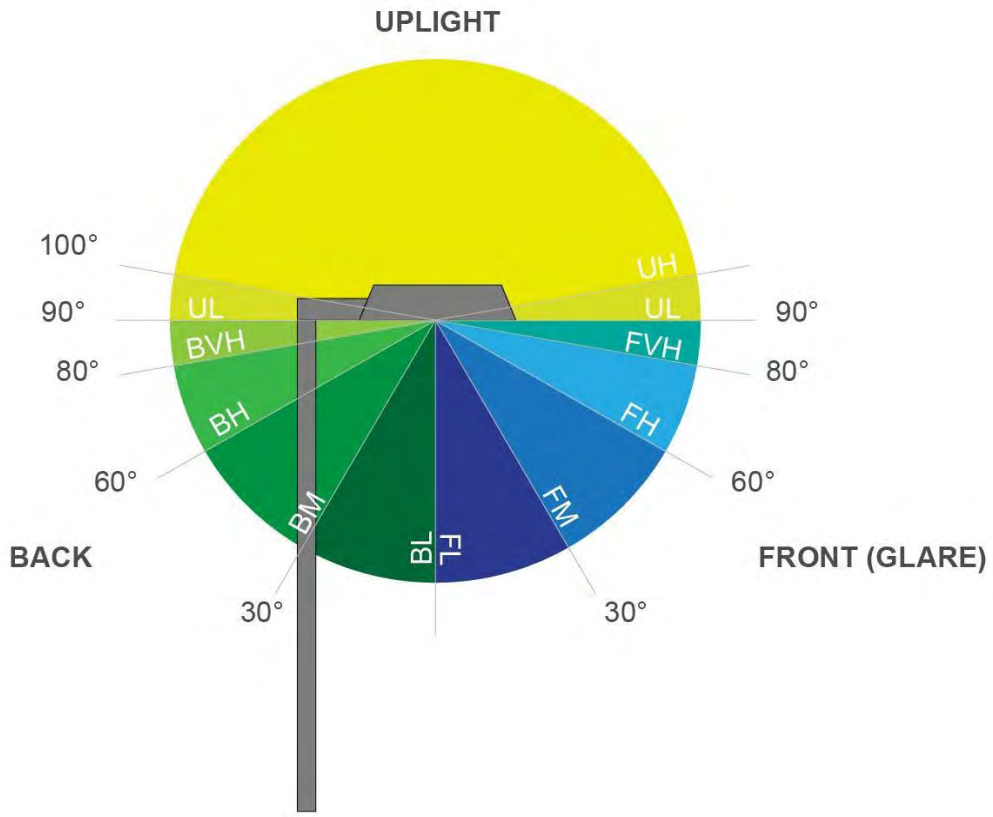



*Illustration of BUG rating*
*Illustration by author.*

### *Calculated glare metrics*

Glare is a complex phenomenon and maximum candelas may not entirely encompass. Current technology and software, including the use of HDR images (computer generated or photographed) can be used to conduct view-based analysis to determine the potential for glare more accurately. Programs such as Evalglare (via Radiance) can be used to calculate various metrics including: CGI (CIE Glare Index), VCP (Visual Comfort Probability), and UGR (Unified Glare Rating, a simplification of CGI).[18]

This is not cost prohibitive, and should be considered for a more complete evaluation of the potential for glare in the project, as well as a possible tool for making improvements to the design.

[18] Note, the metrics cited are specifically applicable to "artificial light sources". Jakubiec, Alstan and Christoph Reinhart ""The Use of Glare Metrics in the Design of Daylit Spaces: Recommendations for Practice," 9th International Radiance Workshop; September 20-21, 2010.

**Why does this matter?**

Glare can make it hard to see while outdoors, and hard to sleep indoors if a strong light is shining into a bedroom window. It is also unsightly and contributes to overall light pollution.

## 2.4 General Light Levels at adjacent properties

It should not go without notice that the current environment in the Sunset Neighborhood, adjacent to St. Ignatius, is a relatively low-light environment. There are some street lights, but the low-density housing and open space and nearby ocean leave the neighborhood in relative darkness, not unlike many other neighborhoods in San Francisco.

While light trespass limits help to understand how much light is spilling from the project onto adjacent property, it does not tell the whole story. The IES provides guidelines for what light levels should be targeted so that the majority of users feel the lighting is visually acceptable.

Because it is not necessary to light all parts of a property, the IES only provides recommendations for certain areas, for example pathways. This is important because it is both atypical and not desirable to light all areas around a house (for instance, the front lawn). The IES provides this in RP-33-14, Table 2b: Illumination Values under the designation “Paths to curb,” (see Appendix 5).

**Table 6. IES acceptable light levels versus Musco**

| Paths to curb-low activity (i.e. sidewalks from front door to street) | IES | Musco Photometrics, pp. 11, 12 |
|---|---|---|
| Horizontal | 0.1fc avg | 0.33fc |
| Vertical | 0.1fc avg | 0.42fc |

Musco is showing light levels 3-4 times what is recommended in an LZ2 residential environment.

**Why does this matter?**

As with the light trespass values, the Musco photometrics show that the installation will significantly impact the light levels for residents, especially those directly across the street from the school. This installation is dramatically changing the character of the neighborhood, particularly for those properties directly across the street. What was once a generally low-light neighborhood is being transformed into a much higher-light-level environment.

## 2.5 Sports field light levels

The Musco field is currently overlit for the class of play. St. Ignatius has stated an anticipated 800-1,500 spectators for football games. According to IES RP-6-15, high school competition play with facilities up to 2000 spectators falls into Class III play. The IES sets a light level of 30fc average for Class III football and soccer (see Appendix 6). Musco's photometrics show an average of more than 50fc on the field.

The IES RP-6-15 *Sports and Recreational Area Lighting* sets illumination targets for play based on **skill level** and **number of spectators**. This is because, "illuminance is determined by the lighting required for the spectators seated farthest from the playing area. This condition may require several times the illuminance level found to be sufficient to the sport."[19]

According to the IES RP-6-15, Table 2: Class of Play (see Appendix 6):

Class III: High school, facilities with spectator capacity under 2,000

Class IV: High school, facilities with limited or no provision for spectators

In addition, during the other vast majority of times when the field will be used for practice with few or no spectators, light levels should be even lower, at Class IV play.

Table 7 below shows the IES target average illumination levels for Class III and IV football and soccer play (see Appendix 6), as well as Musco's designed average.

**Table 7. IES sports field light levels versus Musco**

| | IES Class III Football and Soccer | IES Class IV Football and Soccer | Musco Photometrics, p. 2 |
|---|---|---|---|
| Target Average Illumination Levels | 30fc avg | 20fc avg | 54.71fc avg |

**Why does this matter?**

The current design is overlighting the area. Significant improvements to the project can be made by revising the design to meet the appropriate lighting targets, and by providing a system where light levels can be reduced to the appropriate light level depending on class of play. By reducing the overall field light level, the other lighting metrics will be decreased as well. These include glare, light trespass, and the potential negative effects on health.

## 2.6 Light Pollution/Sky glow

Completely absent from Musco's presentation of the design is any consideration or quantifiable evidence of the effect of the installation on light pollution (sky glow). In general, an evaluation of

[19] IES, RP-6-15 *Sports and Recreational Area Lighting*, 2015, p. 8.

light pollution, through a calculation of “uplight”, or light emitted above horizontal, is missing entirely from the report. The IES, Title 24, LEED and the CIE all provide some criteria upon which uplight can be quantified, and it is important that Musco provide evidence of the performance of their installation via photometric reports.

It is also important to note here that any calculation of uplight must take into account the angle at which the fixtures will be aimed upon installation. A particular fixture .ies file may show light above horizontal, but if the fixtures are then tilted, light above horizontal may be emitted.

**Why does this matter?**

While stargazing and the health of plants and animals may not be the primary concern for this project, it does not mean that the project will not have an adverse effect on this. So far, insufficient attention has been given to the impacts of the project on light pollution, and yet it must be considered as a factor. Light pollution is a significant concern in the effort to conserve our natural environment.

## 2.7 Light, health and schedule

The SI project must be carefully considered because it affects several factors that are important in resetting the circadian clock: ***quantity, spectrum, timing and duration.***

**Quantity**: The installation is adding a significant amount of additional light to the area.

**Spectrum**: The light is a cool-blue-enriched white (5700k) at which the circadian system is more sensitive.

**Timing**: The residents will be exposed to the lighting after dark

**Duration**: the lighting will be on regularly for hours at a time. The school is planning on using the lights 150 nights of the year, until 8:30 or 9:00 pm. More or less, this is the entire school year (September through May), and nearly 5 days a week. Based on when the sun sets, this means that the lights will be on between 2 and 4 hours every night of the school year.

Given that many residents likely have young children, who go to bed earlier than when the lights are scheduled to be turned off, this effectively eliminates darkness for their evenings.

**Why does this matter?**

As stated in the introduction the reduction of darkness at night has the potential to disrupt sleep, keep people awake and may have a direct negative impact on human health. The project should look at alternatives for minimizing the impacts of the lighting installation on the environment and consider the health of the neighborhood residents.

# 3. Conclusion

I disagree with St. Ignatius and Musco that the impacts of the lighting installation will not be significant. The analysis above shows that the project:

- Exceeds IES limits for light trespass
- Exceeds CIE limits for glare
- Exceeds IES recommendations for light levels near the residences
- Exceeds IES recommendations for Class III competitive play for a lower light level
- Fails to characterize the light pollution and uplight of the project

In my opinion, the foreseeable light pollution caused by the project, as demonstrated by the exceedances of the IES and CIE limits discussed above, is significant. The project will fundamentally change the nature of the neighborhood environment, particularly the residences across the street from the project. The project will adversely affect the aesthetics of the neighborhood by increasing glare and light pollution in the area. The quantity, timing, spectrum and duration of the lighting installation will have a deleterious effect on numerous environmental factors, especially the potential for sleep disruption and overall darkness of the environment.

The project proposal by Saint Ignatius and Musco has failed to adequately provide alternative solutions that will mitigate the most negative aspects of the installation. In several cases, the materials provided were insufficient or inadequate to confirm, independently that all steps have been taken to minimize negative impacts on the neighborhood. In the case of the renderings, the materials were misleading and were not produced in a way in which any reasonable conclusions could be drawn. In sum, the incomplete information provided makes it impossible to determine the extent of light pollution that will occur or what types of mitigation or alternatives could be utilized to avoid or substantially lessen the significant light pollution impacts that are likely to occur.

I recommend the study be revised and re-presented to include the following:

1. Provide .ies files and fixture cut sheets for independent verification/study of design proposal, and for confirmation that the fixtures are as well shielded as possible.
2. Provide aiming angles for the fixtures
3. Provide analysis of uplight caused by lighting
4. Provide information on the purpose and distribution of the lights at the different heights shown in Musco's drawing, particularly the ones at 16 and 65ft
5. Conduct a thorough visual analysis using computer software of the overall luminance and potential for glare from the perspective of the residents
6. Revise calculations to meet IES Class III sports lighting levels and provide ability to reduce further during Class IV play
7. Explore options for reducing the quantity of time and/or number of days in which the installation is used

Please feel free to contact me with any questions.

Signed,

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## EXPERIENCE

August 2020-present **Atelier Fos**, Alameda, CA | Principal and Owner
Founder of independent daylighting and lighting consultancy

June 2015-May 2020 **Integral Group, Inc.** Oakland, CA | Principal, Daylighting + Lighting

- Daylighting + Lighting team leader for the US West region
- Managed a team of 4 and over 30 active projects
- Lead Daylighting consultant for the US West region responsible for leading all work and directing simulations
- 10+ Net Zero Energy, 2 WELL and 15+ LEED (7 Platinum) lighting projects
- Project sizes ranging from 50,000 to 1,500,000 sq. ft.
- Daylighting design for complex facade and atrium conditions; landscape and exterior projects using daily illuminance values; glare analysis; glazing and shading recommendations; and daylighting for health and wellness
- Integrated design work with the building performance and sustainability teams to balance energy use and performance with daylighting performance
- Lighting and daylighting controls development
- Delivery of full lighting project documentation, specification, QA/QC and construction administration
- Proposal writing and business development
- Budgeting, forecasting, backlog, work planning

Aug 2009-May 2016 **Solemma, LLC (DIVA-for-Rhino)** Cambridge, MA | CMO, Co-Founder and Developer

- Original team member and core code developer
- Chief Marketing Officer responsible for external relations and website management

Aug 2010-May 2015 **Lam Partners, Inc.** Cambridge, MA | Lighting Designer and Project Manager
Project Manager and designer for over two dozen local, national and international projects ranging from sculptures to 200,000 square foot laboratories

- Concept design and presentation
- Project development and documentation
- Construction Administration including site visits for aiming
- Project management including budgeting and management of deliverables
- LEED documentation for daylighting and sustainable sites credit
- Advanced simulation of lighting and daylighting strategies

Mar 2008-Jul 2008 **TEN Arquitectos** Mexico City, Mexico | Architectural Designer
Designer, modeler, and renderer

Jan 2008-Mar 2008 **Celula Arquitectura** Mexico City, Mexico | Architectural Designer

Designer for the New Sustainable Convention Center in Cabo San Lucas Competition

Oct 2007-Jan 2008 **Machado Silvetti and Associates** Boston, MA | Architectural Designer
Team designer working on a new museum

Jan 2004 – May 2005 **Royer Architects** Newton, MA | Architectural Designer
Principal assistant to the architect for numerous new and renovation residential projects

Apr 2003-Dec 2003 **Community Design Partnership** Boston, MA | Urban Planner
Research and design support for community development plans and urban plans

Aug 2001-Apr 2003 **Kenyon C. Bolton III and Associates** Cambridge, MA | Architectural Designer
Designer for small high-end residential architectural firm

## EDUCATION

Fall 2005-Spring 2010 **Harvard University Graduate School of Design** Cambridge, MA
**Masters of Architecture, 2010**
Thesis | *Architectural Prestidigitation*
Advisor and Reader | Eric Höweler and Eve Blau

Fall 1997-Spring 2001 **The University of Michigan** Ann Arbor, MI
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Thesis| *Rafael Moneo: The Architectural Event*, Advisors| Robert Levit, Diane Kirkpatrick

## AWARDS

**IES Award of Merit, 2020**
Half Moon Bay Library, Half Moon Bay, CA

**Lighting Magazine 40 Under 40, 2018**
International and North America

**AL Design Awards, 2017 – Best Use of Daylighting**
Baylor University Paul L. Foster Campus for Business and Innovation

**IES Award of Merit, 2016**
Potamus Trading, Boston, MA

## PROFESSIONAL AFFILIATIONS

**LEEDUser Expert**
Interior Lighting Credit

**International Association of Lighting Designers**
Associate IALD

**Leadership in Energy and Environmental Design (LEED)**
LEED BD+C Accredited Professional

## PUBLICATIONS / LECTURES

May 2020 **Light and Health in Buildings**
IG Vision Webinar

March 2018 **Lighting the Way to Net-Zero Buildings**
Presented with Sara Lappano
Lightfair International 2018, Chicago, IL

November 2017 **Advanced Lighting Controls – Net Zero Energy Lighting**
Pacific Energy Center

November 2015 ***Light + Health, Research and Practice***
Presented with Celine Vetter and Dieter Lang
ABX Architecture Boston Expo, Boston, MA
***Is it worth it? Defending Shading Strategies on your Project***
Presented with Alejandra Menchaca and Rufei Wang
ABX Architecture Boston Expo, Boston, MA

August 2015 ***Integrating shading, lighting and glare - Achieving reliable results for clients***
14th International Radiance Workshop, Philadelphia, PA

November 2013 ***Media and Architecture Integration: New Territories for Lighting and Architecture***
Presented with Robert Osten
ABX Architecture Boston Expo, Boston, MA

August 2013 ***Early Phase Simulations & DIVA Demo***
12th International Radiance Workshop, 2013, NREL, Golden, CO

May 2012 ***New Modeling Methods in Daylighting Analysis***
Co-presented with Alstan Jakubiec and Jeff Niemasz
Lightfair 2012, Las Vegas, NV

August 2010 ***Animated Building Performance Simulation (ABPS) – Linking Rhinoceros/Grasshopper with Radiance/Daysim***
Publication in the Proceedings of SimBuild 2010, New York City, NY
8th International Radiance Workshop, 2009, Cambridge, MA

2012-present **Guest Lecturer and Critic**
Harvard University Graduate School of Design, Cambridge, MA
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Amherst College New Science Center
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Utile

Boston Public Library, Jamaica Plain Branch
Boston, MA
Utile

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Providence, RI
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Colgate University Admissions Building
Hamilton, NY
Sasaki Associates, Inc.

Confidential Educational Project*
Loomis, CA
Lake | Flato Architects

Contra Costa Community College
New Science Building*
Smith Group
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Dechert Boston
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Diablo Valley College Kinesiology and Art Buildings*
Pleasant Hill, CA
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Half Moon Bay Library*
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Oakland, CA
Cody Andersen Wasney

Presidio Knolls School*
San Francisco, CA
Studio Bondy

Piedmont USD STEAM and Theater Buildings*
Piedmont, CA
HKIT

Rainbow Recreation Center*
Oakland, CA
Byrens Kim

Sacred Heart School*
Atherton, CA
WRNS

UC Merced Downtown Campus*
Merced, CA
Heller Manus

UCSD Pepper Canyon*
San Diego, CA
Safdie Rabines Architects

Westfield State University Dorm
Westfield, MA
ADD, Inc. (now Stantec)

The Westminster Schools
Campbell Hall, Westminster Center Phase 1,
Stadium and Plaza

Atlanta, GA
Ennead

**CIVIC + COURTHOUSE**
Atherton Police Station and Civic Center*
Atherton, CA
WRNS

Elk Grove Community and Senior Center*
Elk Grove, CA
Group 4 Architects

Salem Probate and Family Court
Salem, MA
Perry Dean Rogers

**COMMERCIAL**
CBRE Offices
Boston, MA
Elkus Manfredi Architects

Confidential New Company Headquarters*
Vancouver, MA
Morphosis

Confidential New Office Building*
Redmond, WA
WRNS

Dudley Square Municipal Building
Boston, MA
Sasaki Associates, Inc.

East Bay Municipal Utility District*
Oakland, CA
EBMUD

Grande Cheese
Fond-du-Lac, WI
Overland Partners

Alameda County Information
Technology Department*
Oakland, CA
Komorous Towey Architects

Intuit Mountain View*
Mountain View, CA
WRNS

Loomis Sayles
Boston, MA
Gensler

Interface Global Headquarters
LEED and WELL Lighting Consultant*
Atlanta, GA
Perkins + Will

Nonprofits Insurance Alliance of California*
Santa Cruz, CA
EHDD

Potamus Trading
Boston, MA
Elkus Manfredi
**IES Award of Merit Winner, 2016**

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Perkins Eastman

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2060 Folsom*
San Francisco, CA
Mithun

Grande Cheese
Fond-du-Lac, WI
Overland Partners

Intuit Mountain View*
Mountain View, CA
WRNS

Maceo May Apartments*
Treasure Island, CA
Mithun

Pier 70 Building E2*
San Francisco, CA
MBH and Kennerly Architects

Nonprofits Insurance Alliance of California*
Santa Cruz, CA
EHDD

South San Francisco Caltrain Station
Pedestrian Plaza and Tunnel*
South San Francisco, CA
SWA Group

UCSD Pepper Canyon*
San Diego, CA
Safdie Rabines Architects

The Westminster Schools
Campbell Hall, Westminster Center Phase 1,
Stadium and Plaza
Atlanta, GA
Ennead

**RESIDENTIAL**
1700 Webster*
Oakland, CA
Perkins + Will

2060 Folsom*
San Francisco, CA
Mithun

Altamira Apartments*
Sonoma, CA
Pyatok Architects

Caritas Village*
Sonoma, CA
Pyatok Architects

Camp Southern Ground*
Fayetteville, GA
Perkins + Will

The Laureate*
Berkeley, CA
Pyatok

Maceo May Apartments*
Treasure Island, CA
Mithun
Paradise Valley Estates Senior and Memory Care*
Fairfield, CA
Perkins Eastman

Pier 70 Building E2*
San Francisco, CA
MBH and Kennerly Architects

Stanford University Faculty Housing*
Palo Alto, CA
Lum Architects

**LABORATORY**
CCC New Science Building
San Pablo, CA
Smith Group

LBNL Integrated Genomics Lab*
Berkeley, CA
Smith Group

Quest Diagnostics
Marlborough, MA
Gensler

Santa Rosa Junior College
New Science Building
Santa Rosa, CA
Smith Group

**MUSEUM, GALLERY AND SCULPTURE**
205 Alice Street*
Oakland, CA
Amato Architects

American Civil War Museum
Richmond, VA
Baskervill

Marriott Lobby Sculpture
New Delhi, India
Nikolas Weinstein

Peirce Hill
Singapore
Nikolas Weinstein

San Francisco Public Safety Building
Fallen Officer's Memorial
San Francisco, CA
Shimon Attie

Stubbs Road
Hong Kong
Nikolas Weinstein

**RETAIL**
Market Basket #66
Hooksett, NH
Prellwitz/Chilinski Associates, Inc.

**URBAN and FAÇADE**
Liberty Mutual Headquarters
Boston, MA
CBT/Childs Bertman Tseckares, Inc.

New Orleans Arena Façade Lighting
New Orleans, LA
Eskew Dumez + Ripple

New York Port Authority Bus Terminal
New York, NY
A2a Media

**TRANSPORTATION**
Greenville-Spartanburg Int'l Airport
Terminal Improvement Program
Greer, SC
Gensler

South San Francisco Caltrain Station
Pedestrian Plaza and Tunnel*
South San Francisco, CA
SWA Group

**DAYLIGHTING**

Arizona State University
Tempe, AZ
KPF

Baylor University
Paul L. Foster Campus for
Business and Innovation
Waco, TX
Overland Partners
**A|L Awards Best Use of Daylighting, 2017**

Cholera Treatment Center Pavilions*
Port-au-Prince, Haiti
MASS Design Group

Confidential New Company Headquarters*
Vancouver, MA
Morphosis

Confidential New Office Building*
Redmond, WA
WRNS

Confidential Office Building Renovation/Expansion*
Silicon Valley, CA
WRNS

Denver Water*
Denver, CO
RNL Architects

Harker School
San Jose, CA
Studio Bondy

Martin Luther King School*
Net Zero Energy Target
Cambridge, MA
Perkins Eastman

Oakland USD Madison*
Oakland, CA
Byrens Kim

Regen Projects Gallery
Los Angeles, CA
Michael Maltzan Architects

Ross School of Business – Phase 2
Ann Arbor, MI
KPF

Snowmass Condominiums*
Snowmass, CO
4240 Architecture

UMass Lowell Student Center
Lowell, MA
Perkins + Will

# Appendix 1

**Lighting Zone Definitions**

IES Outdoor Environmental Lighting Committee, *Lighting for Exterior Environments*, RP-33-14.
New York: Illuminating Engineering Society, 2014.

IES RP-33-14

# Lighting for Exterior Environments

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Prepared by:
The IES Outdoor Environmental Lighting Committee

Lighting zones are best implemented as an overlay to the established zoning especially in communities where a variety of zone districts exist within a defined area or along an arterial street. Where zone districts are cohesive, it may be possible to assign lighting zones to established land use zoning. It is recommended that the lighting zone includes churches, schools, parks, and other uses embedded within residential communities.

Lighting zones help communities minimize the contrast (and conflict) between extremes in lighting such as a brightly lighted car dealership adjacent to or within line of sight to a residential neighborhood, or a lighted sports facility in the middle of a residential neighborhood. Lighting zones may also determine restrictions on outdoor lighting that impact "places of sleep" such as residential areas, hospitals, and long term care facilities. Lighting zones may also employ vertical distinctions such as in mixed use facilities where the commercial aspects are on the street with residential units on the higher levels. Zones also encourage minimal changes in visual adaptation when traveling from site to site.

However, if an adjacent use could be adversely impacted by allowable lighting, the adopting authority may require that a particular site meet the requirements for a lower lighting zone. For example, the authority could specify Lighting Zone 1 or 2 requirements if a commercial development were adjacent to a residence, hospital or open space, or to any land assigned to a lower zone.

Community involvement is important in determining lighting zone issues, such as whether and how to light churches, schools, ice rinks, or playing fields. Among the factors that should be considered are neighborhood ambient conditions, lighting expectations, special environmental concerns, and how interior lighting may affect the exterior environment. Curfews and controls are appropriate for all lighting zones, and should be specified.

**2.5.1 Lighting Zone Definitions** Because identifying the appropriate outdoor lighting zone is a matter of judgment and consensus, there is no means of determining which zone is appropriate for a given area. The same type of lighting application may fall into different lighting zones in different jurisdictions or using different standards. As used in the *Joint IDA-IES Model Lighting Ordinance (MLO)*, the lighting zones are defined with suggested uses as follows:

› **LZ0:** No ambient light
Areas where the natural environment could be seriously and adversely affected by small amounts of electric lighting at night. This includes biological cycles of flora and fauna, and human enjoyment and appreciation of the natural environment. The vision of human residents and users is adapted to the total darkness, and they do not expect to see electric lighting. Human activity is sparse and is subordinate in importance to the natural environment. There is no expectation for electric lighting. Although some lighting is allowed, it is required to be controlled.

| | | |
|---|---|---|
| LZ-0 | Lighting Zone 0 should be applied to areas in which permanent lighting is not expected and when used, is limited in the amount of lighting and the period of operation. LZ-0 typically includes undeveloped areas of open space, wilderness parks and preserves, areas near astronomical observatories, or any other area where the protection of a dark environment is critical. Special review should be required for any permanent lighting in this zone. Some rural communities may choose to adopt LZ-0 for residential areas. | Recommended default zone for wilderness areas, parks and preserves, and undeveloped rural areas.<br><br>Includes protected wildlife areas and corridors. |

› **LZ1:** Low ambient light
Developed areas within a natural environment and areas of human activity that are inherently dark at night. Electric lighting at night could adversely affect the biological cycles of flora and fauna, or could interrupt the quiet, dark character of the area. The vision of human residents and users is adapted to the low light levels, and they do not expect to see electric lighting except where absolutely necessary to improve visibility and safety. In these limited areas, low light levels are appropriate. Lighting is expected to be non-continuous (i.e., pools of light rather than uniform lighting along a path or roadway). After curfew, both light levels and uniformity may be reduced in some areas.

| | | |
|---|---|---|
| LZ-1 | Lighting Zone 1 pertains to areas that desire low ambient lighting levels. These typically include single and two family residential communities, rural town centers, business parks, and other commercial or industrial/storage areas typically with limited nighttime activity. May also include the developed areas in parks and other natural settings. | Recommended default zone for rural and low density residential areas.<br>Includes residential single or two family; agricultural zone districts; rural residential zone districts; business parks; open space include preserves in developed areas. |

**Figure 11: Parking Lot located in a Lighting Zone 1 community. Aspen, CO.** (Image courtesy of N. Clanton)

› **LZ2:** Moderate ambient light
Areas of human activity (i.e., habitation, recreation and/or work) where electric lighting may be required for safety and convenience at night. The vision of human residents and users is adapted to moderate light levels, and they have moderate expectations of electric lighting. Lighting is expected to be non-continuous (e.g., pools of light at crosswalks or intersections, rather than uniform lighting along a path or street). After curfew, both light levels and uniformity may be reduced in some areas as activity levels decline.

| | | |
|---|---|---|
| LZ-2 | **Lighting Zone 2 pertains to areas with moderate ambient lighting levels. These typically include multifamily residential uses, institutional residential uses, schools, churches, hospitals, hotels/motels, commercial and/or businesses areas with evening activities embedded in predominately residential areas, neighborhood serving recreational and playing fields and/or mixed use development with a predominance of residential uses. Can be used to accommodate a district of outdoor sales or industry in an area otherwise zoned LZ-1.** | **Recommended default zone for light commercial business districts and high density or mixed use residentialdistricts.** Includes neighborhood business districts; churches, schools and neighborhood recreation facilities; and light industrial zoning with modest nighttime uses or lighting requirements. |

**Figure 12: Parking Lot in LZ 2 - Fully shielded, uniform distribution. Anchorage, AK** (Image courtesy of N. Clanton)

› **LZ3:** Moderately high ambient light
Areas of human activity (i.e., habitation, recreation and/or work) where electric lighting may be continuous and is required for safety and convenience at night. The vision of human residents and users is adapted to moderately high light levels, and they have moderate to high expectations of electric lighting. Lighting is expected to be continuous (e.g. lighting delivered fairly evenly along the length of a path or street). After curfew, both light levels and uniformity may be reduced in some areas as activity levels decline.

| | | |
|---|---|---|
| LZ-3 | **Lighting Zone 3 pertains to areas with moderately high lighting levels. These typically include commercial corridors, high intensity suburban commercial areas, town centers, mixed use areas, industrial uses and shipping and rail yards with high night time activity, high use recreational and playing fields, regional shopping malls, car dealerships, gas stations, and other nighttime active exterior retail areas.** | **Recommended default zone for large cities' business district.** Includes business zone districts; commercial mixed use; and heavy industrial and/or manufacturing zone districts. |

**Figure 13: A Long Term Care Facility in LZ 3 with well-shielded lighting – no uplight.** (Image courtesy of David Roederer)

› **LZ4:** High ambient light
Areas of high levels of human activity at night including significant interaction among pedestrians and/or vehicles. The vision of humans when outside is typically adapted to moderate light levels. Lighting is continuous and is required for safety and convenience. Expectations for man-made lighting are high, both in terms of light levels and uniformity along pathways or streets. However, both light levels and uniformity may be reduced after curfew hours in some areas as activity levels decline.

| | | |
|---|---|---|
| LZ-4 | **Lighting zone 4 pertains to areas of very high ambient lighting levels. LZ-4 should only be used for special cases and is not appropriate for most cities. LZ-4 may be used for extremely unusual installations such as high density entertainment districts, and heavy industrial uses.** | **Not a default zone.** Includes high intensity business or industrial zone districts. |

**Figure 14: Entertainment district in urban area in LZ 4.** (Image courtesy of N. Clanton)

# Appendix 2

**IES Lighting for Exterior Environments,**
**Table 5: Minimum Vertical Illuminance at any point**
**in the vertical plane of the property line**

IES Outdoor Environmental Lighting Committee, *Lighting for Exterior Environments*, RP-33-14.
New York: Illuminating Engineering Society, 2014.

IES RP-33-14

# Lighting for Exterior Environments

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**Figure 10: Light Trespass. Decorative globe allows light to spill onto the façade and also into residential windows.** (Image courtesy of Clanton & Associates)

underlie any restrictions. Refer to the *Joint IDA-IES Model Lighting Ordinance (MLO)* and *TM-15-11* for limits on luminaire BUG ratings, property line maximum illuminance, and lumen density per lighting zone. Lighting zones and the BUG rating system can provide the basis for restricting the brightness that should be tolerated in a specific environment. Within any category, a curfew time may be established, allowing higher lighting levels during those hours when the curfew is not in effect.

Since light trespass is extremely subjective, there is no single set of values or limits that will work in every situation. The report *IES TM-11-00/R11 Light Trespass: Research, Results and Recommendations*[26] suggests that light trespass can be evaluated by illuminance values measured at the eye in a plane perpendicular to the line-of-sight when looking at the brightest source in the field of view. This report also stresses the subjectivity of the research and how it may be affected by the personalities and desires of different individuals.

While these recommendations serve to reduce serious light trespass, their implementation is not a guarantee against objections. In some situations, such as a sports field in a small park closely surrounded by residences, no methods and combinations of lighting design, aiming, or control can provide for both safe play and satisfy some neighbors' desires for limited light trespass. Consensus solutions involving field locations, curfews to restrict the hours of nighttime use, glare abatement, or landscape screens should be reached by all the parties involved. Refer to **Table 5** below.

**Table 5 : Maximum Vertical Illuminance at any point in the vertical plane of the property line. (From Table F *Joint IDA-IES MLO*)**

| Lighting Zone 0 | Lighting Zone 1 | Lighting Zone 2 | Lighting Zone 3 | Lighting Zone 4 |
|---|---|---|---|---|
| 0.05 FC or 0.5 LUX | 0.1 FC or 1.0 LUX | 0.3 FC or 3.0 LUX | 0.8 FC or 8.0 LUX | 1.5 FC or 15.0 LUX |

## 2.5 Lighting Zones

Zoning is a well–established practice in community planning. The fundamental idea behind zoning is that it allows a community to determine and regulate appropriate types of use in different areas within its jurisdiction, for example to define acceptable land uses in different areas. Lighting zones, which reflect the base (or ambient) light levels desired by a community, work well with land use zones in setting limits on the type and amount of lighting that can be used in different areas. Using lighting zones allows a great deal of flexibility and customization without the burden of excessive regulation.

The choice of an appropriate lighting zone is a matter of judgment based on community priorities for any given area. It is recommended that the lowest reasonable lighting zone(s) be adopted. Selection of lighting zone or zones should be based not on existing conditions but rather on the type of lighting environments the jurisdiction seeks to achieve. For instance, new development on previously rural or undeveloped land may be zoned as LZ-1.

# Appendix 3

**LEED v4.1 Light Pollution Reduction**

**Table 4, Maximum vertical illuminance at lighting boundary, by lighting zone**

USGBC, “Light Pollution Reduction,” LEED BD+C New Construction, v4.1, 2020.

## Table 4. maximum vertical illuminance at lighting boundary, by lighting zone

| MLO lighting zone | Vertical illuminance |
|---|---|
| LZ0 | 0.05 fc (0.5 lux) |
| LZ1 | 0.05 fc (0.5 lux) |
| LZ2 | 0.10 fc (1 lux) |
| LZ3 | 0.20 fc (2 lux) |
| LZ4 | 0.60 fc (6 lux) |

# Appendix 4

**CIE 150, 2017**

**Table 3, Maximum values for luminous intensity of luminaires in designated directions**

Members of TC 5-28 “Guide on the Limitation of the Effects of Obtrusive Light”, *Guide on the limitation of the effects of obtrusive light from outdoor lighting installations, Second Edition*, CIE 150 2017. Vienna: Commission Internationale de L’Eclairage, 2017.

ISBN 978-3-902842-48-0
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International Commission on Illumination
Commission Internationale de l'Eclairage
Internationale Beleuchtungskommission

# TECHNICAL REPORT

## Guide on the Limitation of the Effects of Obtrusive Light, 2nd Edition

**CIE 150:2017**

UDC: 628.931
628.971

Descriptor: Artificial lighting: Design and calculation
Exterior lighting

**Table 3 – Maximum values for luminous intensity of luminaires in designated directions**

| Light Technical Parameter | Application Conditions | Luminaire group (projected area $A_p$ in m²) | | | | |
|---|---|---|---|---|---|---|
| | | $0<A_p\leq0{,}002$ | $0{,}002<A_p\leq0{,}01$ | $0{,}01<A_p\leq0{,}03$ | $0{,}03<A_p\leq0{,}13$ | $0{,}13<A_p\leq0{,}50$ |
| Maximum luminous intensity emitted by luminaire ($I$ in cd) | **Environmental Zone E0**<br>Pre-curfew:<br>Post-curfew: | 0<br>0 | 0<br>0 | 0<br>0 | 0<br>0 | 0<br>0 |
| | **Environmental Zone E1**<br>Pre-curfew:<br>Post-curfew: | $0{,}29\cdot d$<br>0 | $0{,}63\cdot d$<br>0 | $1{,}3\cdot d$<br>0 | $2{,}5\cdot d$<br>0 | $5{,}1\cdot d$<br>0 |
| | **Environmental Zone E2**<br>Pre-curfew:<br>Post-curfew: | $0{,}57\cdot d$<br>$0{,}29\cdot d$ | $1{,}3\cdot d$<br>$0{,}63\cdot d$ | $2{,}5\cdot d$<br>$1{,}3\cdot d$ | $5{,}0\cdot d$<br>$2{,}5\cdot d$ | $10\cdot d$<br>$5{,}1\cdot d$ |
| | **Environmental Zone E3**<br>Pre-curfew:<br>Post-curfew: | $0{,}86\cdot d$<br>$0{,}29\cdot d$ | $1{,}9\cdot d$<br>$0{,}63\cdot d$ | $3{,}8\cdot d$<br>$1{,}3\cdot d$ | $7{,}5\cdot d$<br>$2{,}5\cdot d$ | $15\cdot d$<br>$5{,}1\cdot d$ |
| | **Environmental Zone E4**<br>Pre-curfew:<br>Post-curfew: | $1{,}4\cdot d$<br>$0{,}29\cdot d$ | $3{,}1\cdot d$<br>$0{,}63\cdot d$ | $6{,}3\cdot d$<br>$1{,}3\cdot d$ | $13\cdot d$<br>$2{,}5\cdot d$ | $26\cdot d$<br>$5{,}1\cdot d$ |

NOTE 1 $d$ is the distance between the observer and the glare source in metres.
NOTE 2 A luminous intensity of 0 cd can only be realized by a luminaire with a complete cut-off in the designated directions.
NOTE 3 For further information, please refer to Annex C.

### 3.6.5.3 Limitation of the effects on transport systems

Limits apply where users of transport systems are subject to a reduction in the ability to see essential information. Table 4 gives values that are for relevant positions and for viewing directions in the path of travel.

**Table 4 – Maximum values of threshold increment and veiling luminance from non-road lighting installation**

| Light Technical Parameter | Road Classification[1] | | | |
|---|---|---|---|---|
| | No road lighting | M6 / M5 | M4/ M3 | M2 / M1 |
| Veiling luminance[2] ($L_v$) | 0,037 cd/m² | 0,23 cd/m² | 0,40 cd/m² | 0,84 cd/m² |
| Threshold increment | 15 % based on adaptation luminance of 0,1 cd/m² | 15 % based on adaptation luminance of 1 cd/m² | 15 % based on adaptation luminance of 2 cd/m² | 15 % based on adaptation luminance of 5 cd/m² |

[1] Road Classifications as given in CIE 115:2010 (CIE, 2010).
[2] The veiling luminance values specified in this table are based on a permissible TI value of 15 %.

### 3.6.5.4 Limitation of sky glow

Table 5 specifies maximum values of upward light ratio (ULR) of luminaires, without taking into account the effect of light reflected upwards from the ground that also contributes to sky glow. This is the traditional method to limit sky glow and suitable to compare different single luminaires.

# Appendix 5

**IES Lighting for Exterior Environments**
**Table 2b, Illumination Values**

IES Outdoor Environmental Lighting Committee, *Lighting for Exterior Environments*, RP-33-14.
New York: Illuminating Engineering Society, 2014.

IES RP-33-14

# Lighting for Exterior Environments

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Table 2a: Illumination Values.

| Applications and Tasks[a] | Notes | Horizontal ($E_h$) Targets: Category | <25 | 25-65 | >65 | Gauge | Vertical ($E_v$) Targets: Category | <25 | 25-65 | >65 | Gauge | Uniformity Targets[e] Over Area of Coverage[f]: 1st ratio $E_h$/2nd ratio $E_v$ if different uniformities apply: Max:Avg | Avg:Min | Max:Min | Typical Area of Coverage[g]: Task Area | Area |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **ACCENTING** | **Accenting influences observers' overall brightness perceptions and provides visual relief. Accenting is also used for visual attraction and wayfinding. Ref. to the *IES Lighting Handbook, 10th Edition Ch. 15*. These are criteria for consideration in any application. Extinguish at curfew.** | | | | | | | | | | | | | | | |
| • Art | **On artwork plane (typically vertical)** | | | | | | | see **IES HB 10e Table 15.2** | | | | | | | | |
| • Feature | **On wall plane or trees** | | | | | | | see **IES HB 10e Table 15.2** | | | | | | | | |
| • Important Focal Point | **On focal point plane (typically vertical)** | | | | | | | see **IES HB 10e Table 15.2** | | | | | | | | |
| • Performance Areas | **$E_h$ @pavement; $E_v$ @5' AFG** | see **IES HB 10e Table 15.2** | | | | | | see **IES HB 10e Table 15.2** | | | | | | | | |
| • Perimeter | **On wall plane or trees** | | | | | | | see **IES HB 10e Table 15.2** | | | | | | | | |
| **BUILDING ENTRIES** | **OUTDOOR** | | | | | | | | | | | | | | | |
| • Canopied Entries/Exits | **At dropoff curbs to entries under canopy. Also see BUILDING ENTRIES/No Cover and BUILDING ENTRIES/Porte Cocheres.** | | | | | | | | | | | | | | | |
| • High Activity[i] | **Curbs typified by periods of high pedestrian and vehicular traffic; $E_h$ @grade; $E_v$ @5' AFG in directions of ingress/egress** | | | | | | | | | | | | | | | |
| · LZ4[j] | | J | 20 | 40 | 80 | Avg | H | 10 | 20 | 40 | Avg | 4:1 | 2:1 | | | |
| · LZ3[j] (and LZ4 curfew) | | I | 15 | 30 | 60 | Avg | G | 7.5 | 15 | 30 | Avg | 4:1 | 2:1 (4:1) | | | |
| · LZ2[j] (and LZ3 curfew) | | H | 10 | 20 | 40 | Avg | F | 5 | 10 | 20 | Avg | 3:1 | 2:1 (4:1) | | | |
| · LZ1[j] (and LZ2 curfew) | | G | 7.5 | 15 | 30 | Avg | E | 4 | 8 | 16 | Avg | 3:1 | 2:1 (4:1) | | | |
| · LZ0[j] (and LZ1 curfew) | **Control with motion sensors** | F | 5 | 10 | 20 | Avg | D | 3 | 6 | 12 | Avg | 2:1 | | | | |
| • Medium Activity[i] | **Curbs typified by periods of medium pedestrian and vehicular traffic; $E_h$ @grade; $E_v$ @5' AFG in directions of ingress/egress** | | | | | | | | | | | | | | | |
| · LZ4[j] | | H | 10 | 20 | 40 | Avg | F | 5 | 10 | 20 | Avg | 4:1 | 2:1 | | | |
| · LZ3[j] (and LZ4 curfew) | | G | 7.5 | 15 | 30 | Avg | E | 4 | 8 | 16 | Avg | 4:1 | 2:1 (4:1) | | | |
| · LZ2[j] (and LZ3 curfew) | | F | 5 | 10 | 20 | Avg | D | 3 | 6 | 12 | Avg | 3:1 | 2:1 (4:1) | | | |
| · LZ1[j] (and LZ2 curfew) | | E | 4 | 8 | 16 | Avg | C | 2 | 4 | 8 | Avg | 3:1 | 2:1 (4:1) | | | |
| · LZ0[j] (and LZ1 curfew) | **Control with motion sensors** | D | 3 | 6 | 12 | Avg | B | 1 | 2 | 4 | Avg | 2:1 | | | | |
| • Low Activity[i] | **Curbs typified by periods of low pedestrian and vehicular traffic; $E_h$ @grade; $E_v$ @5' AFG in directions of ingress/egress** | | | | | | | | | | | | | | | |
| · LZ4[j] | | F | 5 | 10 | 20 | Avg | D | 3 | 6 | 12 | Avg | 4:1 | 2:1 | | | |
| · LZ3[j] (and LZ4 curfew) | | E | 4 | 8 | 16 | Avg | C | 2 | 4 | 8 | Avg | 4:1 | 2:1 (4:1) | | | |
| · LZ2[j] (and LZ3 curfew) | | D | 3 | 6 | 12 | Avg | B | 1 | 2 | 4 | Avg | 3:1 | 2:1 (4:1) | | | |
| · LZ1[j] (and LZ2 curfew) | | C | 2 | 4 | 8 | Avg | A | 0.5 | 1 | 2 | Avg | 3:1 | 2:1 (4:1) | | | |
| · LZ0[j] (and LZ1 curfew) | **Control with motion sensors** | B | 1 | 2 | 4 | Avg | - | 0 | 0 | 0 | | 2:1 | | | | |
| • Intercom call system access | **$E_v$ on call-interface device, unless self-illuminated** | | | | | | H | 10 | 20 | 40 | Avg | | 2:1 | | | |
| • Non-covered Entries/Exits | | | | | | | | | | | | | | | | |
| • Immediate Exterior | **Width of door; $E_h$ @grade at threshold; $E_v$ within 3' of threshold and @5' AFG in direction of ingress or security camera** | | | | | | | | | | | | | | | |
| · High activity[i] | **Entries/Exits typified by periods of high pedestrian traffic** | | | | | | | | | | | | | | | |
| LZ4[j] | | | 10 | 10 | 10 | Min | H | 10 | 20 | 40 | Avg | 4:1 | 2:1 | | | |
| LZ3[j] (and LZ4 curfew) | | | 10 | 10 | 10 | Min | G | 7.5 | 15 | 30 | Avg | 4:1 | 2:1 (4:1) | | | |
| LZ2[j] (and LZ3 curfew) | | | 10 | 10 | 10 | Min | F | 5 | 10 | 20 | Avg | 3:1 | 2:1 (4:1) | | | |
| LZ1[j] (and LZ2 curfew) | | | 10 | 10 | 10 | Min | E | 4 | 8 | 16 | Avg | 3:1 | 2:1 (4:1) | | | |
| LZ0[j] (and LZ1 curfew) | **Control with motion sensors** | | 10 | 10 | 10 | Min | D | 3 | 6 | 12 | Avg | 2:1 | | | | |
| · Medium Activity[i] | **Entries/Exits typified by periods of medium pedestrian traffic** | | | | | | | | | | | | | | | |
| LZ4[j] | | | 10 | 10 | 10 | Min | F | 5 | 10 | 20 | Avg | 4:1 | 2:1 | | | |
| LZ3[j] (and LZ4 curfew) | | | 10 | 10 | 10 | Min | E | 4 | 8 | 16 | Avg | 4:1 | 2:1 (4:1) | | | |
| LZ2[j] (and LZ3 curfew) | | | 10 | 10 | 10 | Min | D | 3 | 6 | 12 | Avg | 3:1 | 2:1 (4:1) | | | |
| LZ1[j] (and LZ2 curfew) | | | 10 | 10 | 10 | Min | C | 2 | 4 | 8 | Avg | 3:1 | 2:1 (4:1) | | | |
| LZ0[j] (and LZ1 curfew) | **Control with motion sensors** | | 10 | 10 | 10 | Min | B | 1 | 2 | 4 | Avg | 2:1 | | | | |

**Table 2b: Illumination Values.**

| Applications and Tasks[a] | Notes | Recommended Maintained Illuminance Targets (lux)[b,c,d] Horizontal ($E_h$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Gauge | Category | Vertical ($E_v$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Gauge | Uniformity Targets[e] Over Area of Coverage[f]: 1st ratio $E_h$/2nd ratio $E_v$ if different uniformities apply Max:Avg | Avg:Min | Max:Min | Typical Area of Coverage[g]: Task Area | Area |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Category | | | Gauge | Category | | | | Gauge | | | | | |
| • Non-covered Entries/Exits | (continued) | | | | | | | | | | | | | | |
| • Low Activity[i] | **Entries/Exits typified by periods of low pedestrian traffic** | | | | | | | | | | | | | | |
| • LZ4[j] | | | 10 | 10 | 10 | Min | E | 4 | 8 | 16 | Avg | 4:1 | 2:1 | | |
| • LZ3[j] (and LZ4 curfew) | | | 10 | 10 | 10 | Min | D | 3 | 6 | 12 | Avg | 4:1 | 2:1 (4:1) | | |
| • LZ2[j] (and LZ3 curfew) | | | 10 | 10 | 10 | Min | C | 2 | 4 | 8 | Avg | 3:1 | 2:1 (4:1) | | |
| • LZ1[j] (and LZ2 curfew) | | | 10 | 10 | 10 | Min | B | 1 | 2 | 4 | Avg | 3:1 | 2:1 (4:1) | | |
| • LZ0[j] (and LZ1 curfew) | Control with motion sensors | | 10 | 10 | 10 | Min | A | 0.5 | 1 | 2 | Avg | 2:1 | | | |
| • Paths to Curb | | | | | | | | | | | | | | | |
| • High activity[i] | **Entry paths typified by periods of high pedestrian traffic** | | | | | | | | | | | | | | |
| • LZ4[j] | | G | 7.5 | 15 | 30 | Avg | E | 4 | 8 | 16 | Avg | | 3:1 | | |
| • LZ3[j] (and LZ4 curfew) | | F | 5 | 10 | 20 | Avg | D | 3 | 6 | 12 | Avg | | 3:1 (6:1) | | |
| • LZ2[j] (and LZ3 curfew) | | E | 4 | 8 | 16 | Avg | C | 2 | 4 | 8 | Avg | | 3:1 (6:1) | | |
| • LZ1[j] (and LZ2 curfew) | | D | 3 | 6 | 12 | Avg | B | 1 | 2 | 4 | Avg | | 3:1 (6:1) | | |
| • LZ0[j] (and LZ1 curfew) | Control with motion sensors | C | 2 | 4 | 8 | Avg | A | 0.5 | 1 | 2 | Avg | | 3:1 (6:1) | | |
| • Medium Activity[i] | **Entry paths typified by periods of medium pedestrian traffic** | | | | | | | | | | | | | | |
| • LZ4[j] | | E | 4 | 8 | 16 | Avg | C | 2 | 4 | 8 | Avg | | 3:1 | | |
| • LZ3[j] (and LZ4 curfew) | | D | 3 | 6 | 12 | Avg | B | 1 | 2 | 4 | Avg | | 3:1 (6:1) | | |
| • LZ2[j] (and LZ3 curfew) | | C | 2 | 4 | 8 | Avg | A | 0.5 | 1 | 2 | Avg | | 3:1 (6:1) | | |
| • LZ1[j] (and LZ2 curfew) | | B | 1 | 2 | 4 | Avg | - | 0 | 0 | 0 | | | 3:1 (6:1) | | |
| • LZ0[j] (and LZ1 curfew) | Control with motion sensors | A | 0.5 | 1 | 2 | Avg | - | 0 | 0 | 0 | | | 3:1 (6:1) | | |
| • Low Activity[i] | **Entry paths typified by periods of low pedestrian traffic** | | | | | | | | | | | | | | |
| • LZ4[j] | | C | 2 | 4 | 8 | Avg | C | 2 | 4 | 8 | Avg | | 3:1 | | |
| • LZ3[j] (and LZ4 curfew) | | B | 1 | 2 | 4 | Avg | B | 1 | 2 | 4 | Avg | | 3:1 (6:1) | | |
| • LZ2[j] (and LZ3 curfew) | | A | 0.5 | 1 | 2 | Avg | A | 0.5 | 1 | 2 | Avg | | 3:1 (6:1) | | |
| • LZ1[j] (and LZ2 curfew) | | A | 0.5 | 1 | 2 | Avg | - | 0 | 0 | 0 | | | 3:1 (6:1) | | |
| • LZ0[j] (and LZ1 curfew) | Control with motion sensors | A | 0.5 | 1 | 2 | Avg | - | 0 | 0 | 0 | | | 3:1 (6:1) | | |
| • Porte Cocheres | **$E_h$ @grade; $E_v$ @5' AFG in directions of ingress/egress and security camera** | | | | | | | | | | | | | | |
| • High Activity[i] | **Porte cocheres typified by periods of high pedestrian and vehicular traffic** | | | | | | | | | | | | | | |
| • LZ4[j] | | L | 37.5 | 75 | 150 | Avg | J | 20 | 40 | 80 | Avg | | 2:1 | | |
| • LZ3[j] (and LZ4 curfew) | | K | 25 | 50 | 100 | Avg | I | 15 | 30 | 60 | Avg | | 2:1 (4:1) | | |
| • LZ2[j] (and LZ3 curfew) | | J | 20 | 40 | 80 | Avg | H | 10 | 20 | 40 | Avg | | 2:1 (4:1) | | |
| • LZ1[j] (and LZ2 curfew) | | H | 10 | 20 | 40 | Avg | G | 7.5 | 15 | 30 | Avg | | 2:1 (4:1) | | |
| • LZ0[j] (and LZ1 curfew) | Control with motion sensors | G | 7.5 | 15 | 30 | Avg | F | 5 | 10 | 20 | Avg | | 2:1 (4:1) | | |
| • Medium Activity[i] | **Porte cocheres typified by periods of medium pedestrian and vehicular traffic** | | | | | | | | | | | | | | |
| • LZ4[j] | | J | 20 | 40 | 80 | Avg | H | 10 | 20 | 40 | Avg | | 2:1 | | |
| • LZ3[j] (and LZ4 curfew) | | I | 15 | 30 | 60 | Avg | G | 7.5 | 15 | 30 | Avg | | 2:1 (4:1) | | |
| • LZ2[j] (and LZ3 curfew) | | H | 10 | 20 | 40 | Avg | F | 5 | 10 | 20 | Avg | | 2:1 (4:1) | | |
| • LZ1[j] (and LZ2 curfew) | | G | 7.5 | 15 | 30 | Avg | E | 4 | 8 | 16 | Avg | | 2:1 (4:1) | | |
| • LZ0[j] (and LZ1 curfew) | Control with motion sensors | F | 5 | 10 | 20 | Avg | D | 3 | 6 | 12 | Avg | | 2:1 (4:1) | | |
| • Low Activity[i] | **Porte cocheres typified by periods of low pedestrian and vehicular traffic** | | | | | | | | | | | | | | |
| • LZ4[j] | | H | 10 | 20 | 40 | Avg | F | 5 | 10 | 20 | Avg | | 2:1 | | |
| • LZ3[j] (and LZ4 curfew) | | G | 7.5 | 15 | 30 | Avg | E | 4 | 8 | 16 | Avg | | 2:1 (4:1) | | |
| • LZ2[j] (and LZ3 curfew) | | F | 5 | 10 | 20 | Avg | D | 3 | 6 | 12 | Avg | | 2:1 (4:1) | | |

**Table 2c: Illumination Values.**

| Applications and Tasks[a] | Notes | Recommended Maintained Illuminance Targets (lux)[b,c,d] Horizontal ($E_h$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Gauge | Vertical ($E_v$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Gauge | Uniformity Targets[e] Over Area of Coverage[f]: 1st ratio $E_h$/2nd ratio $E_v$ if different uniformities apply Max:Avg | Avg:Min | Max:Min | Typical Area of Coverage[g] Task Area | Area |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Category | | | | Category | | | | | | | | | |
| • Porte Cocheres | (continued) | | | | | | | | | | | | | | |
| · LZ1[i] (and LZ2 curfew) | | E | 4 | 8 | 16 | Avg | C | 2 | 4 | 8 | Avg | | 2:1 (4:1) | | |
| · LZ0[i] (and LZ1 curfew) | Control with motion sensors | D | 3 | 6 | 12 | Avg | B | 1 | 2 | 4 | Avg | | 2:1 (4:1) | | |
| • Site Gated Entries | | | | | | | | | | | | | | | |
| · Manned | | | | | | | | | | | | | | | |
| · Pedestrians | | | | | | | | | | | | | | | |
| · Credentialing area | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | F | 5 | 10 | 20 | Avg | F | 5 | 10 | 20 | Avg | 2:1 | 2:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | E | 4 | 8 | 16 | Avg | E | 4 | 8 | 16 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | D | 3 | 6 | 12 | Avg | D | 3 | 6 | 12 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | C | 2 | 4 | 8 | Avg | B | 1 | 2 | 4 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ0[i] (and LZ1 curfew) | | B | 1 | 2 | 4 | Avg | A | 0.5 | 1 | 2 | Avg | 2:1 | 2:1 (4:1) | | |
| · General area | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | D | 3 | 6 | 12 | Avg | D | 3 | 6 | 12 | Avg | 3:1 | 3:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | C | 2 | 4 | 8 | Avg | C | 2 | 4 | 8 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | B | 1 | 2 | 4 | Avg | B | 1 | 2 | 4 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | B | 1 | 2 | 4 | Avg | A | 0.5 | 1 | 2 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ0[i] (and LZ1 curfew) | | A | 0.5 | 1 | 2 | Avg | - | 0 | 0 | 0 | | 3:1 | 3:1 (6:1) | | |
| · Vehicles | | | | | | | | | | | | | | | |
| · Cars and light trucks | $E_v$ at height range representing windshield and driver's side window elevations for most cars and light trucks. | | | | | | | | | | | | | | |
| Credentialing area | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @4' AFG; $E_v$ @3'-5' AFG | H | 10 | 20 | 40 | Avg | G | 7.5 | 15 | 30 | Avg | 2:1 | 2:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @4' AFG; $E_v$ @3'-5' AFG | G | 7.5 | 15 | 30 | Avg | F | 5 | 10 | 20 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @4' AFG; $E_v$ @3'-5' AFG | F | 5 | 10 | 20 | Avg | E | 4 | 8 | 16 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @4' AFG; $E_v$ @3'-5' AFG | E | 4 | 8 | 16 | Avg | D | 3 | 6 | 12 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ0[i] (and LZ1 curfew) | | D | 3 | 6 | 12 | Avg | C | 2 | 4 | 8 | Avg | 2:1 | 2:1 (4:1) | | |
| General area | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @5' AFG; $E_v$ @3'-5' AFG | F | 5 | 10 | 20 | Avg | F | 5 | 10 | 20 | Avg | 3:1 | 3:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @5' AFG; $E_v$ @3'-5' AFG | E | 4 | 8 | 16 | Avg | E | 4 | 8 | 16 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @5' AFG; $E_v$ @3'-5' AFG | D | 3 | 6 | 12 | Avg | D | 3 | 6 | 12 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @5' AFG; $E_v$ @3'-5' AFG | C | 2 | 4 | 8 | Avg | B | 1 | 2 | 4 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ0[i] (and LZ1 curfew) | | B | 1 | 2 | 4 | Avg | A | 0.5 | 1 | 2 | Avg | 3:1 | 3:1 (6:1) | | |
| · Commercial vans/trucks | $E_v$ at height range representing windshield and driver's side window elevations for most commercial vans and trucks. | | | | | | | | | | | | | | |
| Credentialing area | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @8' AFG; $E_v$ @6'-9' AFG | H | 10 | 20 | 40 | Avg | G | 7.5 | 15 | 30 | Avg | 2:1 | 2:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @8' AFG; $E_v$ @6'-9' AFG | G | 7.5 | 15 | 30 | Avg | F | 5 | 10 | 20 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @8' AFG; $E_v$ @6'-9' AFG | F | 5 | 10 | 20 | Avg | E | 4 | 8 | 16 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @8' AFG; $E_v$ @6'-9' AFG | E | 4 | 8 | 16 | Avg | D | 3 | 6 | 12 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ0[i] (and LZ1 curfew) | | D | 3 | 6 | 12 | Avg | C | 2 | 4 | 8 | Avg | 2:1 | 2:1 (4:1) | | |
| General area | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @10' AFG; $E_v$ @6'-9' AFG | F | 5 | 10 | 20 | Avg | F | 5 | 10 | 20 | Avg | 3:1 | 3:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @10' AFG; $E_v$ @6'-9' AFG | E | 4 | 8 | 16 | Avg | E | 4 | 8 | 16 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @10' AFG; $E_v$ @6'-9' AFG | D | 3 | 6 | 12 | Avg | D | 3 | 6 | 12 | Avg | 3:1 | 3:1 (6:1) | | |

**Table 2d: Illumination Values.**

| Applications and Tasks[a] | Notes | Recommended Maintained Illuminance Targets (lux)[b,c,d]: Horizontal ($E_h$) Targets, Visual Ages of Observers (years) where **at least half** are: Category | <25 | 25-65 | >65 | Gauge | Vertical ($E_v$) Targets, Visual Ages of Observers (years) where **at least half** are: Category | <25 | 25-65 | >65 | Gauge | Uniformity Targets[e] Over Area of Coverage [f]: 1st ratio $E_h$/2nd ratio $E_v$ if different uniformities apply: Max:Avg | Avg:Min | Max:Min | Typical Area of Coverage[g]: Task Area | Area |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| • Site Gated Entries | (continued) | | | | | | | | | | | | | | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @10' AFG; $E_v$ @6'-9' AFG | C | 2 | 4 | 8 | Avg | B | 1 | 2 | 4 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ0[i] (and LZ1 curfew) | | B | 1 | 2 | 4 | Avg | A | 0.5 | 1 | 2 | Avg | 3:1 | 3:1 (6:1) | | |
| • Remote Monitored | | | | | | | | | | | | | | | |
| · Intercom call system | Highlight intercom call system unless internally illuminated. Coordinate lighting with camera location to avoid image washout. | | | | | | | | | | | | | | |
| LZ4[i] | $E_v$ on system hardware. | | | | | | G | 7.5 | 15 | 30 | Avg | 2:1 | 2:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_v$ on system hardware. | | | | | | F | 5 | 10 | 20 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_v$ on system hardware. | | | | | | E | 4 | 8 | 16 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_v$ on system hardware. | | | | | | D | 3 | 6 | 12 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ0[i] (and LZ1 curfew) | | | | | | | C | 2 | 4 | 8 | Avg | 2:1 | 2:1 (4:1) | | |
| · Pedestrians | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @3' AFG; $E_v$ @5' AFG | G | 7.5 | 15 | 30 | Avg | F | 5 | 10 | 20 | Avg | 2:1 | 2:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @3' AFG; $E_v$ @5' AFG | F | 5 | 10 | 20 | Avg | E | 4 | 8 | 16 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @3' AFG; $E_v$ @5' AFG | E | 4 | 8 | 16 | Avg | D | 3 | 6 | 12 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @3' AFG; $E_v$ @5' AFG | D | 3 | 6 | 12 | Avg | C | 2 | 4 | 8 | Avg | 2:1 | 2:1 (4:1) | | |
| · Vehicles | | | | | | | | | | | | | | | |
| LZ4[i] | $E_v$ on system hardware. | I | 15 | 30 | 60 | Avg | H | 10 | 20 | 40 | Avg | 2:1 | 2:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_v$ on system hardware. | H | 10 | 20 | 40 | Avg | G | 7.5 | 15 | 30 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_v$ on system hardware. | G | 7.5 | 15 | 30 | Avg | F | 5 | 10 | 20 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_v$ on system hardware. | F | 5 | 10 | 20 | Avg | E | 4 | 8 | 16 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ0[i] (and LZ1 curfew) | | E | 4 | 8 | 16 | Avg | D | 3 | 6 | 12 | Avg | 2:1 | 2:1 (4:1) | | |
| • Unmanned/unmonitored | | | | | | | | | | | | | | | |
| · Intercom call system access | Highlight security call system unless internally illuminated. | | | | | | | | | | | | | | |
| LZ4[i] | $E_v$ on system hardware, unless self-illuminated | | | | | | H | 10 | 20 | 40 | Avg | | 2:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_v$ on system hardware, unless self-illuminated | | | | | | G | 7.5 | 15 | 30 | Avg | | 2:1 | | |
| LZ2[i] (and LZ3 curfew) | $E_v$ on system hardware, unless self-illuminated | | | | | | F | 5 | 10 | 20 | Avg | | 2:1 | | |
| LZ1[i] (and LZ2 curfew) | $E_v$ on system hardware, unless self-illuminated | | | | | | E | 4 | 8 | 16 | Avg | | 2:1 | | |
| LZ0[i] (and LZ1 curfew) | | | | | | | D | 3 | 6 | 12 | Avg | | 2:1 | | |
| · Pedestrians | Lighting should address an area 5' by 5' centered on the intercom call system. | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @grade | E | 4 | 8 | 16 | Avg | | | | | | 2:1 | 3:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @grade | D | 3 | 6 | 12 | Avg | | | | | | 2:1 | 3:1 (6:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @grade | C | 2 | 4 | 8 | Avg | | | | | | 2:1 | 3:1 (6:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @grade | B | 1 | 2 | 4 | Avg | | | | | | 2:1 | 3:1 (6:1) | | |
| LZ0[i] (and LZ1 curfew) | | A | 0.5 | 1 | 2 | Avg | | | | | | 2:1 | 3:1 (6:1) | | |
| · Vehicles | Lighting should address an area 5' by 5' centered on the intercom call system. | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @grade | F | 5 | 10 | 20 | Avg | | | | | | 2:1 | 3:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @grade | E | 4 | 8 | 16 | Avg | | | | | | 2:1 | 3:1 (6:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @grade | D | 3 | 6 | 12 | Avg | | | | | | 2:1 | 3:1 (6:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @grade | C | 2 | 4 | 8 | Avg | | | | | | 2:1 | 3:1 (6:1) | | |
| LZ0[i] (and LZ1 curfew) | | B | 1 | 2 | 4 | Avg | | | | | | 2:1 | 3:1 (6:1) | | |

**Table 2e: Illumination Values.**

| Applications and Tasks[a] | Notes | Recommended Maintained Illuminance Targets (lux)[b,c,d] Horizontal ($E_h$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Vertical ($E_v$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Uniformity Targets[e] Over Area of Coverage [f]: 1st ratio $E_h$/2nd ratio $E_v$ if different uniformities apply: Max:Avg | Avg:Min | Max:Min | Typical Area of Coverage[g]: Task Area | Area |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Category | | Gauge | Category | | Gauge | | | | | |
| **FACADES** | | | | | | | | | | | | |
| • Facade Details or Features | **Key elements or details. Apply strategically to ≤25% of area of building facade. Uniformity ratios are cited here as guides when relatively uniform appearance is desired over the area of application.** | | | | | | | | | | | |
| • With Surface Reflectance ≥0.5 | **Lighter-toned facade materials** | | | | | | | | | | | |
| • High Activity[i] | | | | | | | | | | | | |
| • LZ4[j] | **Apply strategically to ≤25% of area of building facade.** | | | O | 100 | 200 | 400 | Max | | | | |
| • LZ3[j] (and LZ4 curfew) | **Apply strategically to ≤20% of area of building facade.** | | | N | 75 | 150 | 300 | Max | | | | |
| • LZ2[j] (and LZ3 curfew) | **Apply strategically to ≤15% of area of building facade.** | | | M | 50 | 100 | 200 | Max | | | | |
| • LZ1[j] (and LZ2 curfew) | **Apply strategically to ≤10% of area of building facade.** | | | L | 37.5 | 75 | 150 | Max | | | | |
| • LZ0[j] (and LZ1 curfew) | | | | - | 0 | 0 | 0 | | | | | |
| • Medium Activity[i] | | | | | | | | | | | | |
| • LZ4[j] | **Apply strategically to ≤25% of area of building facade.** | | | M | 50 | 100 | 200 | Max | | | | |
| • LZ3[j] (and LZ4 curfew) | **Apply strategically to ≤20% of area of building facade.** | | | L | 37.5 | 75 | 150 | Max | | | | |
| • LZ2[j] (and LZ3 curfew) | **Apply strategically to ≤15% of area of building facade.** | | | K | 25 | 50 | 100 | Max | | | | |
| • LZ1[j] (and LZ2 curfew) | **Apply strategically to ≤10% of area of building facade.** | | | J | 20 | 40 | 80 | Max | | | | |
| • LZ0[j] (and LZ1 curfew) | | | | - | 0 | 0 | 0 | | | | | |
| • Low Activity[i] | | | | | | | | | | | | |
| • LZ4[j] | **Apply strategically to ≤25% of area of building facade.** | | | K | 25 | 50 | 100 | Max | | | | |
| • LZ3[j] (and LZ4 curfew) | **Apply strategically to ≤20% of area of building facade.** | | | J | 20 | 40 | 80 | Max | | | | |
| • LZ2[j] (and LZ3 curfew) | **Apply strategically to ≤15% of area of building facade.** | | | I | 15 | 30 | 60 | Max | | | | |
| • LZ1[j] (and LZ2 curfew) | **Apply strategically to ≤10% of area of building facade.** | | | H | 10 | 20 | 40 | Max | | | | |
| • LZ0[j] (and LZ1 curfew) | | | | - | 0 | 0 | 0 | | | | | |
| • With Surface Reflectance <0.5 | **Darker-toned facade materials** | | | | | | | | | | | |
| • LZ4[j] | **Apply strategically to ≤25% of area of building facade.** | | | Q | 200 | 400 | 800 | Max | | | | |
| • LZ3[j] (and LZ4 curfew) | **Apply strategically to ≤20% of area of building facade.** | | | P | 150 | 300 | 600 | Max | | | | |
| • LZ2[j] (and LZ3 curfew) | **Apply strategically to ≤15% of area of building facade.** | | | O | 100 | 200 | 400 | Max | | | | |
| • LZ1[j] (and LZ2 curfew) | **Apply strategically to ≤10% of area of building facade.** | | | N | 75 | 150 | 300 | Max | | | | |
| • LZ0[j] (and LZ1 curfew) | | | | - | 0 | 0 | 0 | | | | | |
| • Medium Activity[i] | | | | | | | | | | | | |
| • LZ4[j] | **Apply strategically to ≤25% of area of building facade.** | | | O | 100 | 200 | 400 | Max | | | | |
| • LZ3[j] (and LZ4 curfew) | **Apply strategically to ≤20% of area of building facade.** | | | N | 75 | 150 | 300 | Max | | | | |
| • LZ2[j] (and LZ3 curfew) | **Apply strategically to ≤15% of area of building facade.** | | | M | 50 | 100 | 200 | Max | | | | |
| • LZ1[j] (and LZ2 curfew) | **Apply strategically to ≤10% of area of building facade.** | | | L | 37.5 | 75 | 150 | Max | | | | |
| • LZ0[j] (and LZ1 curfew) | | | | - | 0 | 0 | 0 | | | | | |
| • Low Activity[i] | | | | | | | | | | | | |
| • LZ4[j] | **Apply strategically to ≤25% of area of building facade.** | | | M | 50 | 100 | 200 | Max | | | | |
| • LZ3[j] (and LZ4 curfew) | **Apply strategically to ≤20% of area of building facade.** | | | L | 37.5 | 75 | 150 | Max | | | | |
| • LZ2[j] (and LZ3 curfew) | **Apply strategically to ≤15% of area of building facade.** | | | K | 25 | 50 | 100 | Max | | | | |
| • LZ1[j] (and LZ2 curfew) | **Apply strategically to ≤10% of area of building facade.** | | | J | 20 | 40 | 80 | Max | | | | |
| • LZ0[j] (and LZ1 curfew) | | | | - | 0 | 0 | 0 | | | | | |

**Table 2f: Illumination Values.**

| Applications and Tasks[a] | Notes | Recommended Maintained Illuminance Targets (lux)[b,c,d] Horizontal ($E_h$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Vertical ($E_v$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Uniformity Targets[e] Over Area of Coverage[f]: 1st ratio $E_h$/2nd ratio $E_v$ if different uniformities apply: Max:Avg | Avg:Min | Max:Min | Typical Area of Coverage[g]: Task Area | Area |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Category | | Gauge | Category | | Gauge | | | | | |
| **FACADES** | **Facade Details or Features (continued)** | | | | | | | | | | | |
| • Facade Fields | **Relatively large areas of facade or entire facade. Uniformity ratios are cited here as guides when relatively uniform appearance is desired over the area of application.** | | | | | | | | | | | |
| • With Surface Reflectance ≥0.5 | **Lighter-toned facade materials** | | | | | | | | | | | |
| · High Activity[i] | | | | | | | | | | | | |
| · LZ4[j] | | | | | L | 37.5 | 75 | 150 | Avg | 3:1 | 10:1 | |
| · LZ3[j] (and LZ4 curfew) | | | | | K | 25 | 50 | 100 | Avg | 3:1 | 10:1 | |
| · LZ2[j] (and LZ3 curfew) | | | | | J | 20 | 40 | 80 | Avg | 3:1 | 10:1 | |
| · LZ1[j] (and LZ2 curfew) | | | | | I | 15 | 30 | 60 | Avg | 3:1 | 10:1 | |
| · LZ0[j] (and LZ1 curfew) | | | | | - | 0 | 0 | 0 | | | | |
| · Medium Activity[i] | | | | | | | | | | | | |
| · LZ4[j] | | | | | J | 20 | 40 | 80 | Avg | 3:1 | 10:1 | |
| · LZ3[j] (and LZ4 curfew) | | | | | I | 15 | 30 | 60 | Avg | 3:1 | 10:1 | |
| · LZ2[j] (and LZ3 curfew) | | | | | H | 10 | 20 | 40 | Avg | 3:1 | 10:1 | |
| · LZ1[j] (and LZ2 curfew) | | | | | G | 7.5 | 15 | 30 | Avg | 3:1 | 10:1 | |
| · LZ0[j] (and LZ1 curfew) | | | | | - | 0 | 0 | 0 | | | | |
| · Low Activity[i] | | | | | | | | | | | | |
| · LZ4[j] | | | | | H | 10 | 20 | 40 | Avg | 3:1 | 10:1 | |
| · LZ3[j] (and LZ4 curfew) | | | | | G | 7.5 | 15 | 30 | Avg | 3:1 | 10:1 | |
| · LZ2[j] (and LZ3 curfew) | | | | | F | 5 | 10 | 20 | Avg | 3:1 | 10:1 | |
| · LZ1[j] (and LZ2 curfew) | | | | | E | 4 | 8 | 16 | Avg | 3:1 | 10:1 | |
| · LZ0[j] (and LZ1 curfew) | | | | | - | 0 | 0 | 0 | | | | |
| • With Surface Reflectance <0.5 | **Darker-toned facade materials** | | | | | | | | | | | |
| · LZ4[j] | | | | | N | 75 | 150 | 300 | Avg | 3:1 | 10:1 | |
| · LZ3[j] (and LZ4 curfew) | | | | | M | 50 | 100 | 200 | Avg | 3:1 | 10:1 | |
| · LZ2[j] (and LZ3 curfew) | | | | | L | 37.5 | 75 | 150 | Avg | 3:1 | 10:1 | |
| · LZ1[j] (and LZ2 curfew) | | | | | K | 25 | 50 | 100 | Avg | 3:1 | 10:1 | |
| · LZ0[j] (and LZ1 curfew) | | | | | - | 0 | 0 | 0 | | | | |
| · Medium Activity[i] | | | | | | | | | | | | |
| · LZ4[j] | | | | | L | 37.5 | 75 | 150 | Avg | 3:1 | 10:1 | |
| · LZ3[j] (and LZ4 curfew) | | | | | K | 25 | 50 | 100 | Avg | 3:1 | 10:1 | |
| · LZ2[j] (and LZ3 curfew) | | | | | J | 20 | 40 | 80 | Avg | 3:1 | 10:1 | |
| · LZ1[j] (and LZ2 curfew) | | | | | I | 15 | 30 | 60 | Avg | 3:1 | 10:1 | |
| · LZ0[j] (and LZ1 curfew) | | | | | - | 0 | 0 | 0 | | | | |
| · Low Activity[i] | | | | | | | | | | | | |
| · LZ4[j] | | | | | J | 20 | 40 | 80 | Avg | 3:1 | 10:1 | |
| · LZ3[j] (and LZ4 curfew) | | | | | I | 15 | 30 | 60 | Avg | 3:1 | 10:1 | |
| · LZ2[j] (and LZ3 curfew) | | | | | H | 10 | 20 | 40 | Avg | 3:1 | 10:1 | |
| · LZ1[j] (and LZ2 curfew) | | | | | G | 7.5 | 15 | 30 | Avg | 3:1 | 10:1 | |
| · LZ0[j] (and LZ1 curfew) | | | | | - | 0 | 0 | 0 | | | | |

**Notes for Table 2.**

**Notes**

The table column headings are discussed in detail in the Illuminance Criteria Section. Refer to the discussion on procedures for establishing illuminance targets for a project.

**a.** Applications, tasks, or viewing specifics encountered on any given project may be different from these and may warrant different criteria. Refer to IES Lighting Handbook, Section 29.3.1 Applications and Tasks. The designer is responsible for making final determinations of applications, tasks, and illuminance criteria. Outdoor tasks are so noted.

**b.** Values cited are to be maintained over time on the area of coverage.

**c.** Values cited are consensus and deemed appropriate for respective functional activity. In a few situations, code requirements are within 10% of IES recommendations. This is apparently an artifact of metrification. Footcandle conversions of any values cited in this table should be made at 1 fc to 10 lx. Regardless, codes, ordinances, or mandates may supersede any of the IES criteria for any of the applications and tasks and the designer must design accordingly.

**d.** Targets are intended to apply to the respective plane or planes of the task.

**e.** Illuminance uniformity targets offer best results when planned in conjunction with luminance ratios and surface reflectances. Any parenthetical uniformity values reference respective parenthetical applications or tasks, such as a curfew situation associated with nighttime outdoor lighting.

**f.** Applications and tasks cited with a sunburst icon are candidates for strategies employing any combination of daylighting and electric lighting to achieve target values during daylight hours. Daylighting may require unconventional approaches.

**g.** The designer must establish areas of coverage to which targets apply. Green highlight identifies task proper or task area as the typical area of coverage for respective cited targets. Amber highlight identifies room or designated areas as the typical area of coverage for respective cited targets.

**h.** Nighttime illuminance targets are intended for application during dark hours of operations where lighting is deemed necessary or desirable. At curfew (client-or-jurisdiction-defined), if lighting is still deemed necessary or desirable, then reduce lighting as indicated.

**i.** See IES Lighting Handbook, 10th Edition, Table 22.4 - Indoor and Nighttime Outdoor Activity Level Definitions.

**j.** See IES Lighting Handbook, 10th Edition, Table 26.4 Nighttime Outdoor Lighting Zone Definitions. Nighttime illuminance targets are intended for application during dark hours of operation where lighting is deemed necessary or desirable. At curfew (client or jurisdiction defined), if lighting is still deemed necessary or desirable, then reduce lighting as indicated. See IES Lighting Handbook, 10th Edition, Table 26.5 Recommended Light Trespass Illuminance Limits.

# Appendix 6

**IES Sport and Recreational Area Lighting**
**Lighting for Outdoor Sports, 8.10 Football and 8.27 Soccer**

IES Sport and Recreational Area Lighting Committee, *Sports and Recreational Area Lighting*, RP-6-15. New York: Illuminating Engineering Society, 2015.

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# IES RP-6-15

# Sports and Recreational Area Lighting

Publication of this Recommended Practice
has been approved by IES.
Suggestions for revisions
should be directed to IES.

Prepared by:
The Sports and Recreational Area Lighting Committee of
the Illuminating Engineering Society of North America

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directional ground level sports the playing object is aimed at a fixed target near ground level (usually the target is in a vertical position). Vertical illuminance is critical at the target. It is normally provided by aiming luminaires (shielded from the players and spectators field of view) toward the target.

### 4.2 Players Skill and Performance

As the skill and performance of players increase, speed and accuracy also increases which in turn calls for higher illuminance levels and/or higher contrasts between the target and the background.

Visual targets (i.e., balls or pucks) of various sports are played at a wide range of speeds against various luminances and color backgrounds. In general, when the visual target is small, the difficulty of the seeing task increases. When the target travels at high speed and is viewed at close range, such as baseball, tennis, and racquetball, higher illuminance levels are required. However, when a golf ball is traveling in the air at high speed, its relative speed with respect to the observer is slow. Thus, lower illuminance levels are adequate for golf driving ranges and similar applications.

### 4.3 Spectators

Many sports are performed in the presence of spectators, particularly at high skill levels. As the number of spectators increases, seating becomes more remote from the playing area. The size of the visual target is then diminished in proportion to the square of the distance. This requires increased illuminance to compensate for the visual difficulty for the spectator. For large sport stadiums, illuminance is determined by the lighting required for the spectators seated farthest from the playing area. This condition may require several times the illuminance level found to be sufficient to the sport.

### 4.4 Classification of Play

The required quantity and quality of illuminance for a particular sport varies depending on the participant's skill level, age and the number of spectators attending the event. Additional considerations may include any requirements by individual sports organizations, video broadcasting, or TV broadcast.
In general, as the skill level is elevated, players and spectators require a better and more sophisticated luminous environment. A correlation exists between the size of a facility and the level of play; for example, a higher skill level attracts a greater number of spectators. In addition, a higher skill level may also have faster play, requiring increased illumination levels for the players, spectators, and broadcasting.

As the number of spectators increases, their distance from the playing surface increases; as a result, their need for higher illuminance to see players and tasks also increases. Accordingly, facilities should be designed to satisfy the most talented players and accommodate the greatest potential spectator capacity. It is important to note that in large facilities which seat over 5,000 spectators the lighting criteria are usually governed by the needs of television broadcasting requirements. Recommendations for such facilities are not covered in detail in this publication. To determine illumination criteria, this chapter groups facilities into four classes based on the skill levels of the players and the anticipated number of spectators.

- ***Class I*** *- Competition play before a large group (5000 or more spectators). Lighting criteria for major stadiums and arenas require special design considerations such as vertical and horizontal illuminance values not covered by this practice, which may be defined by individual sports governing bodies and/or broadcasting organizations.*

- ***Class II*** *- Competition play with facilities for up to 5000 spectators.*
- ***Class III*** *- Competition play with facilities for up to 2,000 spectators.*
- ***Class IV*** *- Competition or recreational play only (limited or no provision for spectators).*

Class IV lighting levels are suitable for play at fields that do not draw a large number of spectators. Many fields that host competitive play for adult recreational leagues will have very few spectators. Games for youth leagues will typically only be attended by family members of the participants.

| FACILITY | CLASS | | | |
|---|---|---|---|---|
| | I | II | III | IV |
| Professional | X | | | |
| College | X | X | | |
| Semi-Professional | X | X | | |
| Sports Clubs | X | X | X | |
| Amateaur Leagues | | X | X | X |
| High School | | X | X | X |
| Training Facilities | | | X | X |
| Elementary School | | | | X |
| Receational Event | | | | X |
| Social Event | | | | X |

Class I: Facilities with spectator capacity over 5,000
Class II: Facilities with spectator capacity under 5,000
Class III: Facilities with some provision for spectators
Class IV: Facilities with limited or no provision for spectators

**Table 2: Class of Play**

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Luminaire aiming should be from perpendicular to, or in the direction of travel, whenever possible to prevent disability glare for participants. Also, it is critical that the driver has an unhampered view of the staging lights at the starting line.

**8.9.1 Field Hockey** Field hockey is a multi-directional ground-level sport played at moderate speed with a ball approximately the size of a baseball.

Pole arrangements are similar to football. Spacing of poles should be proportionally similar starting from the end line.

Recommended illuminance levels are:

***Class II*** *- Horizontal illuminance: 500 lux. (50 fc.)*
*CV = 0.21 or less. ($E_{max}/E_{min}$ = 2.5:1 or less)*

***Class III*** *- Horizontal illuminance: 300 lux. (30 fc.)*
*CV = 0.25 or less. ($E_{max}/E_{min}$ = 3:1 or less)*

***Class IV*** *- Horizontal illuminance: 200 lux. (20 fc.)*
*CV = 0.30 or less. ($E_{max}/E_{min}$ = 4:1 or less)*

*Illuminance readings should be taken at a 1m (3') elevation on a 9m x 9m (30' x 30') grid.*

## 8.10 Football

Football is a multi-directional sport that combines aerial and ground play. The entire area should be uniformly illuminated. Canadian football is similar to American football with slightly different rules and field dimensions. Illuminance criteria and design considerations are similar.

**Figure 46: High School Football Field with 4 Pole Layout.**

Typical pole quantities vary from 4 – 8 poles. Poles should be set back behind the bleachers so spectator views are not obstructed. Locating poles in the corners of major stadiums is also an acceptable method, thus avoiding the long setback behind the grandstands. The main drawback to using a four pole layout is the need for taller poles and longer aiming throws for the floodlights. The height, offset and setback of pols may also be determined via stadium and site configurations.

Recommended illuminance levels are:

***Class I*** *- Horizontal illuminance: 1000 lux. (100 fc.)*
*CV = 0.13 or less. ($E_{max}/E_{min}$ = 1.7:1 or less)*

***Class II*** *- Horizontal illuminance: 500 lux. (50 fc.)*
*CV = 0.17 or less. ($E_{max}/E_{min}$ = 2.0:1 or less)*

***Class III*** *- Horizontal illuminance: 300 lux. (30 fc.)*
*CV = 0.21 or less. ($E_{max}/E_{min}$ = 2.5:1 or less)*

***Class IV*** *- Horizontal illuminance: 200 lux. (20 fc.)*
*CV = 0.25 or less. ($E_{max}/E_{min}$ = 3:1 or less)*

*Illuminance readings should be taken at a 1m (3') elevation on a 9m x 9m (30' x 30') grid.*

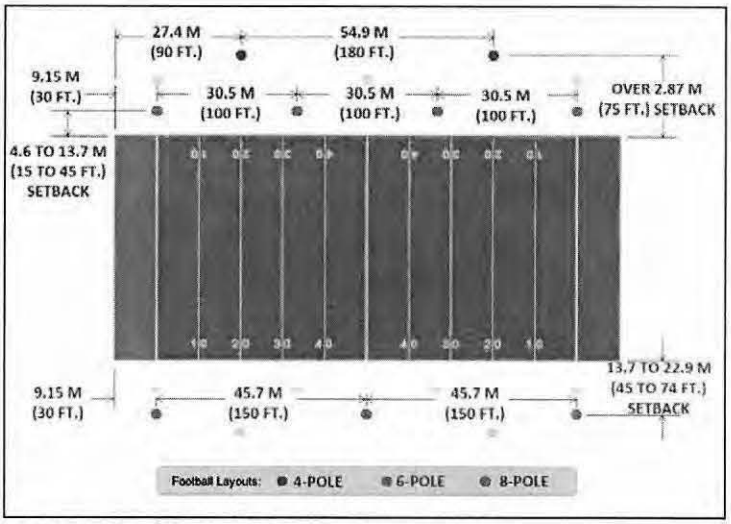


**Figure 47: Football Typical Pole Layouts.**

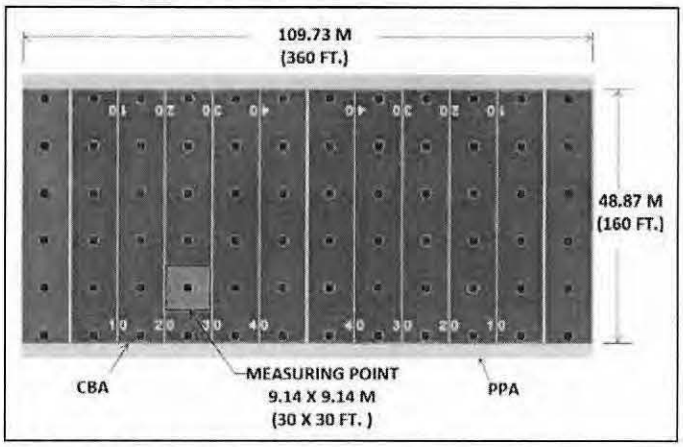


**Figure 48: Football calculation grid layout.**

## 8.11 Golf Courses

Golf is fundamentally a unidirectional and an aerial sport. The playing is divided into three separate parts: tee box, fairway, and green. The sport includes recreational and televised professional levels of play but night time play is limited to recreational levels. Recommendations for lighting are for participants only. The length of the golf holes

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this section are based on the guide lines developed by the National Ski Areas Association (NSAA) in association with the IES as shown in **Figure 73**.

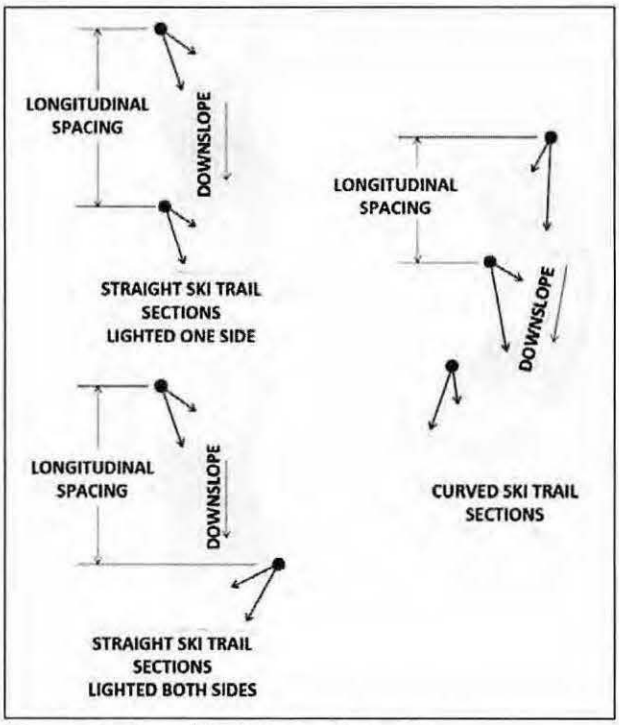


**Figure 73: Downhill Skiing pole locations.**

Vertical illuminance calculation should be undertaken at 1 meter (3.3') above the slope with the light meter pointing up the slope.

Uniform illuminance on all surfaces is not essential, and in fact, the terrain will be made more visible by the directionality of the light and its non-uniformity within the above parameters. Semi-directional illumination provides shading and modeling which aids in seeing the ski slope.

At ski areas where foggy conditions are common, it may be desirable to increase the minimum illuminance design to 3 lux (.3 fc). This will compensate for snowy or foggy conditions.

High pressure sodium is sometimes used for improved color contrast.

Aiming is generally a function of ski slope width, curvature and gradient. Aiming of luminaires should be in the general downhill direction (the direction of travel of the skier). Certain slope conditions and layouts may require aiming of luminaires other than downhill. Care should be used in aiming luminaires so as to minimize white-out and glare.

The effective pole height is used to determine longitudinal pole spacing. On slopes, the effective pole height should be as illustrated in **Figure 74**. This includes pole height above snow, snow depth and vertical differential between poles.

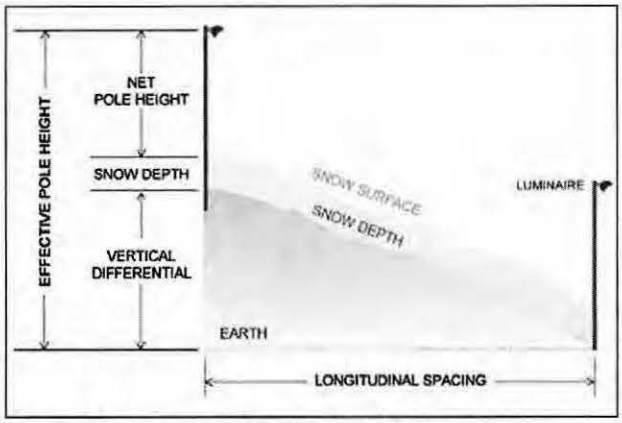


**Figure 74: Skiing - Effective Pole Height.**

Net pole heights should be determined from the requirements of coverage, beam spread, terrain and other conditions peculiar to the particular slope being lighted. In general, pole heights should not be less than 7.6 meters (25') above the average snow surface.

Recommended illuminance levels are:

***Class IV***

*Average maintained vertical illuminance:* *5 lux (0.5 fc)*

*Minimum vertical illuminance:* *2 lux (0.2 fc.)*

*Readings should be taken at 1m (3') elevation on a 9m x 9m (30' x 30') grid with the light meter pointing up the slope.*

## 8.27 Soccer

Soccer is a multi-directional ground level sport with the ball frequently being kicked very high into the air. Regulation soccer field size varies from a width of 59 to 69 meters and a length of 100 to 110 meters (328 to 361').

**Figure 75: Multi-field soccer complex.**

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Recommended illuminance levels are:

***Class I*** *– Horizontal illuminance: 1000 lux (100fc.) CV= 0.13 or less. ($E_{max}/E_{min}$ = 1.7:1 or less)*

***Class II*** *- Horizontal illuminance: 500 lux (50 fc.) CV = 0.21 or less. ($E_{max}/E_{min}$ = 2.0:1 or less)*

***Class III*** *- Horizontal illuminance: 300 lux (30 fc.) CV = 0.25 or less. ($E_{max}/E_{min}$ = 2.5:1 or less)*

***Class IV*** *- Horizontal illuminance: 200 lux (20 fc.) CV = 0.30 or less. ($E_{max}/E_{min}$ = 3:1 or less)*

*Illuminance readings should be taken at a 1m (3') elevation on a 9m x 9m (30' x 30') grid.*

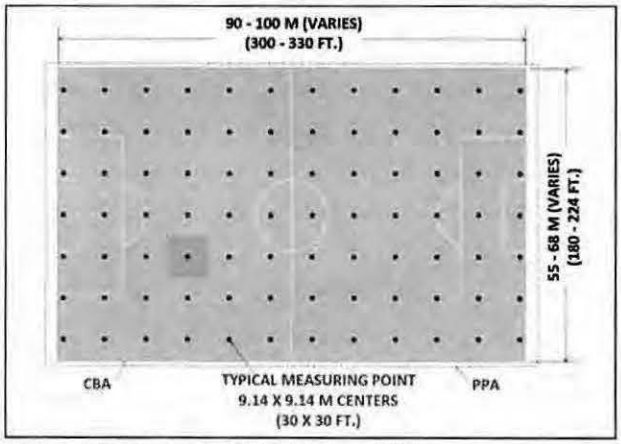


**Figure 76: Soccer - Calculation Grid.**

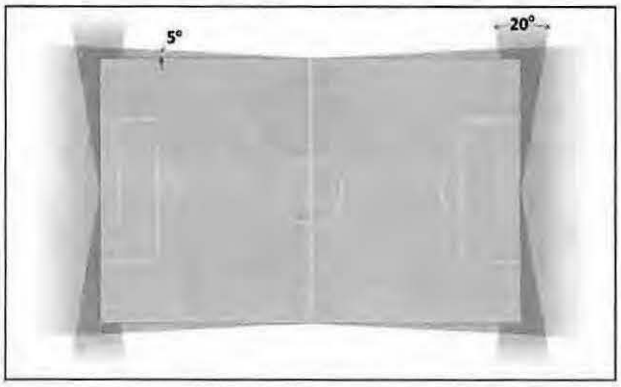


**Figure 77: Soccer Field Glare Zones.**

Poles or luminaires should not be placed in glare zones defined in **Figure 77**.

## 8.28 Softball

Softball is a multi-directional aerial sport similar to baseball except that it is played with a larger diameter ball on a smaller field. Softball field dimensions for either fast-pitch or slow-pitch vary with the league. The baselines are generally either 18.3 or 19.8 meters (60 or 65') and the outfield radius is usually between 61 and 91 meters (200 to 300').

Illuminance criteria are similar to those for baseball.

## 8.29 Swimming

***Class IV*** *– Private Community and Apartment Pool Decks:*

***Class II***
*Water Surface Luminance*
*161 candela per square meter*
*Water Surface Illuminance 300 lux (30 fc)*
*CV = 0.21 or less. (Emax/Emin = 2.5:1 or less)*

*Deck Surface Illuminance 200 lux (20 fc)*
*CV = 0.30 or less. (Emax/Emin = 4:1 or less)*

***Class III***
*Water Surface Luminance*
*108 candela per square meter*
*Water Surface Illuminance - 300 lux (30 fc)*
*CV = 0.25 or less. (Emax/Emin = 3:1 or less)*

*Deck Surface Illuminance 100lux (10 fc)*
*CV = 0.30 or less. (Emax/Emin = 4:1 or less)*

***Class IV***
*Water Surface Luminance*
*54 candela per square meter*
*Water Surface Illuminance 100 lux (10 fc)*
*CV = 0.30 or less. (Emax/Emin = 4:1 or less)*

*Deck Surface Illuminance 100 lux (10 fc)*
*CV = 0.30 or less. (Emax/Emin = 4:1 or less)*

*Illuminance readings should be taken at water and deck surface.*

Private community and apartment pools do not have the same lighting needs as public pools as they are for a more controlled group of users, familiar with the space and typically in smaller numbers. Adequate lighting is more of a security issue for observation with user safety being the prime consideration. Most security codes will use a minimum value of 1.0 fc on the deck surface as adequate lighting.

Illuminance readings should be taken on the deck surface, where people are looking when they move around (refer to **Section 5.5 Underwater Luminaires**.)

## 8.30 Tennis

Refer to **Section 7.28** for a general description of the sport, classification of play/facilities, definition of playing areas, and recommended reflectance value of surfaces. The illuminance values and uniformity ratios defined within the primary playing area (PPA–refer to **Annex D3** and **Annex G**) as shown are in general agreement with the United States Tennis Association (USTA).

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**September 17, 2020**

Attn: Angela Cavillo, Clerk of the Board of Supervisors
San Francisco City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102
Via email: Board.of.Supevisors@sf.org, bos.legislation@sf.org

**RE: Planning Case Number 2018-012648CUA - Saint Ignatius Stadium Lighting Project**

Honorable Members of the Board of Supervisors:

I am writing on behalf of the Saint Ignatius Neighborhood Association ("SINA") concerning the proposal to install stadium lighting towers and a wireless telecommunications facility at the J.B. Murphy Field Stadium ("stadium" or "field") of Saint Ignatius College Preparatory ("Saint Ignatius" or "school") located at 2001 37th Avenue. Saint Ignatius is a private secondary school located in a residential neighborhood in the Outer Sunset District.

SINA is an association comprised of over 165 neighbors who live in the area surrounding the school. The organization was formally registered as a community/neighborhood organization with the San Francisco Planning Department in October 2016.

The Planning Commission granted Conditional Use Authorization (Case No. 2018-012648CUA) for the stadium lighting project ("Project") on July 23, 2020 (Motion No. 20769). The Motion incorporated the Planning Department's June 3, 2020 CEQA categorical exemption determination. Pursuant to San Francisco Administrative Code Section 31.16(e), Mr. Michael Graf, Esq. on behalf of SINA filed a timely appeal of the CEQA exemption on August 24, 2020[1].

This letter provides additional information in support of the CEQA appeal. It expands upon SINA's previous submittals for the Project's Planning Commission hearings (Advance Materials submittal May 6, 2020 and supplements dated June 9, 2020[2] and July 22, 2020[3]) and includes results of CHEE's analysis of the proposed Project relevant to the CEQA appeal.

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[1]BOS File No. 200992 https://sfgov.legistar.com/View.ashx?M=F&ID=8761932&GUID=9AE437DD-D0C7-42DC-AEA3-0879363996D4
[2] Included as Exhibit J in the July 23, 2020 Commission hearing packet. https://commissions.sfplanning.org/cpcpackets/2018-012648CUAc1.pdf
[3] Available at https://docs.google.com/document/d/1tnLYBpZMoCu-rsKzRUBUmcrwfZ_lSXNcAwL3cmhrOgc/edit?usp=sharing

## Qualifications of the Center for Health, Energy & the Environment, LLC

The Center for Health, Energy & the Environment, LLC ("CHEE") is a boutique consulting firm specializing in environmental and regulatory analysis, permitting, and compliance monitoring. Our staff have over 40 years of technical expertise in regulatory interpretation including the National Environmental Policy Act (NEPA) and state equivalents; natural resource assessment and mitigation; construction and recreation planning and permitting; environmental monitoring and measurement; environmental data analysis; and reporting for compliance. We have provided services across more than 30 states including California for clients such as federal and state agencies, multi-national corporations, regional planning commissions, municipalities and non-profit organizations. A sample of CHEE's project experience relevant to this CEQA appeal is summarized in Attachment 1.

## Project Summary

The Project Sponsors (Saint Ignatius and Verizon Wireless) propose to add four 90-foot tall lighting towers to the stadium which borders Rivera Street and 39th Avenue. The lighting towers are intended to allow for up to 150 nights a year of weekday evening use for athletic practices, games and events lasting until 9 pm, and until 10 pm for up to 20 Friday or Saturday nights per year. In addition, on the proposed northwest light tower (at 39th Avenue near Quintara Street), the Project Sponsors seek to install and operate a wireless telecommunication service facility, consisting of antennas, remote radio units, and surge suppressors located at a height of 34 to 66 feet above ground on the tower, as well as ancillary equipment in a lease area located on the ground within a fenced compound adjacent to 39th Avenue near Quintara Street.

At this time there is no lighting at the stadium, which means the Project would constitute a significant expansion of use of the field on virtually every weekday evening in the late fall, winter, and early spring seasons, as well as on some weekends - from the time of sunset between 5 and 6 pm without field lights - to 9 to 10 pm under the proposed Project. The school currently has field lighting at their smaller practice field, authorized under a separate CUA (Case No. 2003.1273C, Motion No. 16770). Practice field lighting is authorized for use only until 7:30 pm.

## Additional information related to CEQA appeal filing

Section B.1.b of the CEQA appeal filing stated "There is a reasonable possibility that noise, parking, traffic, and public safety impacts caused by expanding use to games, events and practices until 9 or 10:00 pm nights a year may be significant."

CHEE has analyzed these factors and the discussions in Sections 1 and 2 below summarize our findings. We also offer additional input in Section 3 on another aspect of CEQA that is relevant to this Project, specifically the potential adverse effects on sensitive wildlife species due to the Project's lighting and noise impacts.

## 1. Noise - There is a Reasonable Possibility that Impacts will be Significant

CHEE conducted an analysis of expected noise levels for the Project and it is our opinion that stadium-related activities would exceed applicable noise thresholds by a factor of two to three, and noise levels would exceed ambient noise levels up to four times in the immediate neighborhood, resulting in a significant impact. Our analysis and conclusions are discussed below.

### a. Background

The Planning Department did not require a noise study for the Project, suggesting that no study was needed because there would be "no substantial permanent increase in ambient noise levels in the project vicinity or persons in excess of noise level standards". The CEQA exemption determination stated that the existing use of the athletic field would only be shifted from day time to evenings, and that a new public address "(PA") system would be installed and designed to direct sound away from the neighbors during games.

The Project Sponsors have provided no noise related information to support the Department's noise finding. In fact, there are no details about a purported new PA system, and no new system is explicitly included in the Project scope nor mentioned in any the CUA or CEQA application documents, nor in the Commission's CUA approval motion. Yet, the CEQA exemption assumes that a new system will be installed and that it will be an improvement over the existing PA system. Yet, CEQA requires that the effectiveness of mitigation measures be evaluated in a CEQA review process, not as part of an exemption determination.

The only available noise level information was provided at a September 15, 2015 neighborhood meeting (Appendix 4b of SINA's Planning Commission hearing submittal dated May 6, 2020) wherein the school's representatives 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." This statement does not support the idea of a new PA system. The school's representatives also indicated in that meeting's document that they had measured sound levels at an event and concluded that the sound level was not "excessive". Based on the lack of details provided, it cannot be assumed that the measurements were conducted in accordance with generally accepted standards for measuring noise or in accordance with the San Francisco Noise Guideline protocols[4].

Even if the measurements were valid, they cannot be considered representative of a game with high attendance such as a football game. The event was a "ProCamps" football camp[5] for children in grades 1 through 8. The noise measurements were taken on the second day of the event which was a Sunday in late June 2015. Images from the event (footnote 2) show that the school's bleachers were nowhere near full as they would be for a large football game, and it is not known whether the PA system was even in use at the time of noise measurement.

[4] https://www.sfdph.org/dph/files/EHSdocs/ehsNoise/GuidelinesNoiseEnforcement.pdf.
[5] https://www.ninersnation.com/2015/6/23/8829195/colin-kaepernicks-third-annual-procamps.

**b. Noise Level Analysis**

**Noise levels emanating from games at the Saint Ignatius athletic field would be significantly higher than ambient levels. Peak noise levels would be nearly quadruple ambient levels along 39th Avenue which is located within 50 feet of the edge of the playing field. Along Rivera Street, about 113 feet from the playing field, noise levels would be two to three times higher than ambient levels.**

It is the Project Sponsors' responsibility to conduct a valid noise study; however, CHEE has conducted a quantitative desktop analysis to estimate the potential noise levels for this Project. We reviewed available noise studies from CEQA Environmental Impact Reports (EIRs) conducted for similar high school stadium lighting projects to obtain a proxy for the range of noise levels that might be expected at this Project. Readily available noise studies were selected so as to be generally comparable to Saint Ignatius based on game attendance or spectator capacity, and similarity of the surrounding residential neighborhoods. Four comparative studies were selected:

- San Marin High School, Novato, CA[6]
- San Mateo High School, San Mateo, CA[7]
- Hillsdale High School San Mateo, CA[8]
- Aragon High School San Mateo, CA[9]

A subset of monitoring locations from each study was selected using those closest to neighboring residential streets, similar to the neighborhood locations of concern for the Saint Ignatius Project. Distances were taken from the study reports and adjusted so that each monitoring location is measured consistently from the nearest approximate edge of the football field playing surface to the monitoring location.

Table 1 presents a summary of the short term noise measurements (ranging from about 10 to 15 minutes each) that were obtained during varsity football games at each school. Measurements were taken for the PA system, crowd noise, game whistles, and in some cases for crowd and PA system noise combined. The values were recorded as the highest sound pressure level (Lmax) during the measuring period and reported in A-weighted decibels (dBA)[10]. Values were reported as a range of values or as discrete values at each monitoring location.

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[6] San Marin Stadium Lights Project Final Environmental Impact Report. May 2017. https://3b9svs2dfskd3fzwfu347pov-wpengine.netdna-ssl.com/wp-content/uploads/2019/10/SMHS-Project-Final-EIR-Sections-1-7.pdf.

[7] San Mateo Union High School District Draft Environmental Impact Statement. May 2016. https://www.smuhsd.org/cms/lib/CA02206192/Centricity/Domain/1242/Community_StaduimLights_CEQA_SMUHSDStadiumImprovementProjectDraftEIR.pdf and Initial Study. February 2016, see Appendix D in: https://www.smuhsd.org/cms/lib/CA02206192/Centricity/Domain/1242/Community_StaduimLights_CEQA_SMUHSDStadiumImprovementProjectDraftEIRAppendicesA-F.pdf.

[8] Ibid.

[9] Ibid.

[10] A-weighting accounts for the relative loudness perceived by the human ear at different frequencies on sound, and it discounts low frequencies since the ear is less sensitive to those frequencies.

**Table 1. Summary of Maximum Noise Levels during Comparable High School Football Games**
**(Note: "n/a" indicates no value was reported)**

| School | Day of Week and Time of Measurement | No. of Spectators | Monitoring Site No. and Location | $L_{max}$ dBA | | | |
|---|---|---|---|---|---|---|---|
| | | | | PA System | Crowd | Crowd + PA | Game Whistle |
| San Marin | Saturday 08/27/16 ~2-3:15 pm | 594 | ST1 – edge of property ~170 ft away from end of field | 62 | 70 | n/a | 72 |
| | | | ST3 – across street ~215 ft away from long side of field | 61 | 65 | n/a | 64 – 71 |
| | Saturday 11/05/15 ~2-3:15 pm | 1,200 | ST1 – edge of property ~170 ft away from end of field | 67 – 74 | 72 | n/a | 54 – 65 |
| | | | ST3 – across street ~215 ft away from long side of field | 57 – 64 | 60 – 70 | n/a | 61 |
| San Mateo | Friday 10/30/15 ~ 7-8 pm | Not stated, 3,136 capacity | ST1 – across street ~330 ft away from end of field | 57 | 64, 67 | 66 | n/a |
| | | | ST2 – across street ~190 ft away from long side of field | 60, 63, 64, 66 | 75 | n/a | 60, 60, 65, 66 |
| | | | ST3 – within property ~110 ft away from end of field | n/a | 66, 71, 74 | n/a | 63, 64, 66 |
| Aragon | Friday 11/06/15 ~ 8-8:30 pm | Not stated, 698 capacity | ST1 – across street ~150 ft away from end of field | 66, 65 – 72 | 73 | 88 - 91 | n/a |
| | | | ST2 – across street ~150 ft away from end of field | 56 – 60 | 59 | 61 | 53, 55 |
| Hillsdale | Friday 11/13/15 ~ 7:30-8 pm | Not stated, 988 capacity | ST2 – across street ~150 ft away from long side of field | 69 – 73 | 71 - 77 | 74 - 85 | n/a |
| | | | ST3 – across street ~160 ft away from end of field | 64 – 72 | 71 - 74 | 76 - 80 | n/a |

The data in Table 1 shows the maximum recorded noise levels at all four schools during the five different football games was: 72 dBA from whistles, 74 dBA from PA systems, 77 dBA from crowd noise, and 91 dBA for a PA system and crowd noise combined. These levels were recorded at distances ranging from approximately 110 feet to 330 feet from the edge of the playing fields.

At Saint Ignatius, the perpendicular distance from the edge of the west (long) side of the field to the adjacent sidewalk on 39$^{th}$ Avenue is approximately 48 feet, and approximately 113 feet to the adjacent sidewalk on Rivera Street from the edge of the field's south end. Sound levels attenuate (decrease) by 6 dB for each doubling of distance from a point source (e.g., PA system speaker). All other things being equal, noise levels emanating from the Saint Ignatius field during football games would be significantly higher than the Table 1 values since all of those measurements were taken at locations farther away from the source than the school property lines at 39$^{th}$ Avenue and Rivera Street.

The San Marin measurements in Table 1 were taken at two games with known spectator counts (594 and 1,200) and provide a general example of the minimum noise levels expected from the PA system, crowds, and game whistles at Saint Ignatius football games – with their higher expected attendance of 1,000 to 2,800 people (Exhibit A of Commission Motion No. 20769). Monitoring site ST1 was selected to represent Rivera Street, and site ST3 to represent 39$^{th}$ Avenue.

Aragon site ST1 was selected to represent to Rivera Street, and Hillsdale site ST2 to represent 39$^{th}$ Avenue for comparison of the combined crowd and PA system noise levels that were measured at those schools. Crowd size was not provided in those noise studies, but stadium capacity is smaller at both schools (698 at Aragon, 988 at Hillsdale) than Saint Ignatius, so again, the calculated equivalent noise levels are considered minimums for the purpose of estimating noise levels at Saint Ignatius.

Based on these considerations, the representative data from Table 1 was converted to equivalent noise levels at 39$^{th}$ Avenue and Rivera Street as shown in Table 2, using the formula:

$$Lp(R2) = Lp(R1) - 20 \times Log_{10}(R2/R1)$$

Where:

Lp(R1) = Sound pressure level at closer location
Lp(R2) = Sound pressure level at farther location
R1 = Distance from the noise source to closer location
R2 = Distance from noise source to the farther location

**Table 2. Calculated Maximum Noise Level Estimates at Saint Ignatius**

| Comparison Location | Study Location and Game | $L_{max}$ dBA at Comparison Location | | | |
|---|---|---|---|---|---|
| | | PA System | Crowd | Crowd + PA | Game Whistle |
| Rivera St. | San Marin ST1 small game | 65.6 | 73.6 | | 75.6 |
| | San Marin ST1 large game | 70.6 – 77.6 | 75.6 | | 57.6 – 68.6 |
| | Aragon ST1 | | | 90.5 – 93.5 | |
| 39th Ave | San Marin ST3 small game | 74 | 78 | | 77 - 84 |
| | San Marin ST3 large game | 70 – 77 | 73 – 83 | | 64 |
| | Hillsdale ST2 | | | 83.9 – 94.9 | |

The San Marin noise study also monitored noise at games and practices other than varsity football games. An hourly $L_5$ measurement was used which denotes the noise level exceeded 5% of the time within an hour-long measurement period. Table 3 shows the results converted to equivalent noise levels expected at Saint Ignatius although the San Marin study did not specify crowd size or whether the PA system was in use at the time.

**Table 3. Calculated 5% Exceedance Noise Level Estimates at Saint Ignatius**

| Comparison Location | Study Location | $L_5$ dBA at Comparison Location | | | |
|---|---|---|---|---|---|
| | | Varsity Football | Freshman and Junior Varsity Football | Non-Football Games | Practice |
| Rivera St. | San Marin ST1 | 74.6 | 68.5 | 67.6 | 60.6 |
| 39th Ave | San Marin ST3 | 84 | 79 | 78 | 65 |

### c. Discussion

**This analysis finds there is a reasonable possibility that noise impacts from the proposed Saint Ignatius Project would be significant, unavoidable, and are unlikely to be fully mitigated.**

In general, a 3 dB change in noise level is noticeable, and a 10 dB increase is perceived as a doubling of loudness[11]. Noise that occurs during the evening (7 – 10 pm) and night time (10 pm – 7 am) is considered more disturbing to people than the same level of noise occurring during the day since ambient noise levels are typically lower in the evening and night time than they are during the day, particularly in residential neighborhoods. Many noise ordinances account for this phenomenon using the Community Noise Equivalent Level (CNEL) which is a weighted sound level over a 24 hour period, including a "penalty" of 5 dB added between 7 and 10 pm and a penalty of 10 dB added for the nighttime hours of 10 pm to 7 am.

CEQA does not provide quantitative noise level threshold limits for determining the significance of a noise impact. Instead, CEQA refers to local ordinances, adopted agency standards, and the potential for a project to significantly increase noise levels above those present without the Project. The applicable local standards are the San Francisco Police Code (Article 1, Section 49, Article 15.1, and Article 29) and the San Francisco General Plan (Environmental Protection Element, Policies 10.1 and 11.1).

Under the San Francisco General Plan, Environmental Protection Element, Objective 10 seeks to minimize the impact of noise on affected areas [emphasis added] and Policy 10.1 promotes site planning, building orientation and design, and interior layout that will lessen noise intrusion.

Policy 11.1 discourages new uses in areas in which the noise level exceeds the noise compatibility guidelines for that use. The associated Land Use Compatibility Chart for Community Noise[12] identifies community noise exposures for various land use categories including outdoor spectator sports. The online chart shows that for outdoor spectator sports uses at all (background) community noise levels, new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design [emphasis added]. The associated Map 1[13] shows 24-hour average neighborhood ambient noise levels, penalized for night but not penalized for evening hours.

Ambient levels in the neighborhood immediately surrounding the Saint Ignatius stadium are shown in the Map to be approximately 55 to 60 dBA, with only the corner of Rivera Street near 37th Avenue in the 60 to 65 dBA range.

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[11] Cowan, James P. 2004. Handbook of Environmental Acoustics.
[12] https://generalplan.sfplanning.org/I6_Environmental_Protection.htm#ENV_TRA_10.
[13] https://generalplan.sfplanning.org/images/I6.environmental/ENV_Map1_Background_Noise%20Levels.pdf

San Francisco Police Code Article 29 Section 2909 regulates noise and the Noise Guideline[14] provides a table in Appendix A that lists applicable noise standards and thresholds for different sources of noise emission. There is no category for educational institutions nor is there an applicable exemption for schools, therefore the most applicable category is for commercial/industrial property noise which has a noise threshold not to exceed 8 dBA over ambient noise levels at the property line. That threshold is equivalent to 63 - 68 dBA for most of the immediate neighborhood surrounding the stadium.

Tables 2 and 3 above show that the estimated peak noise levels from games and even practices would exceed these ambient thresholds, creating two to four times the level of noise along 39th Avenue since each 10 dB increase in sound doubles the effect.

Appendix A of the Noise Guideline also specifies an 80 dBA maximum noise level from construction equipment between 7 am and 8 pm at a distance of 100 feet from the source. If the stadium lighting is installed, Saint Ignatius games and practices will last until after 8 pm and noise levels at the property line could far exceed even that high threshold for football games (Tables 2 and 3).

Furthermore, the CEQA exemption determination stated: "The new sound system would be designed to direct sound away from the neighbors during games". As noted above, even if a new PA system were to be installed, it would be extremely difficult if not impossible, to direct sound away from the neighbors and mitigate noise spillover into the neighborhood. To do so would require a sophisticated system design and moment-to-moment adjustments in the sound levels emanating from it. A PA system is intended to provide sound that is audible to fans on the bleachers located along both long sides of the stadium. Air temperature gradients and wind can steer sound in unintended directions, a particular problem during night football games, as cool fall air sits over surface level air that has been warmed all day by the sun. Moisture in the air will absorb high frequencies making amplification of voice announcements muddier and harder for fans to hear under fog conditions. To have clear intelligible spoken information, a PA system needs to be 6 to 10 decibels louder than crowd noise[15] which would further exacerbate overall sound levels during games.

There are few if any acoustic sound dampening elements at or around the school that would reduce noise spillover from the field into the surrounding neighborhood. There are only small shrubs bordering Rivera Street and only three street trees - one on Rivera Street and two on 39th Avenue – that could potentially help to mitigate some excess noise effects - but the CEQA determination notes that no streetscape changes are proposed for this Project. This issue is discussed in more detail in Section 1.c of CHEE's expert testimonial letter in support of the CUA appeal.

[14] Op. cit. Footnote 4.
[15] https://www.athleticbusiness.com/designing-sound-systems-to-meet-stadium-audio-challenges.html

### d. Noise Impact Conclusions

Each of the comparative four noise studies cited above found that noise impacts from lighted games and practices would exceed applicable noise thresholds and would be "significant and unavoidable".

It is important to note that Saint Ignatius has stated that part of the purpose of the lights is to increase attendance at games. The 2018 CUA application states: "The lights will enable the school to have night games; increasing parental participation at games…" Saint Ignatius' own estimate of current Saturday game attendance ranges from 750-1,000 historically and from 500 – 1,100 in 2019[16].

The Project permit proposal dated April 29, 2020 anticipated 800 – 1,500 spectators for night time football games. More telling is the school's Night Game or Large Event Management Plan[17] developed to manage games and events with "anticipated attendance of 1,000 to 2,800 people" [emphasis added]. Therefore, expected noise levels would be significantly higher for Friday night games than for the current Saturday games with lower attendance.

The comparison noise studies were conducted at games with attendance no more than 1,200 people (San Marin, Aragon, Hillsdale). Those noise levels, when converted to equivalent levels at Saint Ignatius as shown in Tables 2 and 3, are expected to be greatly exacerbated at Saint Ignatius with night game attendance that could double in size from current Saturday game attendance levels.

Neighbors have repeatedly reported their concerns and complaints about noise from day time practices and games, as well as from night time games that took place under temporary rented lights (see CEQA appeal filing, August 24, 2020). The complaints date back to 2015 when the Project was first proposed in letters to then Supervisor Katy Tang, and more recently in testimonial letters to the Planning Commission for the Commission hearing and to the Board of Supervisors for the appeals. Letters are included in Attachments 2-5 of SINA's appeal letter dated September 17, 2020. Neighbors have also provided video clips of noise from practices that document actual noise levels at neighboring homes. In summary, these testimonials provide additional substantial evidence that noise impacts are already significant and would be greatly exacerbated under expanded use of the athletic field.

**Therefore, this analysis finds that there is a reasonable possibility that noise impacts from the proposed Saint Ignatius Project would be significant, unavoidable, and not able to be fully mitigated.**

[16] Exhibit I in https://commissions.sfplanning.org/cpcpackets/2018-012648CUAc1.pdf
[17] https://www.siprep.org/uploaded/Misc/Large_Event_Plan_Writeup_ver2.pdf.

## 2. Traffic, Parking, and Public Safety - There is a Reasonable Possibility that Impacts will be Significant

CHEE conducted an analysis of expected parking and traffic impacts for the Project and it is our opinion that impacts would be significant due to local parking constraints, a lack of parking at the school, and Saint Ignatius' overly optimistic parking and traffic plan. Our analysis and conclusions are discussed below.

### a. Background

The Planning Department did not require a traffic and parking study for the Project. The CEQA exemption determination states that the proposed Project "would shift the existing use to later times in the day and/or days of the week".

However, the Project Sponsors stated in 2018: "We are obtaining a traffic and parking study as part of the Conditional Use Permit process" (CUA Informational and Supplemental Application Packet ,dated September 5, 2018). At the April 29, 2020 remote neighborhood meeting, the school representative stated that they had a "transportation and parking study" and would post it on their Good Neighbor website. No such study was ever provided, and the representative may have been referring to their Night Game and Large Event Management Plan posted on their website[18] or to their Campus Pick-Up and Drop-Off Plan filed as part of the original Project application (dated 10/31/2018)[19].

Saint Ignatius published their Large Event Management Plan in June 2020. It is important to note that the Plan was developed <u>after the Planning Department exempted the Project from CEQA review</u> [emphasis added]. The only traffic-related plan available for the CEQA review was the school's Campus Drop-off and Pick-up Management Plan. The drop-off plan only addresses procedures for students to be dropped off and picked up on 37th Avenue before and after school, including the use of buses to transport students to/from extra-curricular activities including games. There are no provisions in the drop-off plan for managing traffic during large events and night time games, <u>and the CEQA review was flawed in ignoring this important Project aspect</u> [emphasis added].

The Project Sponsors state that Saturday traffic and parking impacts would be reduced, and that weekday evening Project-related traffic "will depart and arrive after commute hour traffic on Sunset Boulevard has subsided" (draft Motion No. 20769, Exhibit I)[20].

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[18] Ibid.
[19] Available on the Accela website for the Project under CEQA documents, no weblink available.
[20] Op. cit. Footnote 17.

**b. Traffic and Parking Analysis**

**As discussed below, our analysis reveals that parking in the neighborhood is already limited and that the school's Large Event Management Plan is fatally flawed.**

Again, it is the Project Sponsors' responsibility to conduct a valid traffic and parking study; however, CHEE has conducted a qualitative desktop analysis to estimate the potential for traffic and parking impacts from the Project. We also peer reviewed the Large Event Management Plan and provide our quantitative and qualitative critique of the plan.

i. Street Parking Analysis

CHEE looked at actual parking levels around the school to estimate the existing and potential new parking impacts from the Project. Google Earth images were analyzed to identify varying levels of on-street parking use depending on school activities. Parked vehicles in the images were counted within the blocks immediately surrounding the school and public properties encompassing, clockwise from the northeast corner - 37th Avenue from Ortega to Rivera Streets, Rivera Street from 37th to 39th Avenues, 39th Avenue from Rivera to Quintara, Quintara between 39th and 41st Streets, 41st Avenue between Quintara and Ortega Streets, and Ortega Street between 41st and 37th Avenues (Figure 1 below).

**Figure 1. Parking Use Evaluation Area**

Four dates were selected from available Google Earth historical imagery to represent different conditions based on apparent field usage, as follows (see Figures 2 – 5 below):

- a pre-COVID school morning with no field activity
- a pre-COVID weekday after school with field activity (assumed to be a practice not a game based on level of activity)
- a Saturday afternoon football game when the public West Sunset playground soccer fields were also in use
- a post-COVID weekday morning

Time of day was estimated from the angle and direction of shadows cast from structures in each image. Trees or shadows precluded an accurate count in some locations on some dates, so those counts were adjusted slightly upward to assume that vehicles were present but not visible. Image quality also varied by date, but the images were zoomed and panned within Google Earth to allow for the most accurate counting possible along each street. Even in the images below, vehicles are clearly visible on surrounding streets. Results of the analysis are summarized in Table 4 and discussed below.

**Figure 2. Pre-COVID School Morning**

**Figure 3. Pre-COVID Afternoon Weekday Practice**

**Figure 4. Post-COVID Weekday Morning**

**Figure 5. Saturday Afternoon Football Game and Public Soccer Field Use**

**Table 4. Estimated On-street Parking Use on Streets Surrounding Saint Ignatius**

| Date | Location | Approximate Vehicle Count |
|---|---|---|
| Monday 9/23/2019<br>10 am<br>pre COVID school day | Rivera between 37th and 39th | 43 |
| | 39th between Rivera and Quintara | 42 |
| | Quintara between 39th and 41st | 14 |
| | Ortega between 37th and 41st | 50 |
| | 37th between Ortega and Rivera | 126 |
| | **Total** | **275** |
| Wednesday 11/2/16<br>5 pm<br>pre-COVID practice | Rivera between 37th and 39th | 33 |
| | 39th between Rivera and Quintara | 28 |
| | Quintara between 39th and 41st | 20 |
| | Ortega between 37th and 41st | 37 |
| | 37th between Ortega and Rivera | 137 |
| | **Total** | **255** |
| Thursday 4/2/2020<br>10 am<br>post-COVID<br>no school activity | Rivera between 37th and 39th | 23 |
| | 39th between Rivera and Quintara | 17 |
| | Quintara between 39th and 41st | 21 |
| | Ortega between 37th and 41st | 27 |
| | 37th between Ortega and Rivera | 12 |
| | **Total** | **100** |
| Saturday 9/11/10<br>2 pm<br>football game day and public field use | Rivera between 38th and 39th | 42 |
| | 39th between Rivera and Quintara | 52 |
| | Quintara between 39th and 41st | 45 |
| | Ortega between 37th and 41st | 56 |
| | 37th between Ortega and Rivera | 149 |
| | **Total** | **344** |

The table shows that on a typical Monday school morning (09/23/2019) approximately 275 parking spaces are in use. This number drops by only 20 vehicles (7%) to 255 vehicles in the afterschool 5 pm period (Wednesday 11/16/ 2016) with a small athletic field practice underway and no apparent use for the public fields or public schools.

This is not surprising considering that Saint Ignatius has 215 staff[21] not all of whom can be accommodated in the school's 65-space parking garage. There are also staff at the two public schools and Saint Ignatius students who park in the neighborhood that would leave at the end of the school day freeing up some parking spots. It is possible that some residents would have returned home by that time and some guests of residents could also arrive by 5 pm and use some of the available spaces. While difficult to discern from the scale of the Figures reproduced herein, the practice day appears to have approximately 22 people on the field (Figure 2).

[21] Op. cit. Footnote 19.

The available post-COVID image from April 2, 2020 taken shortly after the City's Shelter in Place Order took effect. It illustrates parking levels that are likely to be attributable only to local resident use, approximately 100 vehicles. Evening parking levels in a post-COVID world could be slightly higher due to some use by people visiting residents so parking capacity for evening school games would be somewhat less than shown.

After school parking use attributable to Saint Ignatius for a small field practice (11/16/2016) is still more than twice that of local resident parking use levels.

On the Saturday (09/11/2010) football game day with concurrent use at the West Sunset soccer fields, local parking use was 344 vehicles or more than 3 times the resident-only parking level on April 2, 2020. The soccer fields were in full use with perhaps 350 - 400 players and spectators, but the football stadium bleachers were only about half full.

It is important to note that the most recent football game day found on Google Earth was in September 2010 - ten years ago - and it is likely to under-represent more recent general use and football game parking levels. As noted above, the school expects night time football games to have significantly higher attendance levels than Saturday games. Therefore, it is likely that football game attendance, and hence parking pressure, was lower on that date than would be expected currently on a Friday night football game under stadium lights with the expected increase in attendance.

It is also important to note that there are no commercial businesses within these blocks - only residences, Saint Ignatius, two public schools, the West Sunset playground, a small public library, and a small public health center. Therefore, levels of parking activity at any time are unlikely to be attributable to commercial business in the neighborhood.

ii. Large Event Management Plan Summary

The Large Event Management Plan goal is to: "ensure a safe and minimal impact on our Community footprint" related to traffic, parking, security, and trash management for night football games and other large events with anticipated attendance from 1,000 up to 2,800.

The Plan also indicates that the school has only 65 onsite garage parking spaces. However, the it states that 37th Avenue between Ortega and Rivera Streets offers "exclusive use to accommodate capacity events". The school plans to obtain street closure permits for that area from the San Francisco Municipal Transportation Agency. Permits would restrict traffic and parking to event parking only. Additional parking is planned under rental agreements with the San Francisco Unified School District at the AP Giannini Middle School (at Ortega Street between 37th and 39th Avenues) when parking is available [emphasis added], and at the Robert Lewiston Stevenson Elementary School (at 34th Avenue between Pacheco and Quintara Streets). Saint Ignatius also plans to seek permits from the San Francisco Recreation and Parks Department for parking at the West Sunset playground parking lot on Quintara between 39th and 40th Avenues.

Under a street closure permit, the Plan states that 37th Avenue could accommodate up to 300 vehicles in three parking lanes between Pacheco and Rivera Streets, while retaining two

(southbound only) traffic lanes and keeping the intersections open at Pacheco, Quintara, and Rivera Streets. Vehicles would be able to exit those parking spaces into the two separate driving lanes "created by the distances between the three parking lanes".

The Plan also states that street closures would go into effect and vehicles would be "staged" along 37th Avenue between Ortega and Pacheco Streets starting 90 minutes before large games, or by 5:30 pm for a 7 pm game start time (according to the final project proposal)[22]. Vehicles would be directed to proceed south on 37th Avenue from Ortega Street toward Rivera Street and would be parallel parked in the three designated parking lanes from south to north, filling the parking lanes from Rivera back up to Pacheco. Ortega Street would not be used for parking.

iii. Large Event Plan Parking Data Analysis

Google Earth imagery shows at most 83 parking spaces at AP Giannini, although the Plan states that Saint Ignatius would also use the school yard (perhaps their own playing fields) for parking of 250-300 vehicles. There appears to be no off street parking at the Robert Lewis Stevenson Elementary School. We believe Saint Ignatius may have intended to refer to the Sunset Elementary School located next to AP Giannini although there are only 50 spaces there, and there are at most 20 spaces at the West Sunset Playground parking lot.

We analyzed parking capacity on 37th Avenue in the two blocks between Pacheco and Rivera Streets to assess the number of vehicles that could actually be accommodated in that area. The total length of 37th Avenue between Pacheco and Rivera is 1,200 feet, between pedestrian crosswalks on each block. The width of 37th Avenue between Pacheco and Quintara Streets is 45.6 feet, but only 40 feet between Quintara and Rivera[23].

The National Association of City Transportation Officials[24] recommends parking lanes of at least 7 to 9 feet wide, presumably for curbside lanes that allow for passenger side door opening onto a sidewalk.

Vehicle widths range from about 5.9 feet for a smaller vehicle to 6.7 feet for a full-size SUV, excluding side mirrors[25]. For this analysis, side mirrors are conservatively assumed to be 6 inches wide each based on actual measurement of a small car's side mirror (Toyota Corolla).

The two planned curbside parking lanes would then need to be about 8 feet wide to accommodate full-size SUVs and the planned center parking lane would need to be wider, perhaps as much as 13 feet wide, to allow for both side mirrors and for opening doors into the two planned travel lanes. This analysis assumes a minimum 2.5 feet would be needed on each side to allow both the driver and passengers to squeeze out of and later reenter their vehicles. Door opening may not be a concern during the parking phase with no traffic

[22] Op. cit. Footnote 17.
[23] https://striping.sfmta.com/drawings/01_Numbered_Avenue/37th%20Ave/37th%20Ave_Str-8026.1%20(Taraval%20St%20to%20Pacheco%20St).pdf
[24] https://nacto.org/publication/urban-street-design-guide/street-design-elements/lane-width/
[25] https://vehq.com/how-big-is-an-suv/

expected to be passing in the travel lanes, but safe distances for door opening into traffic would be needed as vehicles exit when a game is over, since there is no way for the school to orchestrate vehicle exits in the same manner or in the same order as vehicles had parked. The total width for all three parking lanes would therefore need to be at least 24 feet (ignoring center lane door openings) and most likely up to 29 feet (with allowance for door opening).

The San Francisco Fire Code Section 503.2.1 requires a minimum 20-foot wide unobstructed roadway for emergency vehicles under normal circumstances, a temporary special event street closure permit requires a minimum 14-foot emergency access lane [26].

Even in the best case scenario ignoring door opening allowances, three separate 8-foot wide parking lanes would leave only 21.6 feet between Pacheco and Quintara Streets and only 16 feet between Quintara and Rivera. With a minimum 14-foot travel width of at least one lane for emergency vehicles, two travel lanes cannot be accommodated as only 7.6 feet and 2 feet of width would remain for the second travel lane. Therefore, three separate parking lanes and two travel lanes are simply not possible.

Furthermore, the length of vehicles ranges between 16.0 feet (e.g., a small Honda Accord) to about 18.7 feet (a large Chevy Suburban)[27]. A typical US parallel parking space is 19 feet long plus a 4-foot front/back clearance for entering and exiting the space, or 23 feet total[28]. For the school's large events, vehicles could in theory be parked more closely than that, but since not all vehicles will exit in the order in which they parked, space must be allowed between vehicles. Given the 1,200-foot total length of 37th Avenue within the Plan's two-block parking area, approximately 52 vehicles could be parked in each row.

**c. Discussion**

**The Plan significantly over-estimates the number of vehicles that can accommodated for large football games and events. It also over-estimates the school's ability to adequately control excessive game-related traffic in the residential neighborhood, including during peak traffic times.**

Parking

Since three parking rows are not possible along 37th Avenue, only 104 vehicles could be accommodated in two parking lanes, not the 300 vehicles assumed in three lanes. The Plan does not seem to include a provision for parking vehicles between Ortega and Pacheco but even if that did occur, a maximum of 48 vehicles could be parked in two lanes since that block is slightly shorter, for a total of approximately 152 vehicles parked along 37th Avenue.

The Project Sponsors go so far as to state that "moving activities from Saturdays to Fridays [for football games] has the added benefit of reducing neighborhood weekend traffic as weekend crowds at West Sunset soccer fields can be quite large". We note that the public

[26] https://www.sfmta.com/sites/default/files/reports-and-documents/2017/11/specialevents_factsheet-1117_0.pdf
[27] Op. cit. Footnote 25.
[28] https://www.dimensions.com/element/parallel-parking-spaces-layouts

soccer field usage is not nearly as large as what would be expected for football games or other school events with attendance from 1,000 and up to 2,800. Further, while Saturday parking pressures may be reduced by moving large games to Friday nights, the school has not provided any data to quantify that benefit, nor have they provided any data on the number of vehicles expected for football games. Therefore, it is impossible to know what the true expected impact would be without a valid and robust traffic and parking study.

People are most likely to park as close to the stadium entrances as possible. Once the limited parking on 37th Avenue is full vehicles would search for and fill any available public parking spaces along Rivera Street and 39th Avenue first, then would search for and fill spaces on the streets that are slightly farther away. This will lead to potentially significant parking impacts throughout the neighborhood.

Traffic

The Plan calls for street closures and vehicle staging beginning 90 minutes prior to the 7 pm game start. Closures that begin at 5:30 pm on a Friday afternoon will coincide with the evening peak commuting time and adversely impact the non-game related normal traffic flow on the streets around the closed street and intersections. It is likely that traffic backups will occur at the intersections and potential safety issues will result as vehicles enter from Sunset Boulevard for staging on Ortega Street. Non-game driver confusion at the closed street and intersections will lead to increased traffic congestion in the surrounding neighborhoods and could create additional safety concerns as drivers search for alternate routes around the closures.

Neighbors have reported traffic congestion in the past, without the added traffic due to large games. At a July 7, 2020 remote meeting of representatives from the school and SINA that CHEE staff also attended, a neighbor noted: “There are often traffic conflicts at Sunset and Ortega, there have always been back ups there”. The school’s response was: “Yes, that is a perennial concern”. Yet there is no provision in the Large Event Plan to mitigate this concern.

Public Safety

The Plan indicates that 3 police officers and 10 security personnel will control traffic and parking but there are no specified qualifications for the non-police security personnel. It is common to see the effects of non-police traffic controllers that are poorly trained and unqualified at many road construction sites – they can greatly exacerbate traffic issues and create confusion and public safety concerns for drivers and workers alike by their lack of situational awareness, lack of understanding of basic traffic hand signals, and the resulting mis-communication with drivers.

San Francisco has a job description for a Parking Control Officer[29] which includes, among other tasks:

[29] https://www.jobapscloud.com/SF/specs/classspecdisplay.asp?ClassNumber=8214

- Direct vehicular and pedestrian traffic by using appropriate hand signals and whistle at a specific intersection or other control points
- Assists pedestrians in crossing from curb to curb at intersections
- Directs traffic at the perimeters of critical incidents, parades, and other public functions.
- Operates and monitors a 2-way radio to keep in contact with supervisors/managers
- Responds to complaints from the public and from departmental dispatchers
- Inform departmental supervisors and dispatch centers of any circumstances requiring police or emergency assistance

Qualifications include, among others:

- Ability to problem solve, accurately analyze situations, and take an effective course of action
- Communicate orally in a clear and effective manner to the general public, supervisors/managers, and other city departmental staff
- Tactfully, professionally, and effectively interact with parking violators, the general public, and other city departmental personnel
- Work independently with minimal supervision and under stressful and hostile conditions

Experience and training requirements (with some substitution allowed for directly related education) are:

- Two years of satisfactory public contact experience which must have included providing and/or verifying information on laws, rules, regulations, and procedures, or responding to client or customer complaints as a primary responsibility; or
- Successful completion of two (2) years military service either on active or reserve duty; or
- Six months of satisfactory experience as a class 8214 Parking Control Officer.

To ensure public safety, Saint Ignatius would need to carefully vet all outside security personnel applicants and ensure that they are fully qualified to manage the traffic and parking related to the large events. The Plan should include provisions for security pre-qualification, direct supervision, and prompt removal of underperforming individuals to ensure public safety and appropriately manage traffic inflow and outflow.

### d. Traffic and Parking Impact Conclusions

The CEQA exemption determination states that the Project does not propose additional parking. Given the school's own very limited parking, this is a gross oversight. Furthermore, the Commission Motion states that night time stadium use is not expected to adversely impact traffic and parking in the neighborhood. The Planning Department apparently relies upon the school's Large Event Management Plan and/or the Campus Drop-off and Pick up Plan as a means to ensure that impacts are managed, implying that there are, in fact, adverse impacts needing mitigation under the Plan. Yet, CEQA requires that the

effectiveness of mitigation measures be evaluated in a CEQA review process, not as part of an exemption determination.

The analysis above shows that even non-game parking is currently affected by school activities and would be greatly exacerbated by large Friday night football games; that the Plan greatly overestimates the amount of parking made available by street closures; and that the Plan itself is highly questionable in terms of the school's ability to control traffic and parking for these events in a way that protects public safety and ensures parking availability for residents.

Neighbors have repeatedly reported their concerns and complaints about parking, traffic, and public safety from day time practices and games, as well as from night time games that took place under temporary rented lights (see CEQA appeal filing, August 24, 2020). The complaints date back to 2015 when the Project was first proposed in letters to then Supervisor Katy Tang, and more recently in testimonial letters to the Planning Commission for the Commission hearing and to the Board of Supervisors for the appeals. Letters are included in Attachments 2 – 5 of SINA's appeal letter dated September 17, 2020. In summary, these testimonials provide additional substantial evidence that these impacts are already significant and would be greatly exacerbated under expanded use of the athletic field.

**Therefore, this analysis finds that there is a reasonable possibility that traffic and parking impacts from the proposed Saint Ignatius Project are likely be significant, unavoidable, and not able to be fully mitigated.**

## 3. Sensitive Species - There is a Reasonable Possibility that Impacts will be Significant

CHEE has reviewed information on the potential impacts of the stadium lighting Project on sensitive wildlife species, and it is our opinion that impacts from the Project's lighting and noise levels could be significant. The Planning Department completely ignored these potential impacts as part of the Project's categorical exemption, but these potential impacts are important and need to be considered and evaluated under a CEQA review.

### a. Background

The Project application ignores potential impacts to sensitive species although the 2015 Project Review Meeting submittal (2015-014427PRV) notes that Saint Ignatius is located within 300 feet of a possible urban bird refuge corridor along Sunset Boulevard[30].

The CEQA exemption determination is silent on sensitive species and the Planning Department's own Environmental Evaluation Screening Form used for project applications does not consider sensitive species at all, and only addresses tree removals or additions in the Biological Resources section. As if there are no concerns for wildlife within the City limits.

[30] https://sfplanning.org/sites/default/files/resources/2018-08/Urban%20Bird%20Refuge.pdf

However, Appendix G of the CEQA Guidelines[31] provides a CEQA checklist form which specifically includes consideration of project impacts on sensitive species including habitat modifications, interference with the movement of native or migratory species, or alteration of their movement corridors.

As with noise and traffic/parking it is the Project Sponsor's responsibility to evaluate these impacts. SINA submitted a summary of publicly available information on species that are documented or likely to be present in the immediate vicinity of Saint Ignatius, in order to point out the potential for Project impacts on them[32]. The following discussion expands upon and adds context and definition to that information.

### b. Data Sources

Species information for this review was obtained from several sources as noted in SINA's prior submittal. Numerous rare, threatened or endangered species are or may be present at or near the Project site.

- The US Fish and Wildlife Service's Information for Planning and Consultation (IPaC) online mapping system[33]. It provides information on the known or expected ranges of threatened and endangered species protected under the federal Endangered Species Act, and migratory birds protected under the federal Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act. SINA conducted an online data check on July 20, 2020. The federally-listed wildlife species that could be present and thus affected by activities in the 98-acre area surrounding the school and bounded by Ortega and Santiago Streets, and 36th and 41st Avenues include:
    - two mammals
    - six birds
    - two reptiles
    - one amphibian
    - five butterflies

  Some of the identified federally-listed species are also California state-listed species under the California Endangered Species Act[34]. These include four bird species and the San Francisco garter snake. Other state-listed species that are not also federally-listed may be present in the immediate school vicinity. Species information is not publicly available from the state's natural diversity database, and therefore not included in this analysis.

[31] California Code of Regulations Title 14, Division 6, Chapter 3, Appendix G. https://govt.westlaw.com/calregs/Document/I9D1077043F694621BD0D17A6E0616567?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)
[32] Op. cit. Footnote 3, Appendices B and C.
[33] https://ecos.fws.gov/ipac/
[34] https://wildlife.ca.gov/conservation/cesa

- The IPaC report also lists 24 species of migratory birds that could be present at certain times of the year. The list includes the state-endangered bald eagle and the state-threatened tricolored blackbird.
- The nationwide eBird website[35] compiles bird observation data and lists over 67 species of more common birds observed since 2015 at the West Sunset Playground, adjacent to Saint Ignatius.
- There are also 16 bat species reported within the Bay area[36] and at least four species within the City[37].
- Neighbor reports of nesting red tail hawks commonly seen in the trees by the Community Garden located just north of the school property. Owls have also been seen there. Neighbors also report killdeer grazing and eating bugs off the natural grass soccer fields and baseball field adjacent to the athletic field. Western snowy plovers, a federally threatened species, have also been observed nesting on flat roofs of some homes on 39th Avenue and in the surrounding neighborhood.

### c. Discussion

The high-intensity LED lighting specified for the Project brings adverse human and wildlife health effects that have not been addressed. The CEQA appeal supplement letter from Kera Lagios (dated September 11, 2020 and filed September 17, 2020), SINA's lighting expert, discusses the effects of light and the blue-ish light from LEDs in particular, on the circadian system of living organisms. She states: "Fundamentally, darkness is important because human beings, animals and plants have evolved biologically to take cues from the daily cycles of light and dark".

It has also been demonstrated that excess noise has adverse effects on wildlife. The increase in the Project's evening noise levels discussed in Section 1 above will occur virtually every evening of the week during the fall, winter and early spring which could have a significant impact on wildlife.

Extensive peer-reviewed literature is available [38, 39, 40, 41, 42, 43] that documents the adverse effects of excess light on wildlife, including:

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[35] https://ebird.org/hotspot/L6317907?yr=all&m=
[36] https://baynature.org/article/where-are-there-bats-in-the-bay-area/
[37] https://www.krauel.com/publications/Krauel2016plosone.pdf
[38] For instance, the Journal of Experimental Zoology Part A devoted an entire issue to Artificial Light at Night as an Environmental Pollutant. Volume 329 Issue 8-9, October/November 1, 2018. https://onlinelibrary.wiley.com/toc/24715646/2018/329/8-9
[39] https://www.researchgate.net/publication/272889669_Impacts_of_artificial_lighting_on_bats_A_review_of_challenges_and_solutions
[40] https://www.researchgate.net/profile/Michael_Salmon3/publication/235602286_Perry_G_B_W_Buchanan_R_Fisher_M_Salmon_and_S_Wise_2008_Effects_of_night_lighting_on_urban_reptiles_and_amphibians_Chapter_16_in_Urban_Herpetology_Ecology_Conservation_and_Management_of_Amphibians_and_/links/57486e6108aeae389f4e1792.pdf
[41] https://www.nature.com/articles/s41598-018-21577-6
[42] http://soundandlightecologyteam.colostate.edu/pdf/biologicalconservation2020.pdf
[43] http://soundandlightecologyteam.colostate.edu/pdf/insects2018.pdf

- Disruption of the nocturnal environment
- Attraction of sea birds and migratory birds to bright lights
- Alterations in amphibian, reptile, insect and pollinator behaviors
- Reproductive changes in many species
- Reduction in foraging and roosting behavior of bats

In addition, noise has adverse effects on wildlife. The National Park Service states: "Sound, just like the availability of nesting materials or food sources, plays an important role in the ecosystem. Activities such as finding desirable habitat and mates, avoiding predators, protecting young, and establishing territories are all dependent on the acoustical environment"[44]. Many studies indicate that animals, like humans, are stressed by noisy environments.

Shannon et al. 2015[45] conducted a systematic and standardized review of the 242 scientific studies published from 1990 to 2013 dealing with the effects of anthropogenic noise on wildlife. The majority of those studies documented effects of noise including:

- Altered vocal behavior
- Reduced species abundance in noisy habitats
- Altered predator-prey interactions due to inability to hear cues
- Changes in foraging behavior
- Impacts on individual fitness and the overall structure of ecological communities

That literature review showed that terrestrial wildlife responses begin at noise levels of approximately 40 dBA, and 20% of studies documented impacts below 50 dBA. Overall, 88% of reviewed studies reported a statistically measured biological response to noise exposure. For birds, changes in song characteristics, reproduction, abundance, stress hormone levels and species richness were documented at noise levels at or above 45 dBA. Terrestrial mammals showed increased stress levels and decreased reproduction at noise levels at or above 52 dBA.

The frequency and intensity of noise are also factors in wildlife responses to noise. Shannon et al. 2015 states: "Evidence suggests that the characteristics of the acoustic signal (e.g., frequency, duration, onset, intensity) and the biology of the species in question (e.g., hearing range, behavioral state, habitat, vocal behaviors) are important for predicting how noise is likely to affect a particular organism".[46]

### d. Sensitive Species Impact Conclusions

It is highly likely that the new high-intensity stadium lighting and nighttime noise levels would adversely impact at least some sensitive species that are dependent upon darkness and/or quiet for foraging, roosting and nesting, and migration. A full CEQA review would

[44] https://www.nps.gov/subjects/sound/effects_wildlife.htm
[45] Available for purchase from https://onlinelibrary.wiley.com/doi/abs/10.1111/brv.12207
[46] Ibid. at p. 988.

typically trigger endangered species consultation with the US Fish and Wildlife Service and California Department of Fish and Wildlife since such species are known or likely to be present (as discussed above).

Since the Planning Department exempted the Project from CEQA this consultation has not occurred and there is no information upon which to dismiss potential impacts on sensitive species. The presence of sensitive species must be investigated and potential adverse impacts of the stadium lighting project on them must be evaluated and mitigated to the extent possible.

The Planning Department must also support the City's Biodiversity Program and Biodiversity Policy (Board of Supervisors Resolution 107-18)[47] by providing robust oversight on projects that could imperil biodiversity. The Policy states: "In San Francisco, 95% of our land area is developed and its remaining natural heritage, including a dozen distinct ecological communities and several endangered species, is in a precarious state. From the Pacific Ocean to the Bay, the City is a unique natural environment worth protecting. The Planning Department has an important role (independently and in collaboration with our fellow City agencies) to help San Francisco be a sustainable and healthy city for all its inhabitants; human, animal, and plant."

**This analysis finds that there is a reasonable possibility that impacts on sensitive species from the proposed Saint Ignatius Project are likely be significant, unavoidable, and unable to be fully mitigated.**

After our in-depth review of available information and the analyses summarized above, it is my professional opinion that the Saint Ignatius Stadium Lighting Project has a reasonable potential to create significant adverse impacts on ambient evening noise levels in the neighborhood; to create significant traffic and parking problems throughout the neighborhood; and to adversely impact sensitive wildlife species due to both the lighting and noise.

Use of the athletic field would be expanded to 150 nights per year, or nearly every evening during the fall, winter and spring months with shorter daylight hours. The environmental impacts of this high level of new use have not been adequately evaluated. Therefore, we find that the Project should not have been categorically exempted from CEQA review and should be subject to a full CEQA review including preparation of a full Environmental Impact Report.

Sincerely,

Maryalice Fischer
Executive Director, CHEE LLC

Attachment 1. Abbreviated list of related CHEE projects

[47] https://sfgov.legistar.com/View.ashx?M=F&ID=6221173&GUID=F6DFAFED-8F3E-4615-AE74-86FA078A97EC

**Attachment 1**

**Abbreviated list of projects relevant to this CEQA appeal that were completed by CHEE, or independently by CHEE staff**

National Environmental Policy Act (NEPA)

- Conducted peer reviews and/or adequacy assessments of NEPA Environmental Impact Statements and Environmental Impact Reports prepared by others for over 70 development projects in 15 states.

Sensitive Species Assessment, Impact Analysis, and Mitigation

- Evaluated project compliance with the Endangered Species Act (ESA) and state-level ESA programs for over 100 sites in 25 states, as part of regulatory reviews and/or environmental compliance audits of federal installations and for private development projects.
- Rare, Threatened and Endangered Species Study. TransCanada. Coordinated multi-year studies to identify sensitive plant and wildlife species in 120 linear miles of habitat in two states. Managed teams of biologists in study design, procurement of species scientific collection permits, comprehensive field surveys, GIS-based habitat mapping, data analysis, and reporting.
- Tuberclid Orchid Recovery and Mitigation Program. US Generating Company (then a subsidiary of Pacific Gas & Electric Company). Managed five-year program to relocate and monitor state-endangered plant species to avoid adverse effects from development proposal.
- Natural Resources Inventory, Barrington NH, Strafford Regional Planning Commission. Completed municipal natural resources inventory report including GIS-based assessments and summary of the natural resource basis as part of the municipal Master Plan.

Traffic and Parking

- Recreation Area Planning, US Generating Company (then a subsidiary of Pacific Gas & Electric Company). Developed and coordinated implementation of 10-year comprehensive plan to improve and expand 17 public access recreation areas in two states. The project included evaluation of pre-existing traffic patterns and development of site-specific traffic improvements; coordination with state and local transportation departments to ensure that measures met applicable standards; evaluated parking needs and improvements to parking facilities; obtained federal, state and local permits for all ground-disturbing activities; conducted construction monitoring and oversight and post-construction maintenance and reporting on efficacy of the improvements. Other aspects of the project including aesthetic improvements and mitigation, and threatened and endangered species surveys and protection measures.
- Comprehensive Recreation Facility Needs Assessment. TransCanada. Managed multi-year study to assess recreation area adequacy and identify improvement needs at 48 public access recreation areas. Assessments including traffic counts, visitor surveys, parking and traffic flow evaluations, and development of a 370-page report detailing findings with recommendations for traffic, parking, and other recreation area improvements.

**Attachment 1**

**Abbreviated list of projects relevant to this CEQA appeal that were completed by CHEE, or independently by CHEE staff**

- Northwood Meadows State Park Discovery Day, NH Department of Parks and Recreation and Northwood Area Land Management Collaborative. Large event organization and management. Developed and implemented state-approved large event management plan. conducted traffic flow analysis; designed patterns for safe traffic flow, ingress and egress, and parking utilization; coordinated with state and local police and EMS agencies to ensure public safety and ease of access for emergency personnel and event attendees; and managed security team to ensure that traffic and parking requirements were enforced.
- Utility Traffic Control Program, Granite State Electric Company. Developed traffic control strategies for roadside construction projects. Developed written program for traffic control, trained utility workers in proper traffic control methods including situational awareness, hand signaling to workers and drivers, warning sign placement, and coordination with police during construction activities.
- Public Transit Human Services Transportation Plan. Alliance for Community Transportation and Rockingham and Strafford Metropolitan Planning Organizations. Facilitated the efforts of transportation providers in a 38-town region to coordinate public transit service as part of the region's Long Range Transportation Plan. Developed federally-compliant implementation plan; identified transportation needs of individuals with disabilities, older adults, and individuals with limited income; assessed available services and any gaps in service; and developed strategies for meeting those needs and prioritizing services throughout the region.

<u>Noise</u>

- Industrial Hygiene Hearing Conservation Program, New England Power Company: Developed and implemented corporate hearing conservation program. Conducted occupational exposure noise monitoring, determined noise thresholds requiring hearing protection, instituted audiometric testing program for workers, provided hearing conservation training program, and maintained records of noise levels and audiometric testing results.
- Large Event Noise Level Management and Control, various clients. Measured amplified sound levels; monitored compliance with applicable noise standards; and conducted continual active sound level control to remain within applicable standards at large indoor and multi-day outdoor venues, including among others:
    - Hampton Beach NH Seafood Festival
    - Salem MA Seafood Festival
    - South Berwick ME Strawberry Festival
    - Bentley's, Arundel ME
    - Lobster in the Rough, York ME

| | |
|---|---|
| **From:** | SISunsetNeighbors @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<br>BOS File #200992 and #200996 - SINA Commission Submittal 1 - 2020_05_06.pdf<br>BOS File #200992 and #200996 - SINA Commission Submittal 2 - 2020_06_09.pdf |

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

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

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Attached please find two documents that supplement the CEQA and CUA appeals filed under BOS File #200992 and #200996 for the Saint Ignatius Stadium Lighting Project.
These documents were originally submitted to the Planning Commission in advance of the 7/23/20 Commission hearing on the project.
We would like to put them in the Board of Supervisors records for our appeals.

Kindly confirm receipt.
Thank you

Deborah Brown, Secretary

SI Neighborhood Association

**May 6, 2020**

**Via Email To:**

Planning Commission Affairs Commissions.Secretary@sfgov.org
Jeff Horn, Senior Planner, Current Planning jeffrey.horn@sfgov.org

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

Dear Planning Commission Secretary and Mr. Horn,

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

## A: SUBMISSION IN ADVANCE OF THE PUBLIC HEARING

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

## B: REQUEST FOR CONTINUANCE

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

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

   Specifically, Saint Ignatius should prepare and provide:
   - A CEQA Environmental Impact Report to assess all potential impacts for their level of significance;
   - the traffic and parking study claimed to be completed;

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

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

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

**B: CONFLICT OF INTEREST**

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

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

Sincerely,

*Deborah Brown*

Deborah Brown, Secretary
Saint Ignatius Neighborhood Association
sisunsetneighbors@hotmail.com

Attachment: SINA Advance Submittal documentation

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

## Introduction

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

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

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

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

### Background

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

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

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

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

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

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

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

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

### Current Project Status

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

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

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

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

## Neighborhood Association Objections and Concerns

### Unclear and Misleading Project Communications

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

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

We believe this was very misleading.

**SI Seeking Stadium Lighting Approval During COVID 19 Crises**

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

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

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

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

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

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

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

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

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

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

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

**The Impact of Temporary Field Lighting**

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

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

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

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

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

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

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

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

## Summary

### The Impact of Permanent Stadium Lights

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

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

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

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

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

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

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

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

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

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

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

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

**Alternate Proposal**

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

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

SI responded that approach would not work for them.

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

## Additional Information

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

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

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

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

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

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

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

# ATTACHMENT 1

# MARIN COUNTY PLANNING DIVISION

# 2016 LETTER RE: MARIN CATHOLIC HIGH SCHOOL LIGHTING PROPOSAL

November 21, 2016

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

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

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

Dear Mr. Bentivoglio,

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

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

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

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

The following outlines a few of our key concerns:

**Light, Contrast, and Glare**

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

**Noise**

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

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

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

**Traffic**

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

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

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

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

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

Sincerely,

Jocelyn Drake
Senior Planner

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

# ATTACHMENT 2

# SINA TECHNICAL COMMENTS ON

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

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

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

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

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

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

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

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

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

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

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

CEQA exemption without further environmental evaluation. Refer also to the 2020 CEQA State Guidelines Section 15162[2].

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

a) The Determination did not include evaluation of the wireless facility portion of the project. The wireless facility is not an existing facility and constitutes a modification to the submitted stadium lighting CUA application, which provides only passing mention of the wireless facility and does not describe its impacts.

b) The Determination fails to recognize the lighting project's proposed expanded uses. The transportation review in Step 2 of the CEQA Checklist states: "*The proposed addition of lights at the existing facility would not expand the use of such facility. Instead, the proposed lights would shift the existing use to later times in the day and/or days of the week.*"

c) The Determination fails to recognize the proposed change in use and new construction. The CEQA Determination Checklist Step 4 Item 1 - "Change of use and New Construction" box is not checked although the CUA application checked both of those boxes.

d) The Determination does not include consideration of geology and soils and there is no evidence that a geotechnical report has been completed for the project.

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

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

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

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

[2] https://www.califaep.org/docs/2020_ceqa_book.pdf

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Comment 2.C:** There was plenty of time for Saint Ignatius to select and answer at least some questions during the meeting, but they did not. Therefore, full participation by even English-speaking stakeholders was denied.
Saint Ignatius did not provide a mechanism for participants to officially sign-in to the meeting nor were participants asked to provide the contact information required for a sign-in sheet to be submitted to the Department as part of the Pre-Application Meeting Packet to be filed with the Department. The Pre-Application submittal sign-in form that Saint Ignatius was supposed to use was not used and there was no other way provided to verify who participated in the meeting. The sign-in form also contains a box for people to check to request copies of project plans. Saint Ignatius did not point out that option at the meeting, so neighbors were not informed of their ability to request relevant plans.

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

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

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

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

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[4] https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=7.&chapter=3.5.&lawCode=GOV&title=1.&article=1.

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

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

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

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

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

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

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

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

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

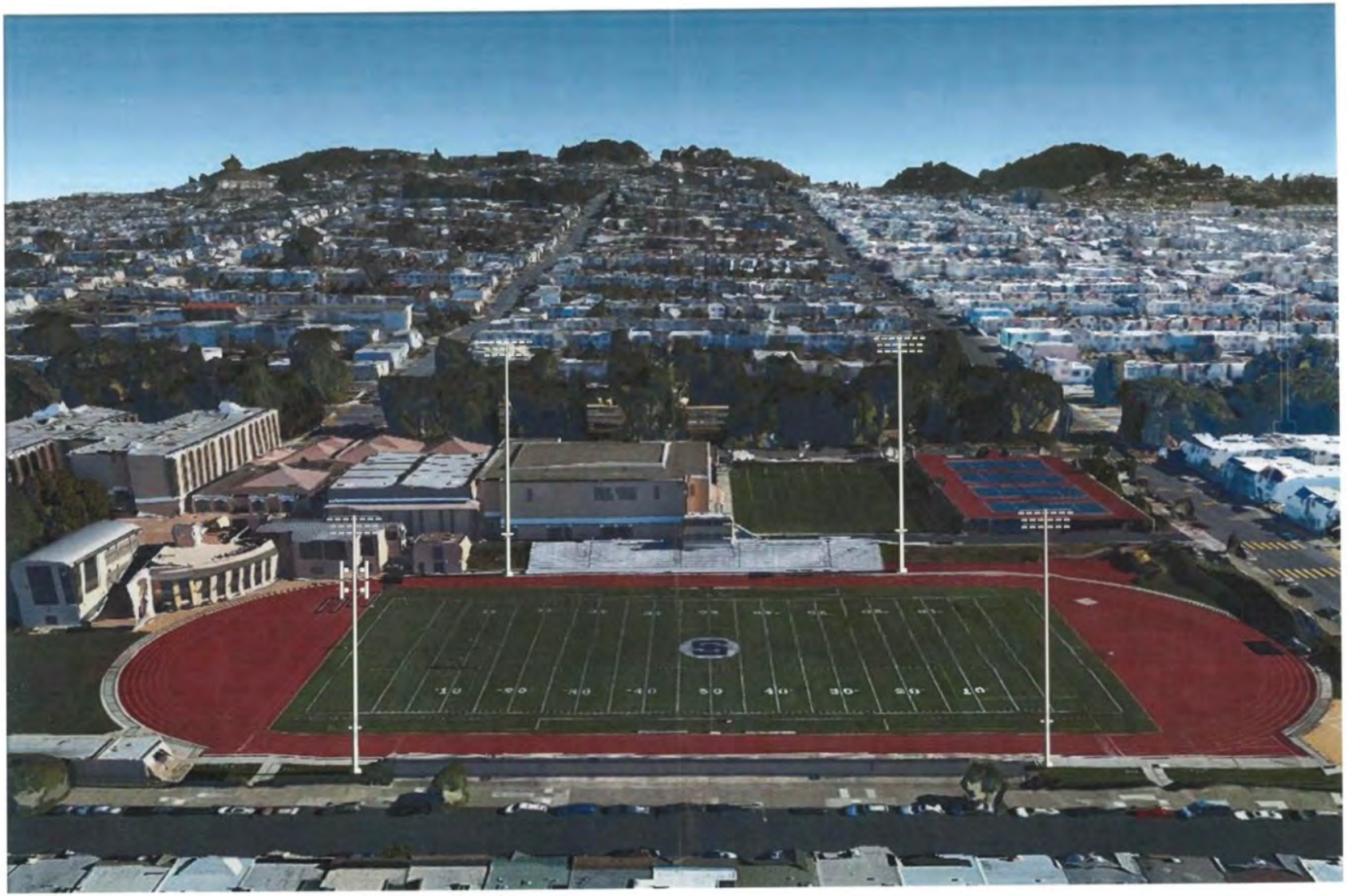
The proposal should be re-filed as a variance application under Code Section 305 rather than as a CUA application. We believe that the project proponent has attempted to circumvent the stricter variance requirements by applying for a CUA rather than a variance. We also believe that a variance should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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

informal meeting with SINA, Mr. Murphy stated the new lights are intended as *"a marketing tool"* to attract top student athletes since the school must compete for top talent[5].

> **Comment 5.A:** The project does not meet the applicable criteria of 303(c)(1). The stadium lighting will only benefit students and the school, which has operated successfully for many years without permanent field lighting. The football field is not available for public use and the proposal will not change that, so the proposed use will not serve the surrounding neighborhoods at all. Instead, it will have significant overflow impacts on the neighborhoods and will degrade the quality of life in them. We believe that very few students live in the Outer Sunset neighborhoods since most students arrive by car or public transit (see also Comment 3.A above).
>
> The project is not necessary or desirable for the immediate neighborhoods especially given the height of the poles and the added intensity of use over many new night time games and practices during weekdays that would result (see additional discussion in Fact and Comment 5.H). The height of the poles is also not compatible with the neighborhood, nor are the poles in keeping with the height or scale of existing development within the surrounding residential neighborhoods (see Fact and Comment 5.E below).

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

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

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

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

[5] SINA contemporaneous meeting notes, March 12, 2020.

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

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

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

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

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

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

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

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

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

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

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

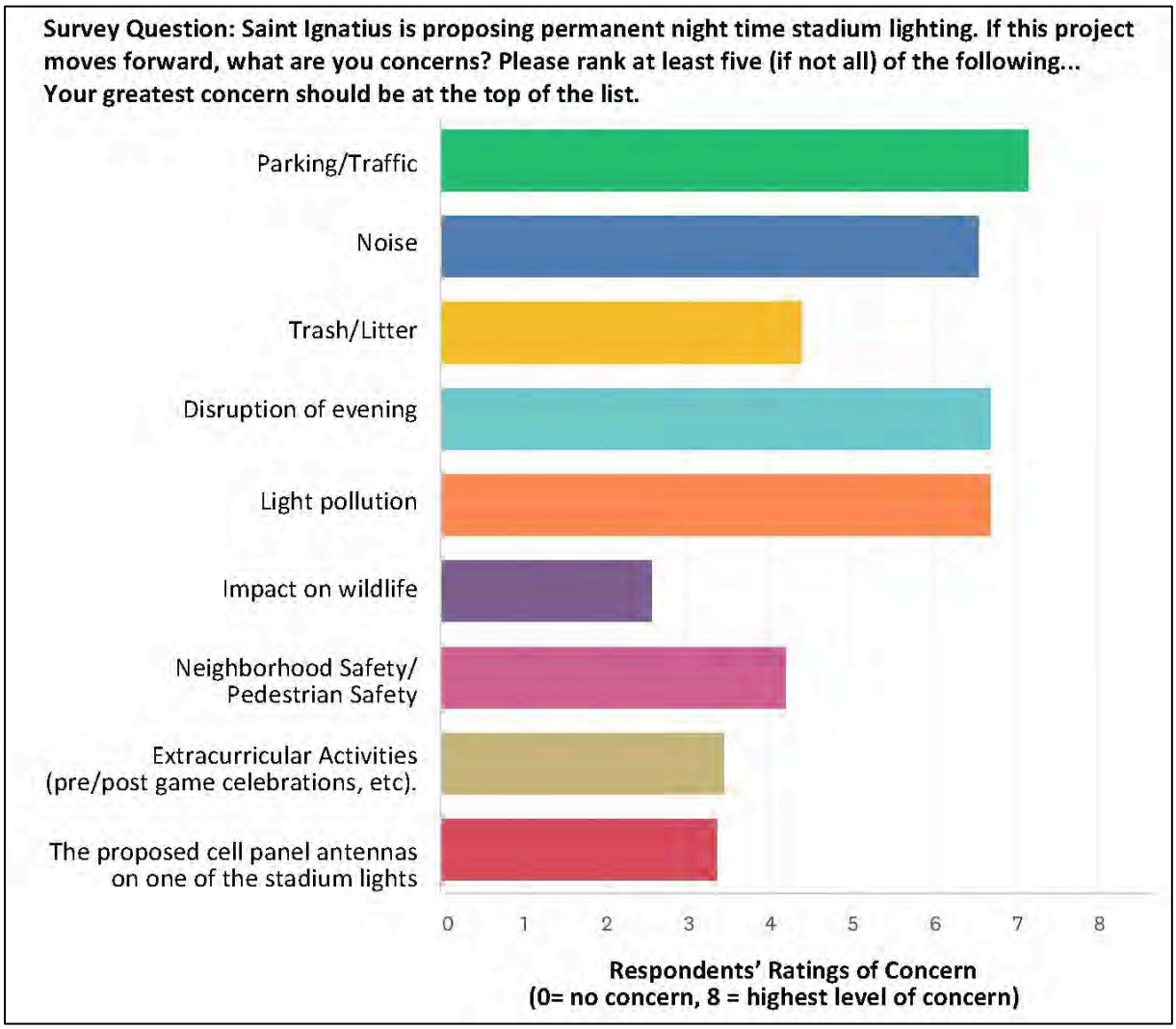
In addition, there are currently no permanent lights on the athletic field, so any new lighting will add significant light pollution load onto the immediate neighborhood and night sky, where there was previously none (see also Facts and Comments 5.E and 5.F, and Topic 6).

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

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

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

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




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

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

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

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

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

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

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[7] Measured estimates from Google Earth.

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

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

[10] https://romesentinel.com/stories/lighting-issues-at-sheveron-stadium,76585

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

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

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

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

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

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

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

are located within 300 feet of a possible urban bird refuge[12] (see 2015-014427PRV) so great care should be taken to ensure that any school lighting does not adversely impact birds.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The 2015 project description document states that Friday night football games would end by 10:00 pm and evening practices and other sporting competitions would end by 8:00 or 8:30 pm. The school provided a table in 2018 of anticipated field use (Figure 3) that shows 66 nights of games with lights on until 10:00 pm, including 12 night time football games that currently occur on Saturday during the day, and 68 other games with lights on until 9;00 pm. At the time, Saint Ignatius also planned to continue renting out their field for 75 additional nights until 10:00 pm although more recently they stated it would not be rented for night use. These games and events are apparently in addition to 150 practice evenings that would have lights on until 8:30 pm (see note ** in Figure 3). Unless temporary lights are used (see Fact and Comment 5.I below) all games have ended at dusk. It can be assumed that all practices currently end at dusk too. This projected usage constitutes potentially a full year of disturbed nights in our neighborhood over potentially seven days of the week as listed in Figure 3.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[18] https://www.usgbc.org/sites/default/files/LEED%20v4%20BDC_07.25.19_current.pdf

**List of Appendices**

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

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

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

**Appendix 4:** 2015 neighborhood meeting materials

**Appendix 4.a:** June 2015 SINA letter to Saint Ignatius
**Appendix 4.b:** September 2015 neighborhood meeting handouts
**Appendix 4.c:** October 2015 Saint Ignatius responses to neighbor questions

# APPENDIX 1

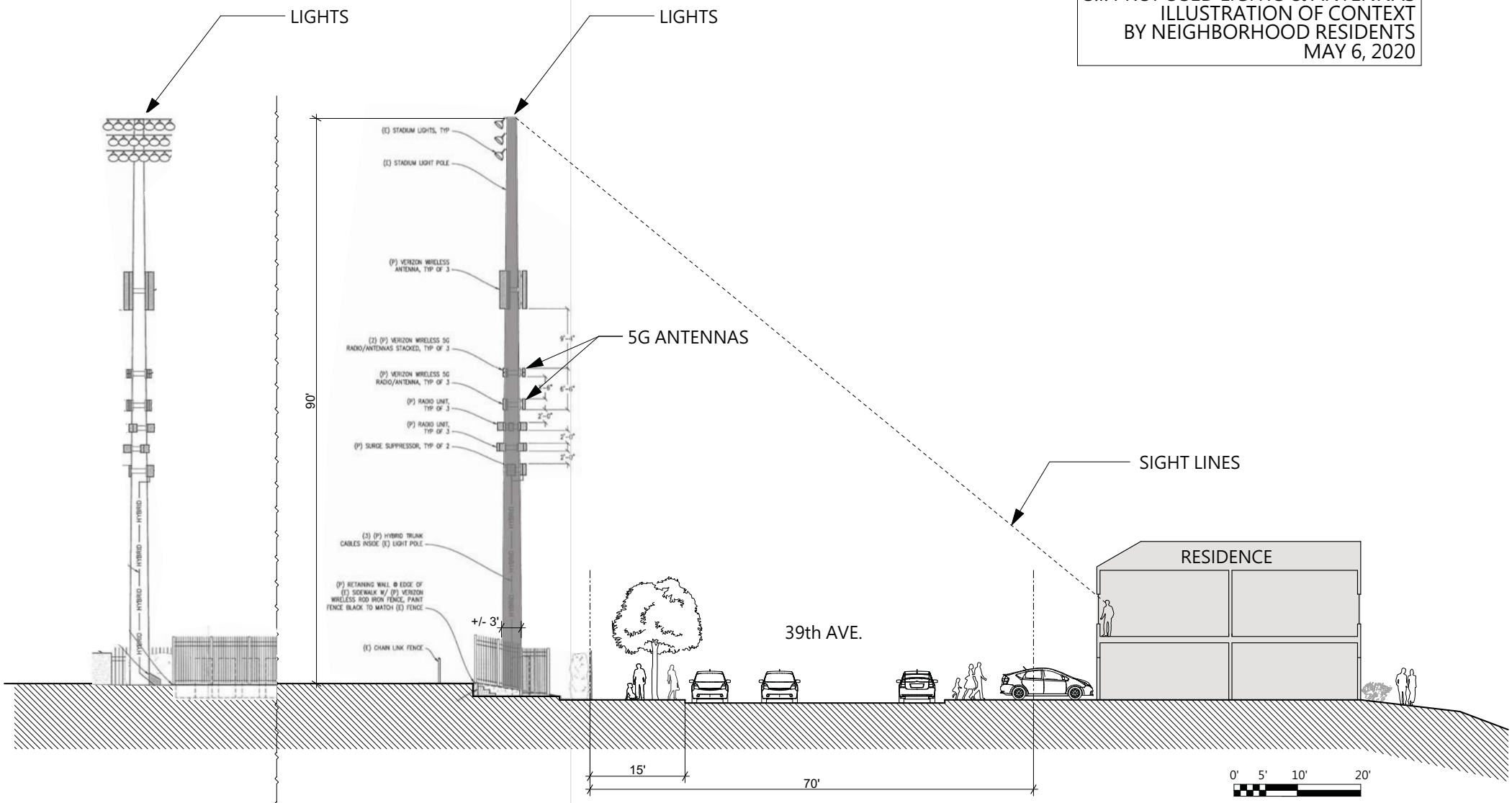
## PHOTOGRAPHIC RENDITIONS AND SCALE DRAWINGS SHOWING RELATIONSHIP OF 90-FOOT POLE HEIGHT TO SURROUNDING BUILDINGS AND LANDSCAPE

Photo Rendition 1
TOP OF LIGHT 90 FT. APPROX 4.5X HEIGHT OF RESIDENCES.
TOP OF LIGHT 90 FEET. OVER 2X HEIGHT OF ADJ. SCHOOL BUILDING.
TOP OF BUILDING APPROX 40 FEET
TREES APPROX 40-50 FEFT
SINGLE FAMILY RESIDENTIAL NEIGHBORHOOD, APPROX 20 FEET
39th Ave
Google Earth
Image Landsat / Copernicus
© 2020 Google
100 ft
N

Photo Rendition 2
TREES APPROX 40-50 FEET
TOP OF BUILDING APPROX 40 FEET
TOP OF LIGHT 90 FEET. OVER 2X HEIGHT OF ADJ. SCHOOL BUILDING.
TOP OF LIGHT 90 FT. APPROX 4.5X HEIGHT OF RESIDENCES.
SINGLE FAMILY RESIDENTIAL NEIGHBORHOOD, APPROX 20 FEET
WIDTH OF FOOTBALL FIELD 160'
Google Earth
Image Landsat / Copernicus
© 2020 Google
Data SIO, NOAA, U.S. Navy, NGA, GEBCO
Data MBARI
N
100 ft

Photo Rendition 3
TOP OF LIGHT APPROX 90 FT. APPROX 4.5X HEIGHT OF RESIDENCES.
SINGLE FAMILY RESIDENTIAL NEIGHBORHOOD, APPROX 20 FEET
TOP OF LIGHT 90 FEET. OVER 2X HEIGHT OF ADJ. SCHOOL BUILDING.
TOP OF BUILDING APPROX 40 FEET
TREES APPROX 40-50 FEET
Google Earth
Data LDEO-Columbia, NSF, NOAA
©2020 Google
Data SIO, NOAA, U.S. Navy, NGA, GEBCO
Data CSUMB SFML, CA OPC
90 ft

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

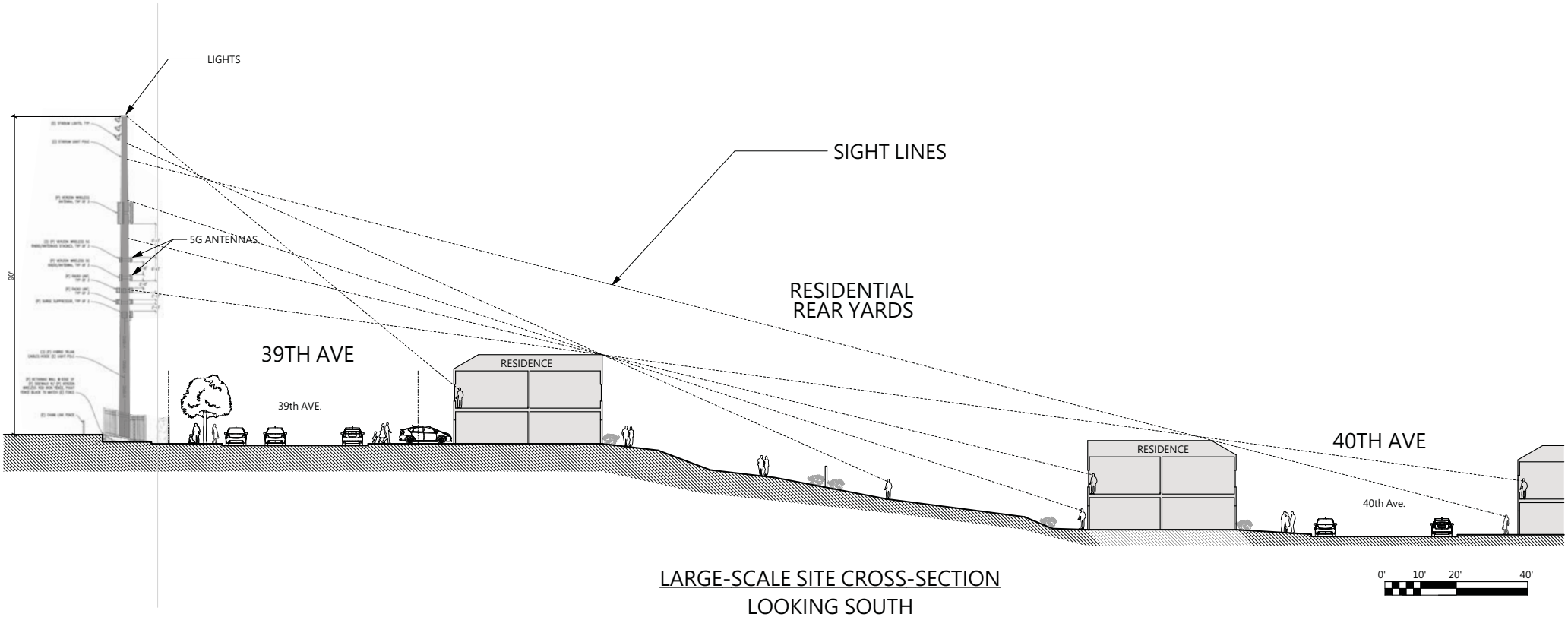



POLE EAST ELEVATION
PER SHEET A-5

SITE CROSS-SECTION AT POLE
PER SHEET A-3
LOOKING SOUTH

# 39TH AVENUE VIEW

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




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

## 39TH & 40TH AVENUE VIEW

# APPENDIX 2

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

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

**Location:** Accessor Block: 2094, Lot No. 006
**Address:** 2001 37th Avenue
**Property Name:** Saint Ignatius College Preparatory

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

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

**Please refer questions and send documents to:**
Deborah Fischer-Brown, Secretary Saint Ignatius Neighborhood Association
415-566-6075
sisunsetneighbors@hotmail.com

**If US mail must be used, please deliver documents to:**
Deborah Fischer-Brown
2151 39th Ave
San Francisco, CA 94116

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

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FYI No Action

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

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

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

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

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

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

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

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

Location: Accessor Block: 2094, Lot No. 006 Address: 2001 37th Avenue.

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

Email: sisunsetneighbors@hotmail.com

If US mail must be used, please deliver documents to:
Deborah Fischer-Brown
Secretary, Saint Ignatius Neighborhood Association
2151 39th Ave
San Francisco, CA 94116

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

Thank you for your prompt attention to this request.

Deborah Fischer-Brown
Secretary, Saint Ignatius Neighborhood Association
415-566-6075
sisunsetneighbors@hotmail.com

# APPENDIX 3

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

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

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

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

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

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

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

Saint Ignatius Questions:

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

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

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

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

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

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

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

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

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

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

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

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

14) In your response to comments at the 2016 neighborhood meeting, you said you would involve an acoustical engineer if 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

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

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

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

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

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

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

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

Thank you
Saint Ignatius Neighborhood

# APPENDIX 4.a

## 2015 NEIGHBORHOOD MEETING MATERIALS

## JUNE 2015 SINA LETTER TO SAINT IGNATIUS

June 29, 2015

Open Letter to SI from your neighbors.

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

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

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

This will reiterate our concerns:

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

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

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

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

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

# APPENDIX 4.b

# 2015 NEIGHBORHOOD MEETING MATERIALS

# SEPTEMBER 2015 NEIGHBORHOOD MEETING HANDOUTS

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

Dear Neighbor,

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

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

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

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

Here's the agenda for the night:

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

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

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

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

Thanks, and we look forward to seeing you.

Rev. Edwin B. Harris, S.J.

Edwin B. Harris SJ

President, St. Ignatius College Preparatory

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

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

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

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

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

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

1. Current state laws do not allow students to carpool until they are 18 years old.
2. SI encourages carpooling and public transportation. We contract with CYO to provide bus transportation from Marin and San Mateo counties for 140 students, and many of our families choose to carpool or ride BART and/or MUNI. Some even use Uber.
3. At this point, we don't plan to build more parking structures, though we do hope to create more parking on 37th avenue between Pacheco and Rivera Streets by making this section one-way and having cars park on a diagonal. This would add 60 additional space (approximately) to the area in front of our school. We have begun discussions with the city to expedite these changes.
4. For evening events or for high capacity events, we can (if available) rent parking at A.P. Giannini School. (We have secured parking there already for the Nov. 7 & 8 fashion shows.)
5. We will continue to encourage the carpooling by using the 511 car-sharing option.
6. We have many students who use car ride services, such as Uber, Lyft and Shuddle.
7. We invite our neighbors to help us think of other solutions. We're curious about the possibility of having street cleaning happen from 3-5 p.m. around the area rather than 9-11 and 1-3 to create more space on the Sunset Blvd. side of 36th Avenue where there is no option to block driveways. We would not pursue this without neighborhood support, and we welcome your ideas to help lessen this problem.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**History**

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

**Rationale**

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

**Advantages to Neighbors**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

From www.cancer.org (the American Cancer Society)

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

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

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

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

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

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

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

# APPENDIX 4.c

# 2015 NEIGHBORHOOD MEETING MATERIALS

# OCTOBER 2015 SAINT IGNATIUS RESPONSES TO NEIGHBOR QUESTIONS

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

1. **The lights will be visible from nearby homes at night, disturbing neighbors and keeping children from sleeping.**
    a. These are state-of-the-art LED lights that light the field efficiently with hardly any illumination beyond the stadium. Take a look at the chart to see just how little light will spill over onto 39th avenue.
    b. The lights will be focused down at the field, not out at the neighborhood
    c. LED lights have less impact on birds and other wildlife than older generation lights.
    d. We have engaged a lighting engineer recommended by the City of San Francisco to perform a light study, the same engineer who did the work at the Beach Chalet soccer fields. We will share the lighting study with all interested parties.

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

3. **Lights on the field means that SI will rent the field out to groups who will also bring traffic, noise & light pollution to the neighborhood after regular school hours.**
    a. We have significantly cut back rentals. We will not rent our facility for night use.

4. **The height of the towers will obstruct views and be unsightly.**
    a. 90 feet is the optimal height to adequately light the field while providing almost no spillover of light onto surrounding houses. Please look at the light spillover schematic at the lighting table. The light poles can be shorter but this will likely lead to greater light spillover. Note that the lights at South Sunset and Beach Chalet are 70 feet tall.
    b. Only one light pole needs to have cellular equipment mounted to it; however, at a future date, we may add cellular equipment to a second pole.
    c. The antennas atop our light poles are less obtrusive than the antennas mounted on existing telephone poles.

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

6. **Some neighbors wonder why the school needs the lights at all, given the long history of the school functioning without the lights.**
    a. Students can use JB Murphy Field only on daylight hours; this impacts the rest of their day and defines just when they can practice and play, especially in the winter months when the sun sets earlier than the rest of the year. The same is not true anywhere else on campus (with the exception of the tennis courts). Students can practice and perform dance, drama, orchestra and choir well into the evening, freeing up their time after school for collaborative work on class projects and other co-curricular activities. The primary mission of the school is the education of our students and lights will permit us to have fewer early dismissals in which students miss class time.
    b. It is important, too, to keep as many of the students at the main campus as possible. This is true for theatre, music and sports. While we have alternative fields, the goal is to utilize this campus as a headquarters, with academics followed by afterschool co-curriculars, including athletics and performing arts. Having students on campus aligns with our priorities.

| | |
|---|---|
| **From:** | SISunsetNeighbors @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<br>BOS File #200992 and #200996 - SINA Commission Submittal 1 - 2020_05_06.pdf<br>BOS File #200992 and #200996 - SINA Commission Submittal 2 - 2020_06_09.pdf |

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

**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
Mr. Jeff Horn, Senior Planner, Current Planning jeffrey.horn@sfgov.org

cc: Planning Commissioners:
Mr. Joel Koppel, President joel.koppel@sfgov.org
Ms. Kathrin Moore, Vice-President kathrin.moore@sfgov.org
Ms. Sue Diamond sue.diamond@sfgov.org
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Ms. Milicent Johnson milicent.johnson@sfgov.org

**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
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/1Z1eyXDgRwAplPKLKnXlEVh-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]*" [1]. 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)[2] which required the Novato School District to prepare a revised draft EIR that includes an appropriate baseline, evaluates aesthetics, analyzes the

[1] https://caselaw.findlaw.com/ca-court-of-appeal/1629130.html
[2] Publicly available at http://lawzilla.com/blog/coalition-to-save-san-marin-v-novato-unified-school-district/

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.[3] 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.[4]

d) Clayton Valley High School prepared an EIR and later a supplemental EIR for their stadium lighting project.[5] 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[6] 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[7] 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; <u>therefore, the only benefit is to the school</u>.
2. The combined effects of the project on light and glare, noise, and traffic congestion would <u>adversely affect the character of the surrounding community</u>.

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[3] https://caselaw.findlaw.com/ca-court-of-appeal/1629130.html
[4] https://www.mpusd.net/apps/pages/index.jsp?uREC_ID=1424772&type=d&pREC_ID=1788897
[5] https://yvhslightingproject.files.wordpress.com/2012/06/environmental-impact-report-clayton-valley-hs1.pdf
[6] https://yvhslightingproject.files.wordpress.com/2012/06/northgate-high-school-final-eir.pdf
[7] https://www.lgsuhsd.org/UserFiles/Servers/Server_87205/File/District%20Information/General%20Obligation%20Bond,%202014/073.pdf

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:

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.[8] 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).

[8] https://www.siprep.org/uploaded/Neighbor_Postcard_one_side.pdf

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

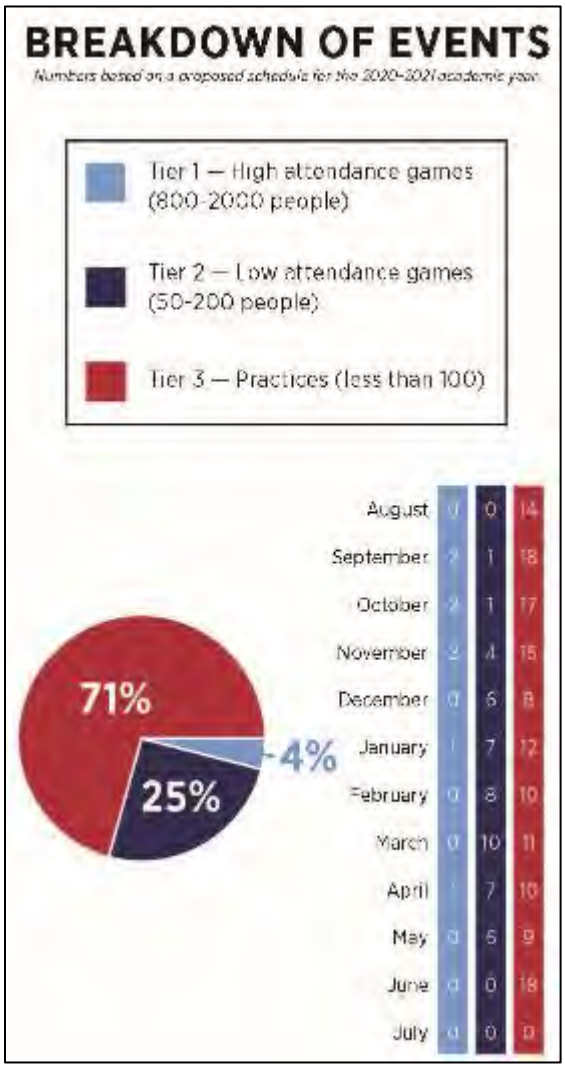


**Figure 1.b: SINA Calculations of Use**

SINA has calculated that the schedule totals 200 games and practices per year, with monthly totals as follows:

| Month | Total Evenings | % of Total Days in Month |
|---|---|---|
| Aug | 14 | 45% |
| Sep | 21 | 70% |
| Oct | 20 | 65% |
| Nov | 21 | 70% |
| Dec | 14 | 45% |
| Jan | 20 | 65% |
| Feb | 18 | 64% |
| Mar | 21 | 68% |
| Apr | 18 | 60% |
| May | 15 | 50% |
| Jun | 18 | 60% |
| Jul | 0 | 0% |

Via a public records request, SINA obtained a 1990 traffic study[9] 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

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

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[10], 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 39th 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 37th, 38th and 40th Avenues. Note that Figure 3 shows only a single open parking space on 39th 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.

[10] https://www.siprep.org/uploaded/NIGHT_EVENT_MGMNT_PLAN_2020.pdf

**Figure 2: Verizon Photo Rendition View 1.**

verizon

Sunset & Noriega Site # 255926

Looking Southeast from 39th Ave.

2001 37th Ave.
San Francisco, CA

2/6/20

View #1

Insight photosim (707) 315-1585

**Figure 3: Verizon Photo Rendition View 2.**

verizon

Sunset & Noriega Site # 255926

Looking Northeast from 39th Ave.

2001 37th Ave.
San Francisco, CA

View #2

2/6/20

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:

- 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.
- 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.[11]

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 39th Avenue and Rivera Street, in the middle of the street on 39th Avenue, and at some homes on 39th Avenue.

More important, however, are estimates of candela[12]. 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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[11] http://library.amlegal.com/nxt/gateway.dll/California/police/policecode?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$sync=1

[12] Candela is a measure of the intensity of a light source in a particular direction.

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 39th 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.[13] Readings above 1,500 candela also exceed Musco's own "*minimal to no glare*" category and occur at 22 of 24 homes on 39th 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."[14] 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."[15]

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[16]. Reflected glare should be considered in predictions of overall glare levels[17] 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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[13] (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/WP528003EN-Ephesus-University-of-Phoenix-Glare-Analysis.pdf
[14] https://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=1038&context=archengdiss
[15] https://www.darksky.org/the-promise-and-challenges-of-led-lighting-a-practical-guide/
[16] IESNA Recommended Practice for Sports and Recreation Lighting (RP-6-1)
[17] International Commission on Illumination "Technical Report: Guide on the Effects of Obtrusive Light From Outdoor Lighting Installations" (2003)

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).

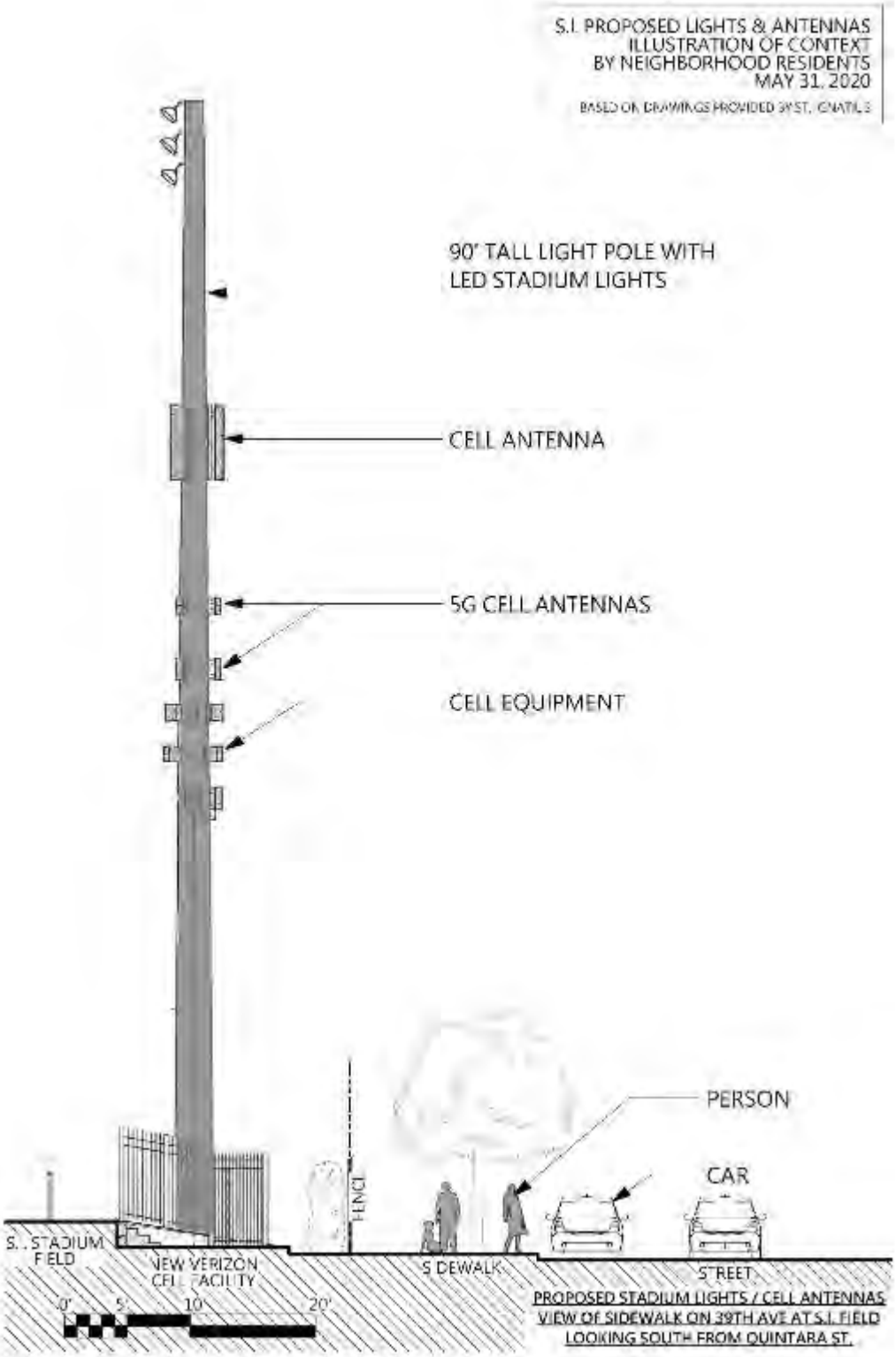
d) **Aesthetics:** The CEQA determination is incomplete since it does not include an evaluation of aesthetic impacts. The current CEQA determination still maintains that no further environmental review is required, the project is categorically exempt, and "*There are no unusual circumstances that would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

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



## 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[18] 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

[18] https://commissions.sfplanning.org/cpcpackets/2018-012648CUA.pdf

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.[19] 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 <u>will not approve</u> 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 <u>on buildings that already have wireless installations,</u> 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 39th 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 <u>within 11 feet of the sidewalk</u> on 39th Avenue, and within less than 100 feet of the homes on 39th 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

[19] https://archives.sfplanning.org/documents/8709-Wireless%20Telecommunications%20Services%20WTS.pdf

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,

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

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.

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.[20] 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 29th 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 30th 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

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

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).

<u>SINA Question /Concern #14:</u> 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.

<u>SINA Question /Concern #15:</u> 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

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 40th 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."*

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 39th 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 <u>not</u> 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 irrevokably disrupted, significantly affecting the livability of the neighborhood in adverse ways.

## 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

Court of Appeal, First Appellate District
Charles D. Johnson, Clerk/Executive Officer
Electronically FILED on 4/23/2020 by G. King, Deputy Clerk

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,<br>Plaintiff and Respondent,<br>v.<br>NOVATO UNIFIED SCHOOL DISTRICT,<br>Defendant and Appellant. | A156877<br><br>(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)[1] for a project known as the San Marin

[1] "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,[2] § 21168). We affirm.

## FACTUAL AND PROCEDURAL BACKGROUND[3]

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.

[2] 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*).)

[3] 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[4]

### 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)[5], glare intensity[6], and sky glow[7].

#### 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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[4] The description is taken, in part, from quoted portions of the trial court's decision, omitting citations to the administrative record.

[5] "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.' "

[6] "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 adopted.' Glare intensity ranges from the wors[t] case – 'disability glare' where visibility is lost, to 'discomfort glare' where the light is distracting and uncomfortable."

[7] "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 'sparely-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 with 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.

Petrou, J.

WE CONCUR:

Siggins, P.J.

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

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

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 staduim 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?

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25. Name: Susan Lin on 2020-05-28 02:35:23
Comments:

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26. Name: Randall Hung on 2020-05-28 02:38:33
Comments:

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27. Name: Alan OBrien on 2020-05-28 02:41:06
Comments:

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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.

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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!

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30. Name: Adelle-Akiko Kearns on 2020-05-28 03:50:27
Comments:

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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 crouds 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.

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!

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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.

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73. Name: Lori Ziemba on 2020-06-02 19:12:52
Comments: NO 5G, NO lights!

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74. Name: Donald Ciccone on 2020-06-02 19:32:42
Comments:

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75. Name: Tina zhu on 2020-06-02 20:14:43
Comments:

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76. Name: Tracy Ashton on 2020-06-02 21:19:07
Comments:

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77. Name: Kelsey Koch on 2020-06-02 22:19:17
Comments:

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78. Name: Susan rivadeneyra on 2020-06-02 23:05:05
Comments:

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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.

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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.

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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 I intrusive to the neighborhood. Also, neighbors should be allowed use of the field. Parking on the surrounding streets will be impacted I to evening hours,as well.

No thank you

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 woulds 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

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:

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103. Name: Philip Hung on 2020-06-03 18:13:29
Comments:

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104. Name: Damian A Nunez on 2020-06-03 19:08:38
Comments: No Lights Please!!! Share....

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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.

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106. Name: Natalie Tam on 2020-06-03 19:42:32
Comments: We should respect the neighbors

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107. Name: Duncan Lee on 2020-06-03 19:45:24
Comments:

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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 quailty of life. Please deny the permit or, at a minium, order SI to publish a sufficiently detailed plan so we can ensure mitigation of the detrimental impact on our quiet residential neighborhood.

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109. Name: Jerry Woo on 2020-06-03 20:37:35
Comments: No stadium lights in residential area.

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110. Name: Harry on 2020-06-03 20:42:31
Comments:

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111. Name: Marykathleen stock on 2020-06-03 20:45:13
Comments:

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112. Name: Patrick Schlemmer on 2020-06-03 21:10:44
Comments: I do not want these bright lights in my neighborhood.

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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 theose 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:

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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.

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145. Name: Millie Fish on 2020-06-04 16:59:20
Comments:

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146. Name: Nicole on 2020-06-04 17:12:14
Comments:

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147. Name: Benja kew on 2020-06-04 17:44:28
Comments:

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148. Name: Lauraine Edir on 2020-06-04 18:05:32
Comments:

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149. Name: Ellen Scanlan on 2020-06-04 18:16:21
Comments: Light pollution is a global problem.

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150. Name: Dianne Alvarado on 2020-06-04 18:26:22
Comments:

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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?

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152. Name: Albert Ma on 2020-06-04 20:29:10
Comments:

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153. Name: Garlen Chan on 2020-06-04 20:33:59
Comments:

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154. Name: Agnes V on 2020-06-04 20:40:17
Comments:

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155. Name: Vincent T on 2020-06-04 20:40:59
Comments:

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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.

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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!!!

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170. Name: Erin Aulner on 2020-06-05 07:28:09
Comments:

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171. Name: Erin Armstrong on 2020-06-05 07:37:27
Comments:

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172. Name: Rosalie Friedman on 2020-06-05 17:16:43
Comments:

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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.

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174. Name: Jack Allen on 2020-06-05 23:43:16
Comments: No lights at SI please

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175. Name: Michael Ma on 2020-06-06 00:41:47
Comments:

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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.

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177. Name: Michele Gachowski on 2020-06-06 05:47:21
Comments:

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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

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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 noice, more cars, more violence. Our children are able to walk to the park safely ow and that will be imposible with this project.

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181. Name: Michelle Tam on 2020-06-06 21:21:18
Comments:

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182. Name: Elaine Mina on 2020-06-06 23:37:37
Comments:

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183. Name: Yvonne Daubin on 2020-06-06 23:55:35
Comments: I strongly oppose this.

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184. Name: Sadaf Mir on 2020-06-06 23:57:31
Comments:

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185. Name: Andrew Sohn on 2020-06-07 02:01:48
Comments:

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186. Name: Michael Murphy on 2020-06-07 02:44:13
Comments: This project is of no benefit to the community.

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187. Name: Crystal Stermer on 2020-06-07 05:13:15
Comments:

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188. Name: Michael Bourne on 2020-06-07 05:18:16
Comments: No lights! No cell tower!

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189. Name: Kelly Le on 2020-06-07 05:28:02
Comments:

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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 surounding 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**

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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 though 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. femoticell
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 be 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 afflicated

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 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 37th 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 we 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 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
**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
**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 tpically 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
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

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# 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 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.

Photo: Paul Kozakiewicz

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

"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."

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|---|---|
| **From:** | SISunsetNeighbors @hotmail.com |
| **To:** | BOS Legislation, (BOS); Board.of.Supevisors@sf.org |
| **Cc:** | Mar, Gordon (BOS) |
| **Subject:** | Email 5 of 5: BOS File #200992 and #200996, CEQA and CUA Appeal Supplement – Saint Ignatius Stadium Lighting (Planning #2018-021648CUA) |
| **Date:** | Thursday, September 17, 2020 11:39:00 AM |
| **Attachments:** | Outlook-dnvmirkc.png<br>BOS File #200992 and #200996 - SINA Commission Submittal 3 - 2020_07_22.pdf |

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

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

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Attached please find the final document we are submitting today that supplements the CEQA and CUA appeals filed under BOS File #200992 and #200996 for the Saint Ignatius Stadium Lighting Project.
This document was originally submitted to the Planning Commission in advance of the 7/23/20 Commission hearing on the project.
We would like to put this in the Board of Supervisors records for our appeals.

Kindly confirm receipt of all 5 emails submitted today, 9/17/20.
Thank you

Deborah Brown, Secretary

SI Neighborhood Association

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July 22, 2020

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

cc: Planning Commissioners:
Mr. Joel Koppel, President joel.koppel@sfgov.org
Ms. Kathrin Moore, Vice-President kathrin.moore@sfgov.org
Ms. Deland Chan deland.chan@sfgov.org
Ms. Sue Diamond sue.diamond@sfgov.org
Mr. Frank Fung frank.fung@sfgov.org
Ms. Theresa Imperial theresa.imperial@sfgov.org
Ms. Milicent Johnson milicent.johnson@sfgov.org

**RE: 2nd Supplement to SINA Advance Submissions dated May 6, 2020 and June 9, 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 2nd supplement to our prior Advance Submission Documents filed May 6, 2020 and June 9, 2020 concerning the proposal to install stadium lighting at the Saint Ignatius athletic field as a Conditional Use (Planning Case No. 2018012648CUA).

Both prior comment sets are included in the current hearing packet for the July 23, 2020 hearing and available at: https://drive.google.com/file/d/1Z1eyXDgRwAplPKLKnXlEVh-cXC1TyhY_/view?usp=sharing, and https://drive.google.com/file/d/1SoVI9OkGWPhj8N5Pl8Imye7aLTuvcK4w/view.

This additional supplement is necessary because new information has become available since our two prior submittals. The two continuances of the project hearing (originally scheduled for May 14 and rescheduled to June 11, 2020) has also given us the time to review project documents in more detail and engage additional experts for their input.

Sincerely,

*Deborah Brown*

Deborah Brown, Association Secretary
Saint Ignatius Neighborhood Association
sisunsetneighbors@hotmail.com

Attachment: July 22, 2020 SINA Supplement to SINA Advance Submissions

**2nd Supplement to SINA Advance Material Submittal**
**for the Saint Ignatius Stadium Lighting Proposal,**
**CUA application #2018-012648CUA**

The comments below supplement the May 6, 2020 and June 9, 2020 Saint Ignatius Neighborhood Association (SINA) Advance Materials Submittals to the San Francisco Planning Commission for the Saint Ignatius College Preparatory High School's Stadium Lighting Project (#2018-012648CUA). SINA filed the first set of comments in advance of the previously scheduled May 14, 2020 Commission hearing and the second set in advance of the previously scheduled June 11, 2020 hearing. Both comment sets are included in the current hearing packet for the July 23, 2020 hearing and are available here as well: https://drive.google.com/file/d/1Z1eyXDgRwAplPKLKnXlEVh-cXC1TyhY_/view?usp=sharing, and https://drive.google.com/file/d/1SoVI9OkGWPhj8N5Pl8Imye7aLTuvcK4w/view.

This submittal summarizes additional information that has come to light since our June 9, 2020 submittal, discusses how the proposed project is inconsistent with the San Francisco General Plan, and reiterates SINA's continued key concerns about the project's adverse impacts.

## A. New information

### 1. Saint Ignatius - SINA meeting July 7, 2020

School representatives held a July 7, 2020 Zoom meeting with four SINA representatives as a means to engage with the neighbor community, apparently at the request of the Planning Department. During that meeting, school representatives made the following statements that continue to concern SINA about the lighting project:

a) When asked if they would consider having another neighborhood-wide remote meeting – this time without muting the neighbors and in the interest of true dialog – the school replied that this four-person neighbor meeting would be the extent of engagement, stating: "All the pre-planning is done for the July 23 Commission hearing. The Planning Department asked us to have this meeting."

b) They confirmed that night use of the athletic field would occur virtually every weeknight during the school year (August 15 – May 31) or up to 200 nights per year, and for 20 large games on Friday or Saturday nights. This is double the number of nights stated in their revised project description (see hearing packet pdf p. 104). Currently, night use of the field has ended at dark or was extended under limited use of temporary lighting only for large games. Projected attendance would be up to 1,000 people on Mondays – Thursdays, and up to 2,800 people on Friday and Saturday night games. We remain extremely concerned about the adverse impacts on traffic, parking, noise, trash, and other noxious emissions and behaviors that this new level and intensity of activity would bring to the neighborhood virtually every night throughout the school year.

c) They stated that their request to modify the practice field lighting CUA (Record #2003.1273C) from the currently authorized 7:30 pm to 9 pm on weeknights, 10 pm on Fridays, and 8 pm on weekends is no longer a part of the current CUA application. However, they indicated that they may request that modification again in

the future. The request is still described in the project proposal of the draft Commission CUA motion (see project hearing packet pdf pages 96, 98, and 101) and should be removed from the current stadium lighting proposal so that the Commission does not inadvertently approve that modification without sufficient review.

d) The school did not address noise in their proposed CUA draft motion Exhibit A Condition #11 language saying that they "probably did not consider noise". This is troubling since the CEQA Impacts section of the draft motion (see hearing package pdf p. 71) contends (without any scientific or technical basis) that the project would not result in a substantial increase in ambient noise levels. Given that field noise would now occur at least 200 nights per year, there will undoubtedly be increased noise levels. Without a noise study there is no way to determine whether the increase would be substantial or not. SINA requested such a study in our May 6 and June 9, 2020 comments.

e) At SINA's request, the school provided dimensions of the lighting arrays at the top of the 90-foot poles. According to the plan drawings provided, the arrays would occupy a space over 17 feet long, nearly 5 feet tall and nearly 4 feet deep. This bulk is approximately equivalent to the size of some 10-yard trash dumpsters[1] or three typical 4-yard trash dumpsters lined up end to end[2]. This bulk at the top of each pole would create a permanent blight on the landscape, especially during daytime and visible from the entire surrounding area.

f) The school representatives were unaware that they had not responded to neighbor questions submitted to the ASK SI webpage[3] over the last several months and said they would review those submittals and respond to them. To date, we are unaware that they have done so.

g) The school representatives agreed to obtain information from Musco on the effects of fog on lighting levels and reflection. To date, SINA has not received that information.

## 2. Musco Photometrics Study

The repeated Commission hearing continuances have allowed SINA to conduct a more in-depth review of the revised Musco photometrics documents with the assistance of a highly qualified, award-winning lighting design consultant and architect (see lighting report in Appendix A).

The report author concluded that the proposed stadium lighting installation would have a severe and negative impact on the neighborhood, and in particular, the residences located directly across the street from the school athletic field on 39th Avenue. Due to the quantity, height and most importantly, the use schedule of the lights, they would create a significant problem for the health and wellbeing of the neighbors and neighborhood. While intermittent

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[1] https://www.republicservices.com/dumpster-rental?tab=residential
[2] https://wasteindustries.com/commercial/dumpster/rentalservices
[3] https://docs.google.com/forms/d/e/1FAIpQLSd5bSWGLQ_px_pDpDe1CMdTMDgZiQakm20cqbFShIWTew_Zqw/viewform

use of the lighting (e.g. one night game a week in the fall, as is currently done with temporary lights) is generally tolerable, the use of the lights for up to 200 nights of the year (55% of the entire year and virtually every weeknight during the school year) for hours at a time, ostensibly when the nights are the longest (fall and winter), will fundamentally change the nature of the neighborhood and eliminate the darkness currently present there. Furthermore, the presence of such high light levels during hours of natural darkness will not only create problems with light pollution and glare, but has the potential to disrupt circadian cycles, particularly for the residents immediately opposite the athletic field.

The lighting consultant's report goes into detail about the fundamental issues related to the proposed lights and problems with Musco's photometrics study, including:

a) Light levels at the 39th Avenue home façades are 2-3 times higher than recommended by the Illuminating Engineering Society (IES) for those residential areas.

b) Light levels at the school's property line are 6 to 7 times higher than even a "high" pedestrian light level of 1 foot candle.

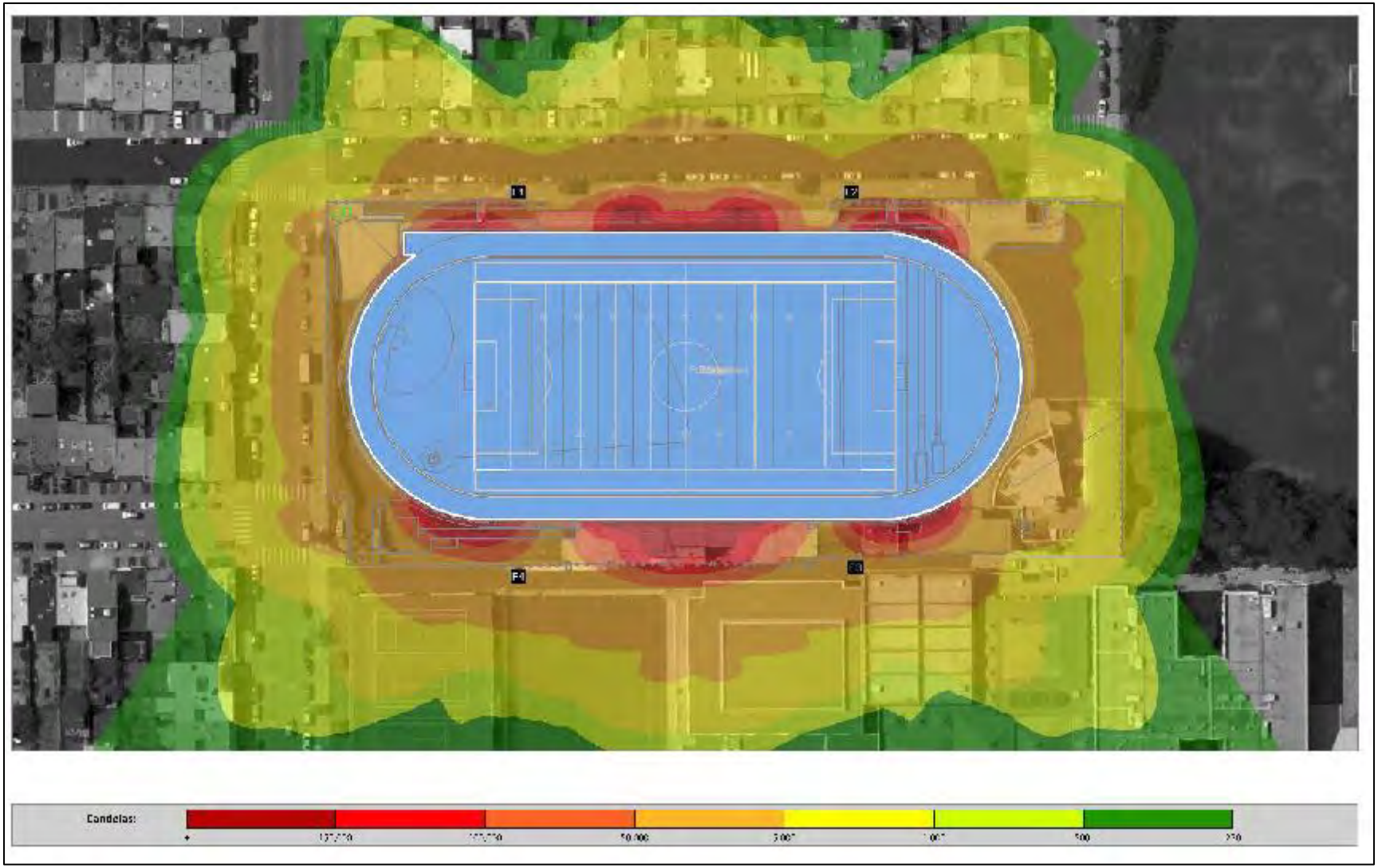
c) Misleading vertical illuminance levels measured at 3 feet off the ground significantly under-represent what the light levels would be at the 2nd floor windows of the homes (homes in the neighborhood have garages and entries on the first floor and living areas on the 2nd floor). Light trespass into windows would be 26 times higher than LEED guidelines of 0.1 foot candle.

d) The Musco photometrics do not show measurements of luminance, roughly a measure of "brightness". The addition of 50 foot candles of light onto and across the athletic field will turn the field into a bright, light-reflecting surface, and will do the same to other surfaces nearby (sidewalks, bleachers, out-building walls, etc.).

The report confirms SINA's comments submitted previously (June 9, 2020 submittal Comment 1.2) and supplemented in Sections A.3 and A.4 below, including:

a) Musco's glare map (Figure 1 below) shows the façades of the houses along 39th Avenue to be mostly in the yellow band, indicating a range of 1,000 to 5,000 candela. By Musco's own map legend, this is not negligible in terms of the amount of glare (which they indicate as <= 500 candela shown in dark green). Candela levels outside of the school's property line on the 39th Avenue sidewalk and street are even higher, shown in the range of 5,000 to 50,000 candela. Musco defines "significant glare" as starting at 25,000 candela and being equivalent to a car's high beam headlights. Since Musco has not provided the IES data files for their luminaires, it is not possible to do a separate analysis of the installation, particularly the characteristics of the luminaires as they relate to glare, backlight and uplight.

**Figure 1. Musco Glare Map**



b) Typically, sports lighting is not well shielded in any direction and contributes greatly to light pollution as the luminaires are angled. In order to verify any claims of shielding, Musco needs to provide the IES files and a detailed luminaire photometric report.

c) Fog increases the amount of light pollution because it disperses light through the water molecules suspended in air and serves as an outdoor "ceiling" which the light bounces off of and reflects back down to the ground.

d) The significant increase in the quantity and duration of blue-enriched light during dark hours has the potential to have significant impacts on circadian rhythm-related health, especially in children who are much more vulnerable to such disruptions. Animals and plants are also susceptible to disruptions in behavior, growth, and reproduction from excess blue-white light.

## 3. Adverse Human Health Effects

a) SINA's May 6, 2020 comments (Fact 5.F and associated comments) discussed some of the adverse health effects of the proposed LED lighting, and the American Medical Association's concerns for and guidelines over use of such lights.

b) The New York Times published an article on July 13, 2020[4] summarizing the results of a recent study that found that the more intense the lighting in teenagers' neighborhoods, the poorer their sleep and the greater their risk for depression and anxiety. The NY Times article quoted the senior author as saying: "At least as individuals, we ought to try to minimize exposure to light at night." SINA obtained and reviewed the report published in JAMA Psychiatry[5]. We are concerned about the study's findings not only for our neighborhood children but also for the student athletes who would have direct exposure to the high intensity lighting on the athletic field for several hours at a time most nights of the week. In addition to games, the school's three football teams and six soccer teams practice six days a week. The four lacrosse teams and four track and field teams practice five day a week. This continual high level of exposure should be of grave concern to parents and school administrators who claim that the school needs to start later in the day for student health reasons and that the lights are needed to provide sufficient time for games and practices after a later-ending school day. This perspective is incompatible with the scientific evidence on the harm to adolescents from over exposure to high-intensity light.

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[4] https://www.nytimes.com/2020/07/13/well/mind/bright-outdoor-lights-tied-to-less-sleep-more-anxiety-in-teenagers.html?action=click&module=Top%20Stories&pgtype=Homepage&contentCollection=AtHome&package_index=0

[5] https://jamanetwork.com/journals/jamapsychiatry/article-abstract/2767698?utm_campaign=articlePDF&utm_medium=articlePDFlink&utm_source=articlePDF&utm_content=jamapsychiatry.2020.1935

## 4. Adverse Biological Effects

a) The Musco photometrics study indicates that the total illumination for all pole-mounted lighting would exceed to 6.3 million lumens over the 2.5-acre athletic field. This amount of additional concentrated lighting is several orders of magnitude higher than the ambient nighttime lighting levels in the immediate neighborhood which is limited to street lighting and some minimal home and building façade lighting (see Figure 2 below). The amount of reflected light from the athletic field has not been determined by Musco but, as noted above it is likely to be significant, and exacerbated by the regularly occurring fog in the area.

b) In addition to the adverse human health effects, these lights would have significant adverse biological effects on wildlife. Extensive peer-reviewed literature is available [6, 7, 8, 9] that documents these effects, including disruption of the nocturnal environment, attraction of sea birds and migratory birds to bright lights, alterations in amphibian, reptile, insect and pollinator behavior, reproductive changes in many species, and reduction in foraging and roosting behavior of bats.

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[6] For instance, the Journal of Experimental Zoology Part A devoted an entire issue to Artificial Light at Night as an Environmental Pollutant. Volume 329 Issue 8-9, October/November 1, 2018. https://onlinelibrary.wiley.com/toc/24715646/2018/329/8-9

[7] https://www.researchgate.net/publication/272889669_Impacts_of_artificial_lighting_on_bats_A_review_of_challenges_and_solutions

[8] https://www.researchgate.net/profile/Michael_Salmon3/publication/235602286_Perry_G_B_W_Buchanan_R_Fisher_M_Salmon_and_S_Wise_2008_Effects_of_night_lighting_on_urban_reptiles_and_amphibians_Chapter_16_in_Urban_Herpetology_Ecology_Conservation_and_Management_of_Amphibians_and_/links/57486e6108aeae389f4e1792.pdf

[9] https://www.nature.com/articles/s41598-018-21577-6

**Figure 2. Musco Nighttime Photo Rendition**

c) The US Fish and Wildlife Service's online IPaC mapping system[10] provides information on the known or expected ranges of threatened and endangered species protected under the federal Endangered Species Act as well as migratory birds protected under the federal Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act. An online data check was conducted on July 20, 2020 and lists the species that could be affected by activities in the 98-acre area bounded by Ortega and Santiago Streets, and 36th and 41st Avenues, including the school (see Appendix B). Some of the species are also state-listed threatened or endangered species. In addition, over 67 more common bird species have been observed since 2015 at the West Sunset Playground, as reported on the eBird website[11] (see Appendix C). There are also 16 bat species within the Bay area[12] and at least four in the City[13] that would also be adversely affected by the stadium lighting. Lastly, as noted in SINA's May 6, 2020 comments the area along Sunset Boulevard is an urban bird refuge[14].

d) It is not the role of SINA to investigate the potential adverse effects on these sensitive species. However, it is highly likely that the new high-intensity lighting would adversely impact at least some of them. A CEQA review would typically trigger consultation with the US Fish and Wildlife Service and California Department of Fish and Wildlife; however, the lighting project has been determined to be CEQA exempt, so this review has not occurred.

e) We firmly believe that CEQA review is warranted as discussed in our May 6 and June 9, 2020 comments. But, irrespective of CEQA applicability, the school is responsible for conducting sufficient due diligence to first identify and then to mitigate adverse effects of the proposed lighting on sensitive species in accordance with state and federal law. The Planning Department must also support the City's Biodiversity Program and the Department's own Biodiversity Policy by providing robust oversight on projects that could imperil biodiversity. The Department's policy states: "*In San Francisco, 95% of our land area is developed and its remaining natural heritage, including a dozen distinct ecological communities and several endangered species, is in a precarious state. From the Pacific Ocean to the Bay, the City is a unique natural environment worth protecting. The Planning Department has an important role (in-dependently and in collaboration with our fellow City agencies) to help San Francisco be a sustainable and healthy city for all its inhabitants; human, animal, and plant*." The presence of sensitive species must be investigated and potential adverse impacts of the stadium lighting project on them must be evaluated and mitigated to the extent possible.

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[10] https://ecos.fws.gov/ipac/
[11] https://ebird.org/hotspot/L6317907?yr=all&m=
[12] https://baynature.org/article/where-are-there-bats-in-the-bay-area/
[13] https://www.krauel.com/publications/Krauel2016plosone.pdf
[14] https://sfplanning.org/sites/default/files/resources/2018-08/Urban%20Bird%20Refuge.pdf

## B. Supplemental Comments - San Francisco General Plan Consistency

SINA's prior comments were focused primarily on the stadium lighting project in relation to CEQA and the San Francisco Planning Code. These supplemental comments focus specifically on consistency with the General Plan.

The draft Commission motion states: "The Department finds that the Project is, on balance, consistent with the Objectives and Policies of the General Plan." However, the Department limited its evaluation and discussion only the few General Plan elements, objectives, and policies that could be leveraged to make the project appear to be consistent with the General Plan, when it is not. The draft motion ignores the spirit and intent of the General Plan, dismisses several pertinent policies, and fails to quantify even the minimal benefits stated.

### 1. Environmental Protection Element

This Element is completely ignored in the draft motion. Policy 11.1 is relevant and discourages new uses in areas in which noise levels exceed the noise compatibility guidelines for the new use. The policy recommends that new development be examined to determine whether background and/or thoroughfare noise level is consistent with guidelines for the proposed use.

a) The policy's associated Map 1 shows background levels in the immediate neighborhood from 50 decibels to at most 65 decibels based on 2009 information[15]. The associated Land Use Compatibility Chart of Community Noise[16] for outdoor spectator sports uses specifies that for all background noise levels, new construction or development should be undertaken "only after a detailed analysis (underlines added for emphasis) of the noise reduction requirements is made". For background levels at about 72 decibels (typical background traffic noise) or higher, new construction or development "should generally not be undertaken."

b) The additional project-related noise will come primarily from the school's sound system and loud speakers, amplified recorded music, band music, cheering, car horns and air-horns (bleachers are located directly inside the school property line on 39th Avenue). The Verizon wireless ground-based equipment would create another new noise source.

c) SINA noted the need for a valid noise study in our May 6, 2020 comments (Fact and Comment 5.D) in the context of Planning Code Section 303(c)(2)(C). In our June 9, 2020 comments we noted that noise studies were conducted under CEQA review for numerous other stadium lighting projects. We also discussed the inadequacy of this project's CEQA exemption determination that dismissed potential noise impacts.

d) Unfortunately, with the ongoing COVID situation, there is no way to obtain an accurate background noise level since regular traffic and non-school related activities are not occurring normally. Similarly, there is also no way to obtain athletic field noise levels,

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[15] https://generalplan.sfplanning.org/images/I6.environmental/ENV_Map1_Background_Noise%20Levels.pdf
[16] https://generalplan.sfplanning.org/I6_Environmental_Protection.htm#ENV_TRA_10

particularly during high attendance night football games since those games are also not occurring at this time. We reiterate our contention that the project should not be approved until a valid noise study can be conducted and confirms no adverse impact.

**2. Commerce and Industry Element, Policy 1.1 and 1.2**

These policies are mis-applied in the draft motion which states: "The Project will enhance the total city living and working environment by providing recreational and communications services for residents and workers within the City."

a) Our prior comments noted that the project will not provide any recreational benefit to most residents, only to the school's students and competing teams. Our June 9, 2020 Comment 2.1 also urged the Commission to decouple the Verizon wireless installation from the stadium lighting project since each project uses the other proposed project to justify its supposed benefits and the Verizon project does not require a 90-foot pole but assumes the presence of the light poles to justify their preferred wireless location at the school. The impacts and benefits of each should be evaluated on their individual not their combined assumed merits. We reiterate our prior comments that the Verizon wireless project must consider alternative sites for the proposed wireless installation.

b) The draft motion disregards important context for Policy 1.1, which states in part: "…<u>environmental impacts of proposed developments, often previously ignored, are to be carefully evaluated before approval of a development. The economic and social benefits of such developments are often presumed, and they sometimes are still unstated and unanalyzed.</u>" Policy 1.2 states: "A critical aspect of development management is to <u>mitigate negative impacts</u> created by new development: economic, <u>aesthetic, physical, environmental, and social</u>."

c) We agree with these statements and contend that both the draft motion and CEQA exemption ignore or minimize without any basis, the stadium lighting project's environmental, aesthetic, physical and social impacts. Both the draft motion and CEQA exemption presume benefits without quantifying or analyzing them relative to the impacts which are also not quantified.

**3. Commerce and Industry Element, Policies 2.1, 2.3, 4.1, 4.2, and 8.3; and Community Safety Element Policies**

These policies are mostly and correctly applied only to the Verizon wireless installation, yet they presume benefits larger than would occur.

a) Again, the wireless project should be decoupled from the lighting project which does not provide benefits consistent with these policies. Furthermore, the proposed wireless coverage would provide these benefits only within a localized area where little business (other than possibly home-based business) occurs. The same is true for any benefits associated with the Community Safety Element. The current and proposed wireless coverage maps are shown in Figures 3 and 4 below and illustrate the limited extent of new or improved wireless coverage expected.

b) Mysteriously, the draft motion under Policy 4.2 assumes that the lighting project will enhance the business climate from hosting sporting events. Perhaps this assertion comes directly from the original 2018 project application which states: "The lights will bring people to the neighborhood, increasing business for local restaurants and stores." However, there are very few businesses within walking distance of the school that might benefit from an influx of pre- or post-game attendees as shown in Figure 5 below.

c) Visitor Trade Policy 8.3 is also mis-applied in the draft motion since the policy states: "Assure that areas of <u>particular visitor attraction</u> are provided with adequate public services…" Even if applicable to just the Verizon wireless installation, there is no basis upon which to declare a private school athletic field a "particular visitor attraction" nor does the new wireless coverage enhance communications in areas of the City with specific visitor attractions (see Figure 4).

**Figure 3. Verizon Current Coverage Map (the project location is identified as Sunset & Noriega in the map center)**

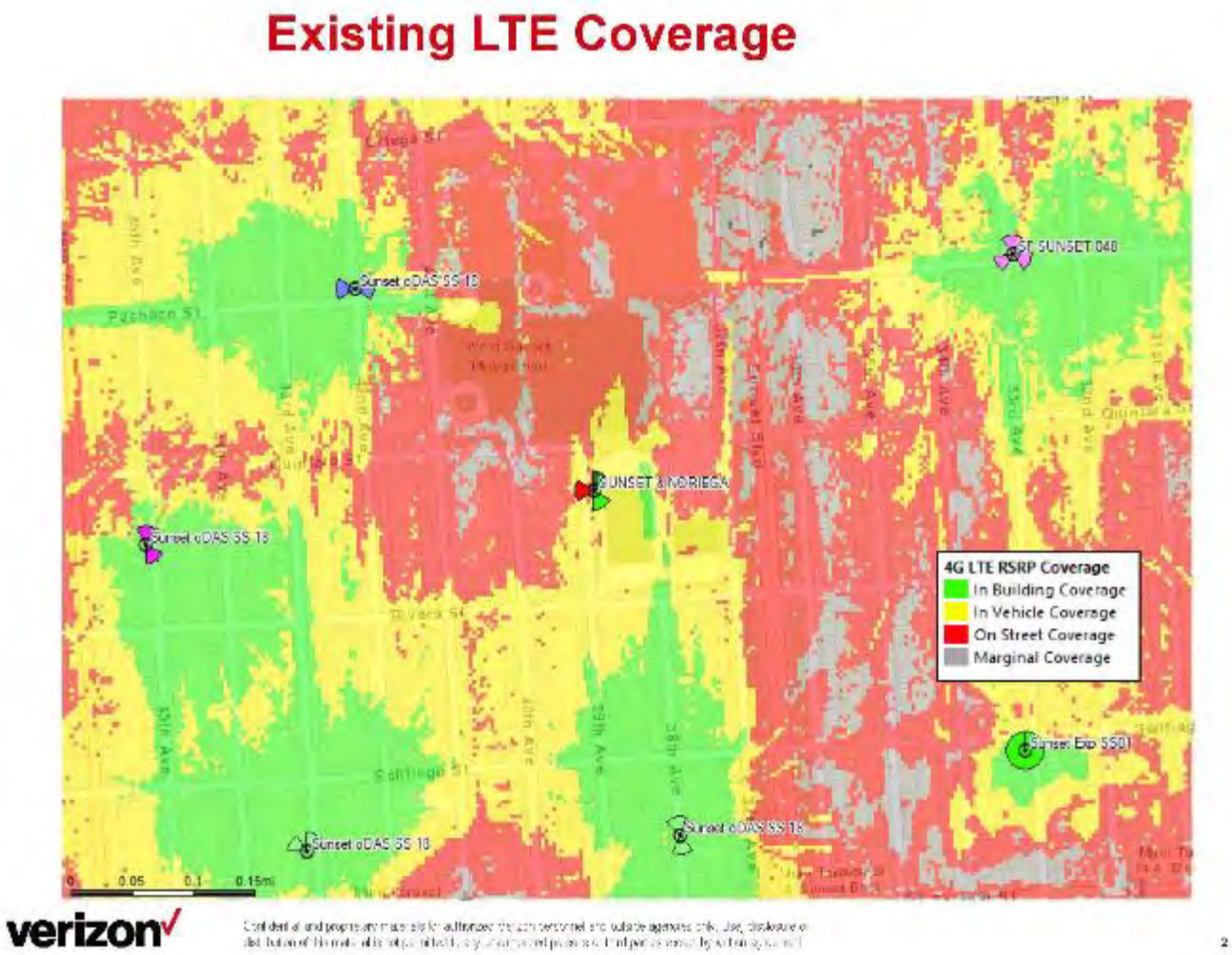

**Figure 4. Verizon Coverage Map with new Wireless Installation (the project location is identified as Sunset & Noriega in the map center)**

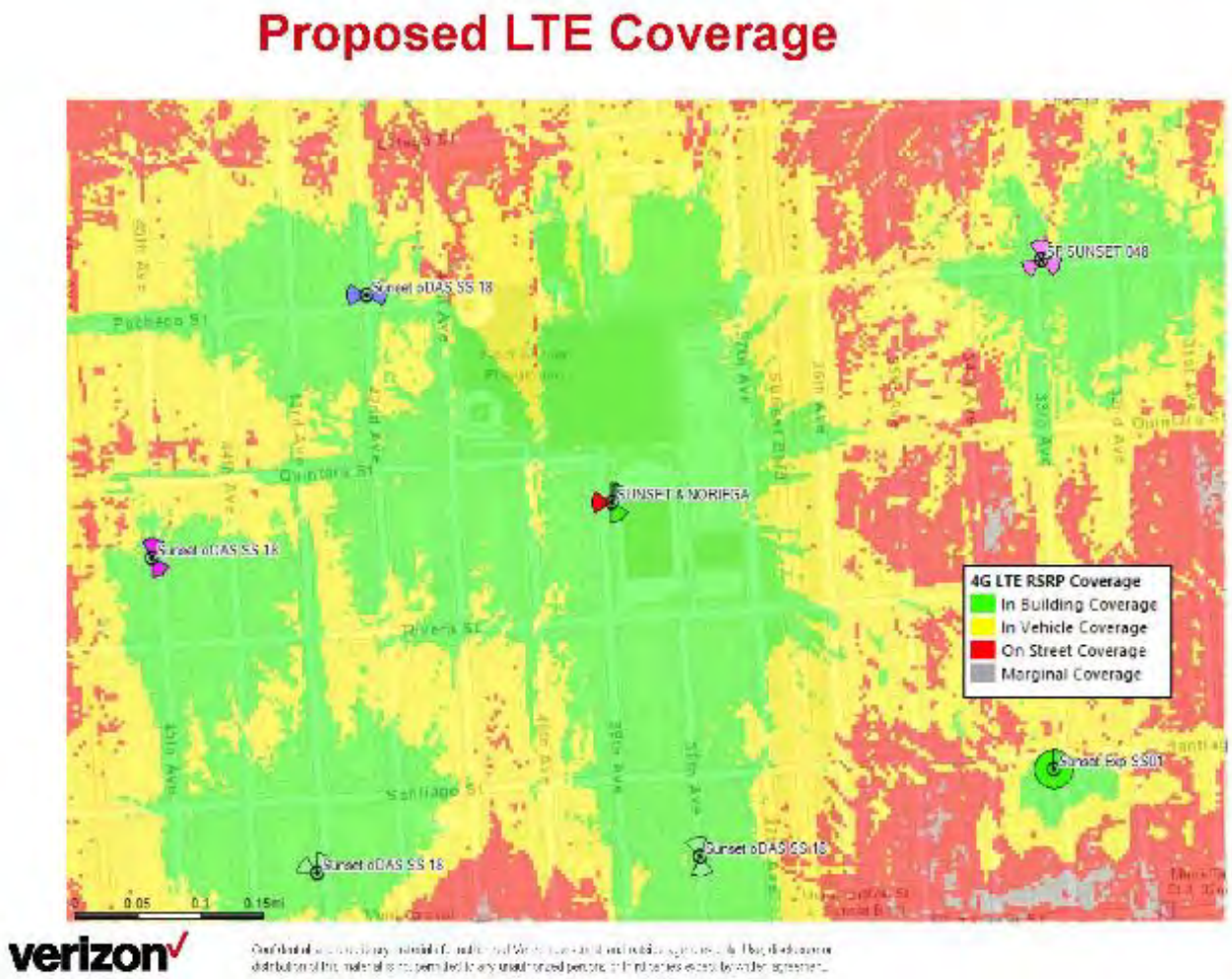

**Figure 5. Local Business Map**

## 4. Commerce and Industry Element, Policies 7.2 and 7.3

The draft motion suggests that educational services benefits would arise from the stadium lighting project, but disregards key context that must also be considered.

a) Objective 7 states: "However, future growth must be managed to achieve equitable distribution of benefits to all geographical and cultural sub-populations of the city and to minimize associated adverse effects on surrounding areas." Policy 7.2 states: "To minimize the disruption caused by institutional expansion, the city should continue its policy of reviewing expansion plans. This review examines the needs of adjacent resident areas for housing, on-street parking and safe, quiet streets as well as the needs of the institution." Policy 7.3 states, in part: "Unfortunately, the clustering of many of these major facilities in relatively few areas creates problems in the adjacent residential neighborhoods."

b) SINA's concerns with the draft motion's application of these policies are discussed in detail in our May 6, 2020 Facts and Comments 5.G and 5.H, and in our June 9, 2020 Comment 2.2. Here we simply reiterate that Saint Ignatius is an expensive private school whose benefits apply only to those students selected to attend. While the school may provide tuition assistance, it does not disclose data about the social and economic diversity of the student body or where students originate from. The school is not a neighborhood-serving school and does not provide a neighborhood benefit that could offset the stadium lighting project's adverse impacts on the neighborhood.

## 5. Commerce and Industry Element, Policy 6.9

This policy is ignored in the draft motion but is highly relevant to the stadium lighting proposal, and the additional traffic and parking strains on the neighborhood that would occur with games and practices every weeknight and some weekend nights during the school year.

a) The policy goes into great detail about conducting evaluations of traffic and parking and requires consideration of the surrounding residential neighborhoods. Most importantly, the Policy states that the proposed use should not be allowed if there is significant traffic congestion or inadequate parking.

b) The policy details what a traffic and parking analysis should involve including obtaining estimates of numbers of people and trips generated; the level of parking problems and shortages especially (but not only) during peak traffic hours; the level of additional traffic in adjacent neighborhoods; and pedestrian circulation and the potential for pedestrian/vehicle conflicts.

c) We reiterate Comment 5.C in our May 6, 2020 submittal and Comments 1.2 and 2.2 in our June 9, 2020 submittal. Namely, that a valid traffic and parking study must be conducted in order to quantify these impacts before determining if they are minimal or not. As noted above for noise in the Environmental Protection Element, it is impossible during the current COVID situation to obtain a valid baseline or to test *in situ* project-related impacts on traffic and parking. We reiterate our contention that the project

should not be approved until a valid traffic and parking study can be conducted and confirms no adverse impacts.

**6. Housing Element, Policy 10.1**

This policy is not included in the draft motion but provides important context relevant to the lighting project. The policy states in part**: "**There is a clear public benefit to creating, and applying, a strict approach to regulatory land use controls." This statement is more applicable to Comments 1.2 and 2.2 in our June 9, 2020 submittal related to CEQA and to the Planning Code as applied in the RH-1 district for this project. The school requests a rear yard modification that would allow two of the stadium lights and the Verizon wireless ground-based installation directly inside the property line. The project is exempt from the 40-foot height restriction as "light standards" or alternatively as "wireless communications facilities". As noted above, the bulk of the light arrays at each of the pole tops would be huge and we contend that these abnormal applications of the planning code (and CEQA) ignore the spirit and intent of the General Plan's strict approach.

**7. Housing Element, Policy 11.3**

This policy is also ignored in the draft motion. The policy states: "Ensure growth is accommodated without substantially and adversely impacting existing residential neighborhood character." Our prior and current comments detail the many ways that the stadium lighting project would adversely substantially, adversely, and permanently impact the neighborhood.

**8. Housing Element, Policy 11.8**

The draft motion includes this policy which states: "The scale and design of permitted commercial and institutional buildings should acknowledge and respond to the surrounding neighborhood context, incorporating neighborhood specific design guidelines whenever possible."

a) The draft motion twists the intent of this policy in a bizarre way, by stating: "the Project will minimize disruption by expanding the school vertically on the existing campus, which has been a part of the neighborhood since 1969."

b) We commented on this in Comment 2.2 of our June 9, 2020 but it remains a baffling and extremely weak argument and is certainly not within the spirit or intent of the General Plan. Furthermore, the school has been in the neighborhood for over 50 years and has undertaken numerous expansions that have incrementally changed the nature and character of the surrounding neighborhood. The proposed stadium lights would be the most glaring addition and would be grossly out of scale with the neighborhood.

## 9. Urban Design Element

The draft motion completely ignores the Urban Design Element although there are several important policies that are very relevant to the stadium lighting project.

a) Policy 1.1 addresses the importance of protecting major views in the city. It states: "Overlooks and other viewpoints for appreciation of the city and its environs should be protected and supplemented, by limitation of buildings and other obstructions where necessary…Visibility of open spaces, especially those on hilltops, should be maintained and improved..." The addition of four 90-foot poles with large lighting arrays at the top in an area with 40-foot height restrictions would clearly constitute an obstruction that would adversely impact viewpoints from locations such as Golden Gate Heights Park, Larson Peak, and Sunset Reservoir Park which all have sweeping views of the Sunset District and ocean.

b) Policy 1.12 states: "There are other developed areas which, though they may not contain individual buildings that are historic or otherwise outstanding, have a special character worthy of preservation. These areas have an unusually fortunate relationship of building scale, landscaping, topography and other attributes that makes them indispensable to San Francisco's image. Threats to the character of these areas are sure to be met with intense concern by their own residents and by the public at large." We contend that the Outer Sunset District has these qualities and a majority of immediate neighbors strongly oppose, and the public at large would also oppose, these stadium lights which will create a huge visual blight on the landscape during both daytime and nighttime and clearly threaten the character of this area. At this time, SINA is aware of at least 73% of residents on the closest blocks of 39th Avenue and Rivera Street who have explicitly opposed the lighting project. In the next closest blocks on Rivera and Quintara Streets at least 83% of residents are opposed, as are at least 50% of residents on the closest block of 40th Avenue.

c) Objective 2 covers conservation of resources. In the table entitled Fundamental Principles for Conservation, item #17 states: "Blocking, construction or other impairment of pleasing street views of the Bay or Ocean, distant hills, or other parts of the city can destroy an important characteristic of the unique setting and quality of the city." The addition of 90-foot poles with large arrays would certainly impair pleasing street views from uphill toward the ocean and from downhill toward the hills.

d) Objective 3 covers neighborhood environments and states: "Studies show that the outstanding concerns of people today in their neighborhood environment are matters of health and safety. Traffic is the leading issue, with automobiles moving through residential areas in large volumes and at high speeds, producing noise and pollutants and putting pedestrians in constant danger. With each increase in traffic the streets become less a part of the living environment and more a world of their own. Residents find the streets unsafe and unpleasant, and try to shut them out…Some neighborhoods have greater needs because their residents live in conditions of greater density, or because the residents include more children and older people who tend to live within a smaller world in which the resources close at hand are the most important." The neighborhood surrounding the

school has a large population of elderly and families with small children, as well as two public schools, a library, playground, and public recreation area used by neighborhood children and adults would be most affected by the increased traffic and related health and safety impacts that the stadium lighting project would bring.

e) Objective 4 covers improving neighborhood environments to increase personal safety, comfort, pride and opportunity. Policy 4.1 states: "In order to reduce the hazards and discomfort of traffic in residential neighborhoods, a plan for protected residential areas should be put into effect…The speed and volume of traffic on protected streets should be limited by all practical means." We note that the area surrounding the school between Noriega and Taraval Streets is a protected residential area[17] and this designation should be taken into consideration when considering traffic impacts from the project.

f) Policy 4.1.4 states: "Other clutter is produced by elements placed in the street areas. The undergrounding of overhead wires should continue at the most rapid pace possible, with the goal the complete elimination of such wires within a foreseeable period of time. Every other element in street areas, including public signs, should be examined with a view toward improvement of design and elimination of unnecessary elements." We contend that 90-foot poles with their large light arrays constitute significant clutter that is unnecessary for the neighborhood and should be avoided in the protected residential area. Furthermore, stadium lighting is not necessary for the school's athletic program to continue be successful like at other, larger schools in the City that do not have lights (see Comment 3.2 in SINA's June 9, 2020 submittal).

g) Policy 4.15 states: "In residential areas of lower density, the established form of development is protected by limitations on coverage and requirements for yards and front setbacks. These standards assure provision of open space with new buildings and maintenance of sunlight and views. Such standards, and others that contribute to the livability and character of residential neighborhoods, should be safeguarded and strengthened." We contend that allowing the school to modify its rear yard restriction down to virtually no setback in an RH-1 district and allowing 90-foot poles in a 40-foot height district even if exempted, is inconsistent with this policy.

## C. Concluding Comments

The draft motion states: "Overall, the Department also finds the project to be necessary, desirable, and compatible with the surrounding neighborhood, and not to be detrimental to persons or adjacent properties in the vicinity. The Project complies with all relevant requirements and standards of the Planning Code and is consistent with objectives and policies of the General Plan."

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[17] https://generalplan.sfplanning.org/images/I5.urban_design/urb_map7.pdf

For all the reasons explained herein and in SINA's two prior comment submittals, we strongly refute to this conclusion. SINA has consulted with a number of key experts and we have been able to expose and detail the many compelling reasons why the Saint Ignatius Stadium Lighting project should not be approved. In addition, the Verizon wireless project should be decoupled from the lighting project and a separate application submitted to the Planning Department for that project - to ensure that impacts, benefits, and alternatives to each project are considered on their own and not conflated between the two projects.

We hope you recognize the significant gaps in the project plan, the flawed permit application, the lack of thorough CEQA review, and the project's incompatibility with the General Plan. We are particularly concerned with the lack of CEQA review and dismissal of numerous portions of the General Plan that are applicable to this project. The CEQA exemption determination states: "Based on the planning department's 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." As noted in Comment 1.2 of our June 9, 2020 submittal, we question this assertion as a valid basis for complete disregard of the potentially significant impacts of this project.

When they first proposed stadium lighting (in 2015) , Saint Ignatius hosted two in-person neighborhood discussion meetings and engaged in email communications with SINA during 2016. We engaged in open discussions with the school administration regarding their plans and the neighbors' objections. Now the school is refuses to engage further with the neighborhood community and directly answer questions or to have an open dialogue, even by remote meetings. Additionally, the school has dismissed SINA's suggestions of an alternative plan for their large night time games despite our repeated requests to jointly discuss, brainstorm, and craft a viable alternate option.

The school is giving its neighbors only one option – permanent stadium lights – impacting the neighborhood every weeknight of the school year and for up to 20 large nighttime events (up to 2,800 people) a year. The school insists these lights are necessary for their current sports programs, however SI's student body has not increased, and we are unaware of any new sports teams or activities. Permanent lighting would clearly enhance the school's exclusive reputation, recruitment efforts, and would provide a benefit to its private school students. However, if the lights are installed the adverse impacts would also be permanent.

We believe it would be impossible to mitigate for all of the potentially significant impacts of this project. Furthermore, oversight of compliance with the CUA conditions would, in practicality, fall to the neighbors – a difficult, if not impossible, and certainly unreasonable burden. We have clearly shown how these stadium lights would, in no conceivable way, benefit the public, or enhance our neighborhood or its character. We therefore urge you to not approve this stadium lighting project.

## List of Appendices

**APPENDIX A: LIGHTING CONSULTANT REPORT**

**APPENDIX B: US FISH AND WILDLIFE SERVICE IPAC REPORT OF THREATENED AND ENDANGERED SPECIES**

**APPENDIX C: BIRDS OBSERVED AT WEST SUNSET PLAYGROUND, 2015 - PRESENT**

# APPENDIX A

# LIGHTING CONSULTANT REPORT

# St. Ignatius Sports Lighting Proposal Response

Kera Lagios, LEED AP, Assoc. IALD
2020-07-20

In order to understand the impacts of the proposed lighting installation at St. Ignatius, it is important to understand several fundamental issues related to light and specifically light at night.

## A. Light Levels

The addition of the sports lighting significantly increases the quantity of light in the area, both from what it is currently, and above what is recommended by the IES (Illuminating Engineering Society), and vertical illuminances are underestimated by Musco's photometrics.

<u>1. IES recommended light levels:</u>

a. According to the IES RP-33-14_Lighting for Exterior Environments[1], lighting for low-activity pedestrian areas (residential areas) in LZ1 and LZ2 range from 0.9 fc (10 lux) horizontal, 0.19 fc (2 lux) vertical immediately near entries and exits (e.g. front doors), to 0.09 fc (1 lux) horizontal, 0.0 fc (0 lux) vertical for paths to curbs.

b. The Musco photometrics show 0.33 fc horizontal, 0.42 fc vertical at the facades of the houses directly across 39th avenue.[2] **These light levels are 2-3 times higher than recommended for those residential areas.**

c. In addition, Musco is showing 6 fc horizontally and almost 7 fc vertically at the property line, which is much higher than even a "high" pedestrian light level of 1 fc.

<u>2. Vertical illuminance is more important than horizontal in this case</u>

a. While many lighting studies focus on horizontal measurements, here we are very concerned with vertical measurements for two reasons:

   i. Given the height of the poles, the lighting impact will be more extreme on the vertical plane, and

   ii. We are concerned with "what people see" both at ground level and from the windows.

b. Musco's photometrics show the vertical illuminance of 0.42 fc (~4.2 lux) at the facades of the residences, however, this measurement is taken 3'-0" above the ground. Not only is a typical adult eye height around 5'-0" or more, this does not at all represent the amount of light entering the windows which are mostly on the 2nd level of the homes. Given the mounting heights of the lights (15',16', 22', and 65', 87', 90'), much more light will be present at eye level above grade and entering the residential windows, approx. 12'-20'

[1] "Lighting for Exterior Environments", IES RP-33-14, Illuminating Engineering Society, 2014.
[2] 2020 Musco Photometrics, St. Ignatius Prep School FB/SO, pages 11, 12.

above grade. The light levels there are going to be higher than what Musco is representing.

c. We can use LEED v4.1 Sustainable Sites, Light Pollution Reduction credit as a guideline for acceptable levels of light trespass. Following LEED we see that, measured at the centerline of 39th Avenue, on a vertical plane extending up to 33' above grade, the limits on illuminance are: 0.05 fc (0.54 lux) for LZ1, and 0.10 fc (1.07 lux) for LZ2.[3] The project's photometrics show as much as 2.6 fc at 0'-0" off the ground, 26 times the higher value (LZ2). Clearly, even if LEED is not being pursued, this is an excessive amount of light spilling off of the property.

## B. Glare and Brightness

The negative issues caused by the proposed sports lighting not only include the glare produced by the fixtures themselves, but by how much brighter the area, as a whole, will be.

1. Luminance ("brightness") is important

a. The Musco photometrics do not show measurements of luminance. Loosely speaking, luminance is a measure of "brightness". The addition of 50 fc of light across the field will turn the field itself into a bright, light reflecting surface, as well as any other surfaces nearby (sidewalks, bleachers, out-building walls, etc.). These surfaces themselves, especially when seen from the 2nd story windows of homes will have a significant deleterious impact on the nighttime environment of the neighborhood.

b. Below are two images showing the effect of a sports lighting installation on brightness of the adjacent areas. While this is a different installation, the concept of brightness is clearly illustrated.

[3] "Light Pollution Reduction - Language," LEED BD+C: New Construction v4.1 - LEED v4.1 https://www.usgbc.org/credits/new-construction-core-and-shell-schools-new-construction-retail-new-construction-healthc-163?return=/credits/New%20Construction/v4.1/Sustainable%20sites

These two photos were taken at the same facility, on opposite sides of the access road. (Left) Pointed toward the athletic field. (Right) Pointed toward the neighborhood.

*Image Source: IDA-Criteria for Community-Friendly Outdoor Sports Lighting v1.0, November 28, 2018*

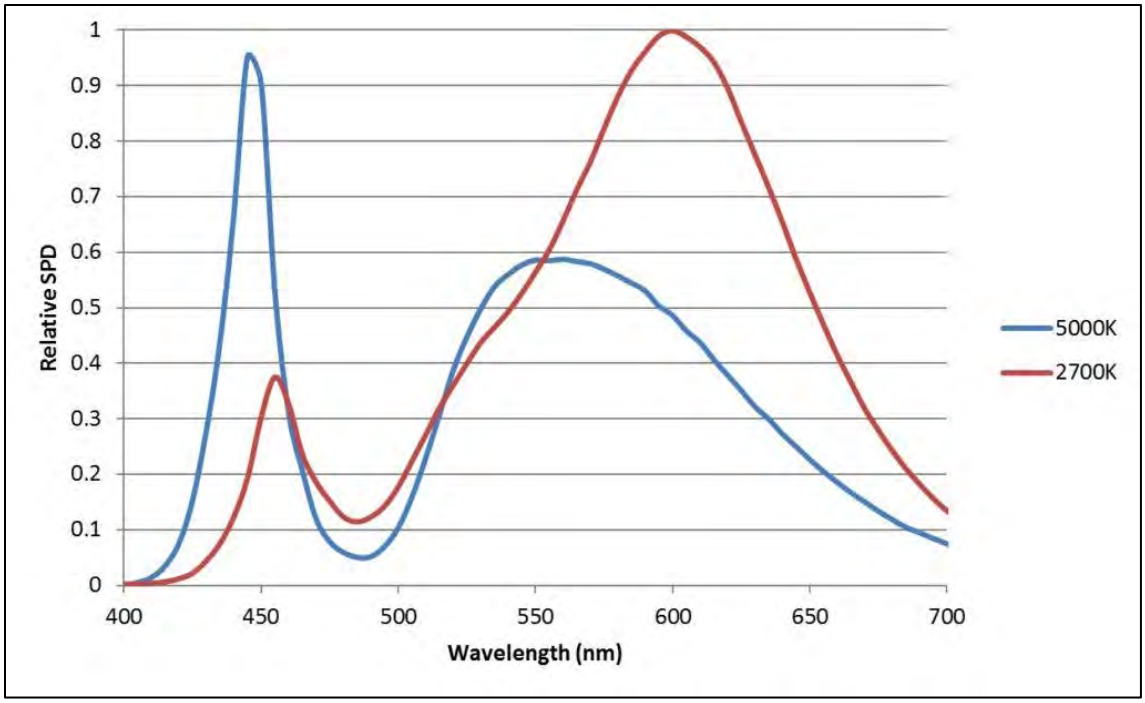
2. Glare due to nighttime scotopic v. photopic vision

a. At night, our eyes "shift" from what is called "photopic" to "mesopic" or "scotopic" vision. You've experienced this if you have come out of a dark movie theater into the daylight. In the theater, your eyes have adapted to the dark and switched over to mesopic or scotopic vision, and then attempt to switch back to photopic in the daylight.

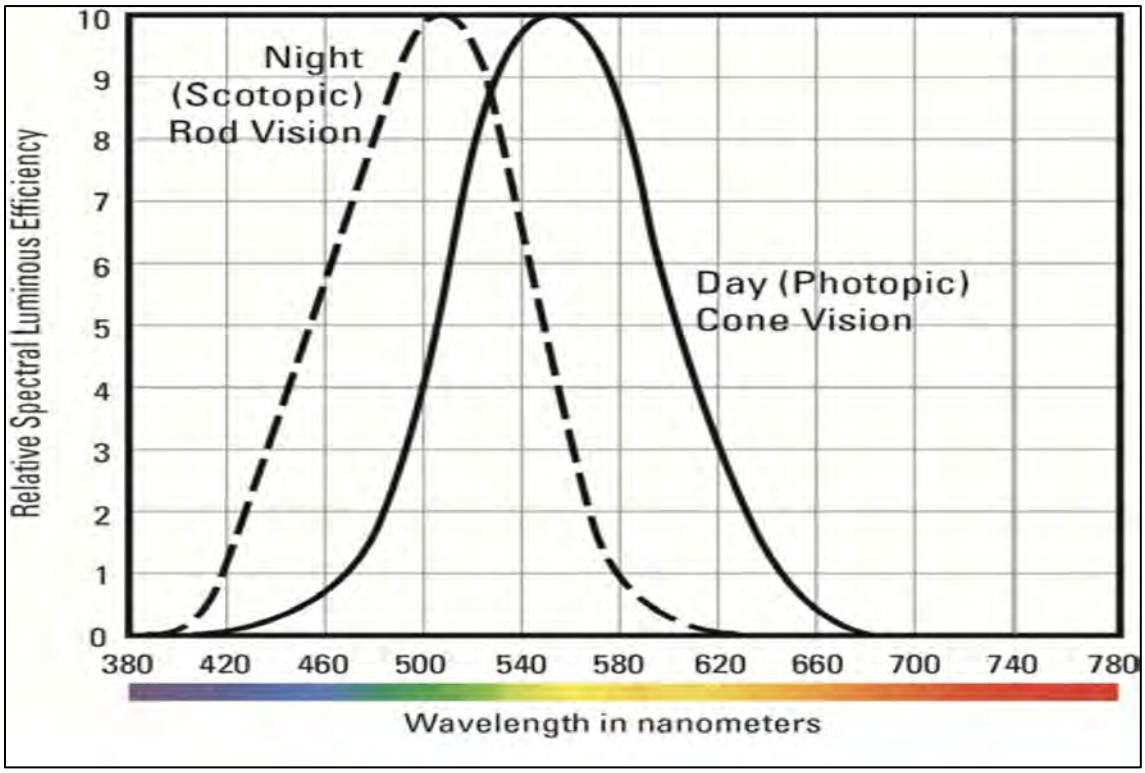
b. Scotopic and mesopic vision are more sensitive to green and blue light than photopic vision is, meaning that 'cooler' light will appear brighter than a similar light source that is more yellow.

c. The Musco lights are 5700K, which are considered very "cool" and mimic daylight In fact, 5500K is equivalent to noon-time sunlight and 6000K is equivalent to a camera's electronic flash.[4] While these are more efficient in terms of energy, they produce more glare than a similar fixture with a lower color temperature (e.g. 3000K). Thus, the same quantity of light will appear even brighter. This effect is worse for people over 65.[5]

[4] https://hci-led.com/wp-content/uploads/2015/08/Don-Werthmann-on-Kelvin.pdf
[5] "Light and Vision", IES Ready Reference App, Illuminating Engineering Society, 2020.




*Notice the larger peak in the 440-450 nm range with the 5000k (cooler) LED source, as opposed to the 2700K (warmer) LED source. This is significant for scotopic sensitivity as well as melanopic sensitivity.*
*Image source: [https://www.allthingslighting.org/index.php/2019/02/15/filtered-leds-and-light-pollution/](https://www.allthingslighting.org/index.php/2019/02/15/filtered-leds-and-light-pollution/)*




*Notice how the Night (Scotopic) peak is shifted to the left, closer to the blue and green wavelengths (around 500 nm).*
*Image source: "Light and Vision", IES Ready Reference App, Illuminating Engineering Society, 2020.*

3. Glare (Musco lights)

a. In Musco's diagram addressing glare, the facades of the houses along 39th avenue are mostly in the yellow band, indicating 1,000 to 5,000 candela. By Musco's own legend, this is not negligible in terms of the amount of glare (which they indicate as <= 500 candela).[6]

b. Musco has not provided the IES files for their luminaires. As such it is not possible to do a separate analysis of the installation, particularly the characteristics of the luminaires as they relate to glare, backlight and uplight.

c. It should be noted, that while Musco provided a diagram showing their TLC technology emits fewer candelas than other sources[7], it is not clear which luminaire is being used in that diagram, nor how many are used in the proposed installation.

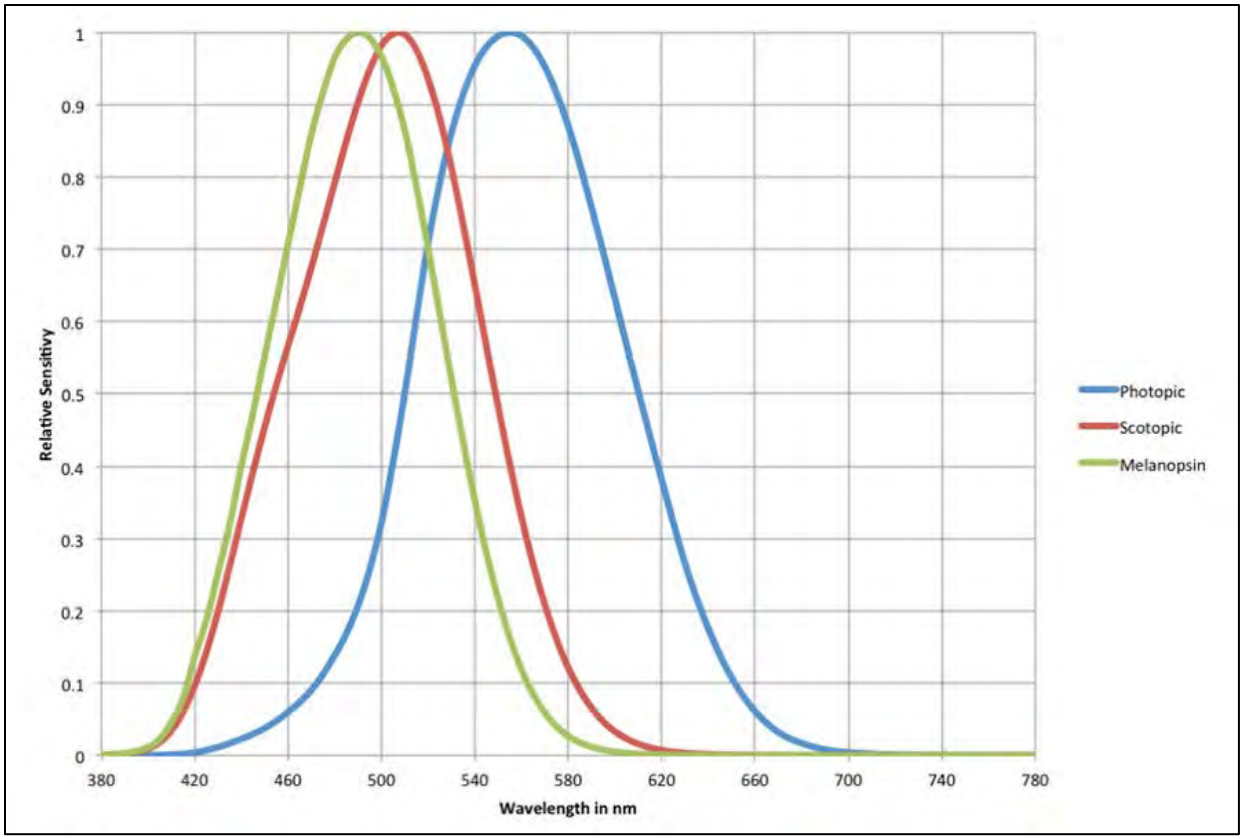
d. While the Musco fixtures may be better than other sources/installations, due to the proximity and duration of the proposed lighting and schedule, it is still too much for this residential area.

## C. Light + Health

Research over the past few decades has shown that our bodies regulate our health in part due to the natural cycle of light and dark, called the circadian cycle.[8] Disruptions to that cycle have been shown to impact health through changes to hormones, sleep and body temperature. The regulation of circadian rhythms by light is controlled by suppression of melatonin. In the morning, bright, blue light suppresses melatonin and encourages us to wake up, and later in the evening, lower light levels help to stimulate melatonin and encourage our bodies to go to sleep.

It should be noted that the cells in the eye that control this are different than the rods and cones that control vision. These cells (called intrinsically photosensitive retinal ganglion cells or "iprgcs") respond to light differently and are most sensitive to light in the blue range around 480 nm, and this system is termed "melanopic".

[6] 2020 Musco Photometrics, St. Ignatius Prep School FB/SO, page 18.
[7] Evolution of Light Control - Musco - St. Ignatius Light Poles.
[8] Light and Human Health: An Overview of the Impact of Optical Radiation on Visual, Circadian, Neuroendocrine and Neurobehavioral Responses, IES TM-18-18, Illuminating Engineering Society, 2018.




*Graph showing photopic, scotopic and melanopic responses to visible wavelengths of light showing differing peak sensitivities.*
*Image source: https://www.ies.org/fires/simplifying-melanopsin-metrology/*

1. Circadian rhythms are affected by many things including: the age of the individual, recent sleep patterns, time during the day/night when blue light is present, quantity of blue light, duration of exposure to blue light, and angle/location of the light.[9]

a. The Musco lights, as mentioned, are 5700K CCT (correlated color temperature) which are "blue-er" lights than, say a 3000K source. There is a larger percentage of the light emitted in the 480 nm range, which stimulates the melanopic system. Therefore, it has a greater tendency to disrupt the circadian system.

b. Because the circadian system responds to the quantity of light received at eye level, the higher vertical illuminances created by the Musco lights are going to elevate the impact.

c. Most importantly, the lights will be on for up to 55% of the entire year and virtually every weeknight during the school year, for up to 4 or 5 hours at a time in winter. This significant increase in the quantity and duration of blue-enriched light during dark hours has the potential to have significant impacts on circadian health, especially in children who are much more vulnerable to such disruptions.

[9] Light and Human Health: An Overview of the Impact of Optical Radiation on Visual, Circadian, Neuroendocrine and Neurobehavioral Responses, IES TM-18-18, Illuminating Engineering Society, 2018.

## D. Light pollution

Finally, the Musco lights will negatively affect light pollution in the area, particularly due to the frequency of fog, and they will have a potential negative effect on the ecosystems in the relatively nearby ocean and shoreline habitats.

1. Fog increases the light pollution because it both disperses light through the water molecules suspended in the air and serves as an outdoor “ceiling” which the light bounces off of and distributes back down to the ground.

2. Musco has not provided the IES photometric data files (.ies files) or any report on the photometric distribution of the luminaires, so it is not possible to evaluate the BUG (backlight-uplight-glare) ratings of the selected luminaires to evaluate their characteristics. Typically, sports lighting is not well shielded in any direction and contributes greatly to light pollution as the luminaires are angled. In order to verify any claims of shielding, Musco needs to provide the IES files and luminaire photometric report.

3. Like humans, animals and plants also have circadian rhythms which are impacted by changes in light and dark. Sea turtles are probably the most well-known example of animals whose reproductive processes are disrupted by light levels near beaches, however, other plants and animals are susceptible as well. [10]

[10] “Lighting for Exterior Environments”, IES RP-33-14, Illuminating Engineering Society, 2014.

# APPENDIX B

# US FISH AND WILDLIFE SERVICE IPAC REPORT OF THREATENED AND ENDANGERED SPECIES

**IPaC** Information for Planning and Consultation **U.S. Fish & Wildlife Service**

# IPaC resource list

**This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be** directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

NOT FOR CONSULTATION

## Location

San Francisco County, California

## Local office

**Sacramento Fish And Wildlife Office**

(916) 414-6600
(916) 414-6713

# Endangered species

**This resource list is for informational purposes only and does not constitute an analysis of project level impacts.**

**The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move,** and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

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1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information.
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

**The following species are potentially affected by activities in this location:**

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# Mammals

| NAME | STATUS |
|---|---|
| **Salt Marsh Harvest Mouse** Reithrodontomys raviventris<br>**No critical habitat has been designated for this species.**<br>https://ecos.fws.gov/ecp/species/613 | **Endangered** |
| **Southern Sea Otter** Enhydra lutris nereis<br>**No critical habitat has been designated for this species.**<br>https://ecos.fws.gov/ecp/species/8560 | **Threatened**<br>Marine mammal |

# Birds

| NAME | STATUS |
|---|---|
| California Clapper Rail Rallus longirostris obsoletus<br>No critical habitat has been designated for this species.<br>https://ecos.fws.gov/ecp/species/4240 | Endangered |
| California Least Tern Sterna antillarum browni<br>No critical habitat has been designated for this species.<br>https://ecos.fws.gov/ecp/species/8104 | Endangered |
| Marbled Murrelet Brachyramphus marmoratus<br>There is **final** critical habitat for this species. Your location is outside the critical habitat.<br>https://ecos.fws.gov/ecp/species/4467 | Threatened |
| Short-tailed Albatross Phoebastria (=Diomedea) albatrus<br>No critical habitat has been designated for this species.<br>https://ecos.fws.gov/ecp/species/433 | Endangered |
| Western Snowy Plover Charadrius nivosus nivosus<br>**There is final critical habitat for this species. Your location is outside the critical habitat.**<br>https://ecos.fws.gov/ecp/species/8035 | Threatened |
| **Yellow-billed Cuckoo** Coccyzus americanus<br>**There is proposed critical habitat for this species. Your location is outside the critical habitat.**<br>https://ecos.fws.gov/ecp/species/3911 | **Threatened** |

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# Reptiles

| NAME | STATUS |
|---|---|
| **Green Sea Turtle** Chelonia mydas<br>**No critical habitat has been designated for this species.**<br>https://ecos.fws.gov/ecp/species/6199 | **Threatened** |
| **San Francisco Garter Snake** Thamnophis sirtalis tetrataenia<br>**No critical habitat has been designated for this species.**<br>https://ecos.fws.gov/ecp/species/5956 | **Endangered** |

# Amphibians

| NAME | STATUS |
|---|---|
| California Red-legged Frog Rana draytonii<br>There is **final** critical habitat for this species. Your location is outside the critical habitat.<br>https://ecos.fws.gov/ecp/species/2891 | Threatened |

# Fishes

| NAME | STATUS |
|---|---|
| Delta Smelt Hypomesus transpacificus<br>There is **final** critical habitat for this species. Your location is outside the critical habitat.<br>https://ecos.fws.gov/ecp/species/321 | Threatened |
| Tidewater Goby Eucyclogobius newberryi<br>There is **final** critical habitat for this species. Your location is outside the critical habitat.<br>https://ecos.fws.gov/ecp/species/57 | Endangered |

# Insects

| NAME | STATUS |
|---|---|
| **Bay Checkerspot Butterfly** Euphydryas editha bayensis<br>**There is final critical habitat for this species. Your location is outside the critical habitat.**<br>https://ecos.fws.gov/ecp/species/2320 | **Threatened** |

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**Callippe Silverspot Butterfly** Speyeria callippe callippe — **Endangered**

**There is proposed critical habitat for this species. The location of the critical habitat is not available.**
https://ecos.fws.gov/ecp/species/3779

**Mission Blue Butterfly** Icaricia icarioides missionensis — **Endangered**

**There is proposed critical habitat for this species. The location of the critical habitat is not available.**
https://ecos.fws.gov/ecp/species/6928

Myrtle's Silverspot Butterfly Speyeria zerene myrtleae — Endangered

No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/6929

San Bruno Elfin Butterfly Callophrys mossii bayensis — Endangered

There is **proposed** critical habitat for this species. The location of the critical habitat is not available.
https://ecos.fws.gov/ecp/species/3394

# Flowering Plants

| NAME | STATUS |
|---|---|
| Franciscan Manzanita Arctostaphylos franciscana<br>There is **final** critical habitat for this species. Your location is outside the critical habitat.<br>https://ecos.fws.gov/ecp/species/5350 | Endangered |
| Marin Dwarf-flax Hesperolinon congestum<br>No critical habitat has been designated for this species.<br>https://ecos.fws.gov/ecp/species/5363 | Threatened |
| Marsh Sandwort Arenaria paludicola<br>**No critical habitat has been designated for this species.**<br>**https://ecos.fws.gov/ecp/species/2229** | Endangered |
| **Presidio Clarkia** Clarkia franciscana<br>**No critical habitat has been designated for this species.**<br>**https://ecos.fws.gov/ecp/species/3890** | **Endangered** |

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**Presidio Manzanita** Arctostaphylos hookeri var. ravenii **Endangered**
**No critical habitat has been designated for this species.**
https://ecos.fws.gov/ecp/species/7216

**Robust Spineflower** Chorizanthe robusta var. robusta **Endangered**
**There is final critical habitat for this species. Your location is outside the critical habitat.**
https://ecos.fws.gov/ecp/species/9287

**San Francisco Lessingia** Lessingia germanorum (=L.g. var. germanorum) **Endangered**
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/8174

Showy Indian Clover Trifolium amoenum Endangered
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/6459

White-rayed Pentachaeta Pentachaeta bellidiflora Endangered
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/7782

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## Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

# Migratory birds

**Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].**

**Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.**

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1. The Migratory Birds Treaty Act of 1918.

2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php
- Measures for avoiding and minimizing impacts to birds http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php
- Nationwide conservation measures for birds http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

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| NAME | BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.) |
|---|---|

**Allen's Hummingbird** Selasphorus sasin — **Breeds Feb 1 to Jul 15**

**This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.**
https://ecos.fws.gov/ecp/species/9637

**Bald Eagle** Haliaeetus leucocephalus — **Breeds Jan 1 to Aug 31**

**This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.**
https://ecos.fws.gov/ecp/species/1626

Black Oystercatcher Haematopus bachmani — Breeds Apr 15 to Oct 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9591

Black Swift Cypseloides niger — Breeds Jun 15 to Sep 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/8878

Black Turnstone Arenaria melanocephala — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Burrowing Owl Athene cunicularia — Breeds Mar 15 to Aug 31

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/9737

Clark's Grebe Aechmophorus clarkii — Breeds Jan 1 to Dec 31

This is a Bird of Conservation Concern (BCC) throughout its range in **the continental USA and Alaska.**

**Common Yellowthroat** Geothlypis trichas sinuosa — **Breeds May 20 to Jul 31**

**This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA**
https://ecos.fws.gov/ecp/species/2084

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**Costa's Hummingbird** Calypte costae — **Breeds Jan 15 to Jun 10**

**This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA**
https://ecos.fws.gov/ecp/species/9470

**Golden Eagle** Aquila chrysaetos — **Breeds Jan 1 to Aug 31**

**This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.**
https://ecos.fws.gov/ecp/species/1680

Lawrence's Goldfinch Carduelis lawrencei — Breeds Mar 20 to Sep 20

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9464

Lewis's Woodpecker Melanerpes lewis — Breeds Apr 20 to Sep 30

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9408

Long-billed Curlew Numenius americanus — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/5511

Marbled Godwit Limosa fedoa — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9481

Nuttall's Woodpecker Picoides nuttallii — Breeds Apr 1 to Jul 20

**This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA**
https://ecos.fws.gov/ecp/species/9410

**Oak Titmouse** Baeolophus inornatus — **Breeds Mar 15 to Jul 15**

**This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.**
https://ecos.fws.gov/ecp/species/9656

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| | |
|---|---|
| **Rufous Hummingbird** selasphorus rufus<br>**This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.**<br>**https://ecos.fws.gov/ecp/species/8002** | **Breeds elsewhere** |
| **Short-billed Dowitcher** Limnodromus griseus<br>**This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.**<br>**https://ecos.fws.gov/ecp/species/9480** | **Breeds elsewhere** |
| Song Sparrow Melospiza melodia<br>This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA | Breeds Feb 20 to Sep 5 |
| Spotted Towhee Pipilo maculatus clementae<br>This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA<br>https://ecos.fws.gov/ecp/species/4243 | Breeds Apr 15 to Jul 20 |
| Tricolored Blackbird Agelaius tricolor<br>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.<br>https://ecos.fws.gov/ecp/species/3910 | Breeds Mar 15 to Aug 10 |
| Whimbrel Numenius phaeopus<br>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.<br>https://ecos.fws.gov/ecp/species/9483 | Breeds elsewhere |
| Willet Tringa semipalmata<br>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. | Breeds elsewhere |
| **Wrentit** Chamaea fasciata<br>**This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.** | **Breeds Mar 15 to Aug 10** |

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# Probability of Presence Summary

**The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ**

"Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

**Probability of Presence ( )**

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

**Breeding Season ( )**
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

**Survey Effort (|)**
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

**No Data (–)**
A week is marked as having no data if there were no survey events for that week.

**Survey Timeframe**
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

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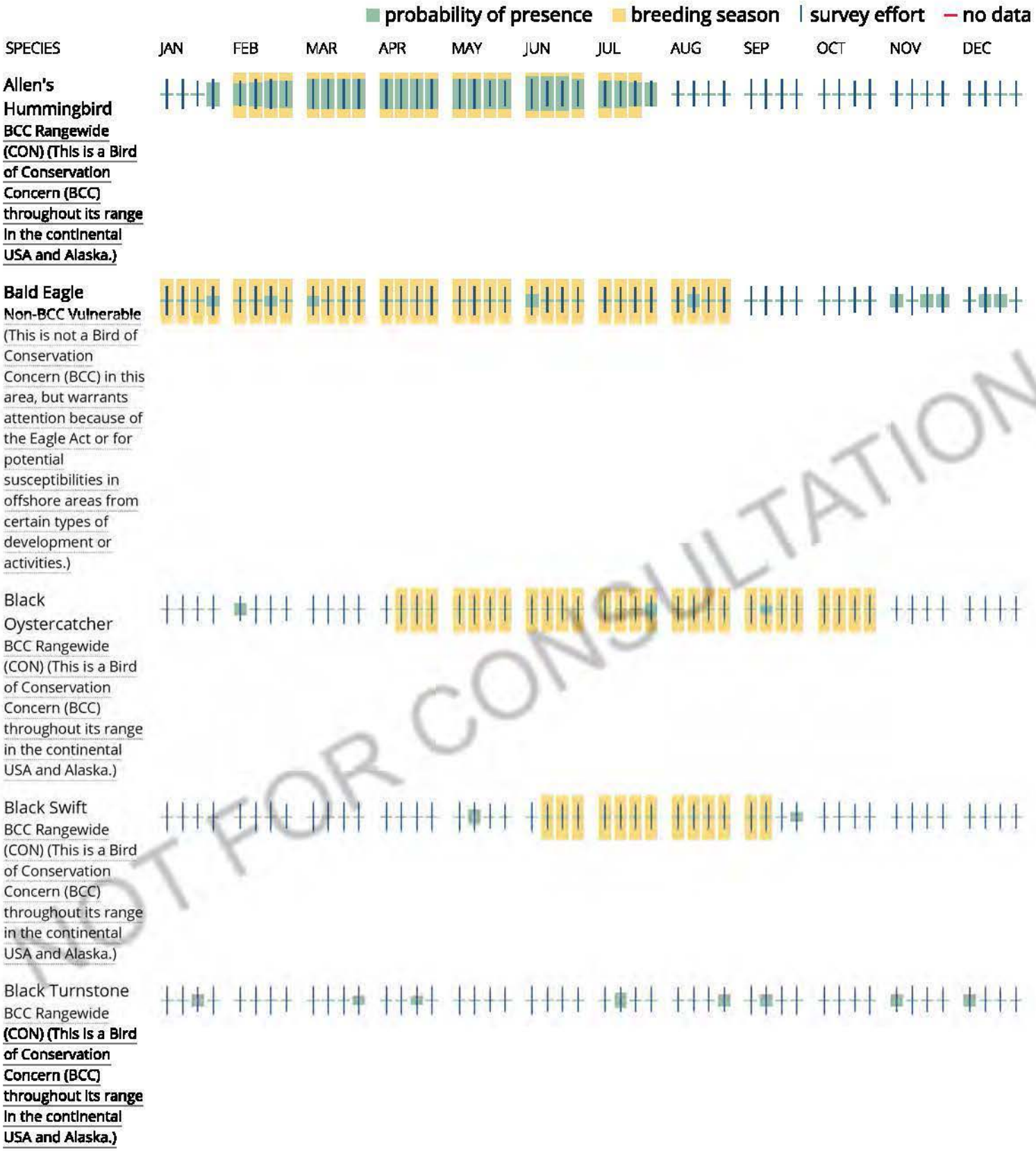


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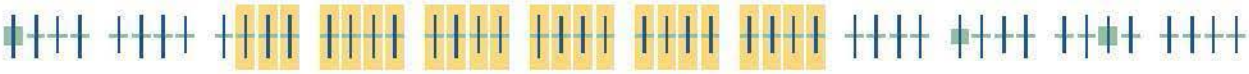
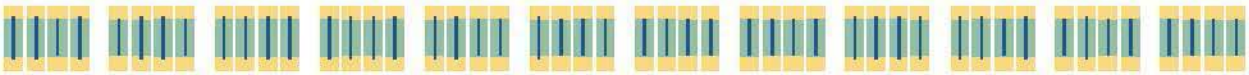
**Burrowing Owl**
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)



**Clark's Grebe**
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

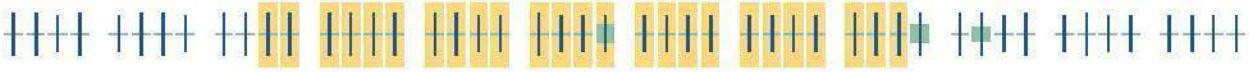


Common Yellowthroat
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Costa's Hummingbird
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Golden Eagle
Non-BCC Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

**Lawrence's Goldfinch**
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



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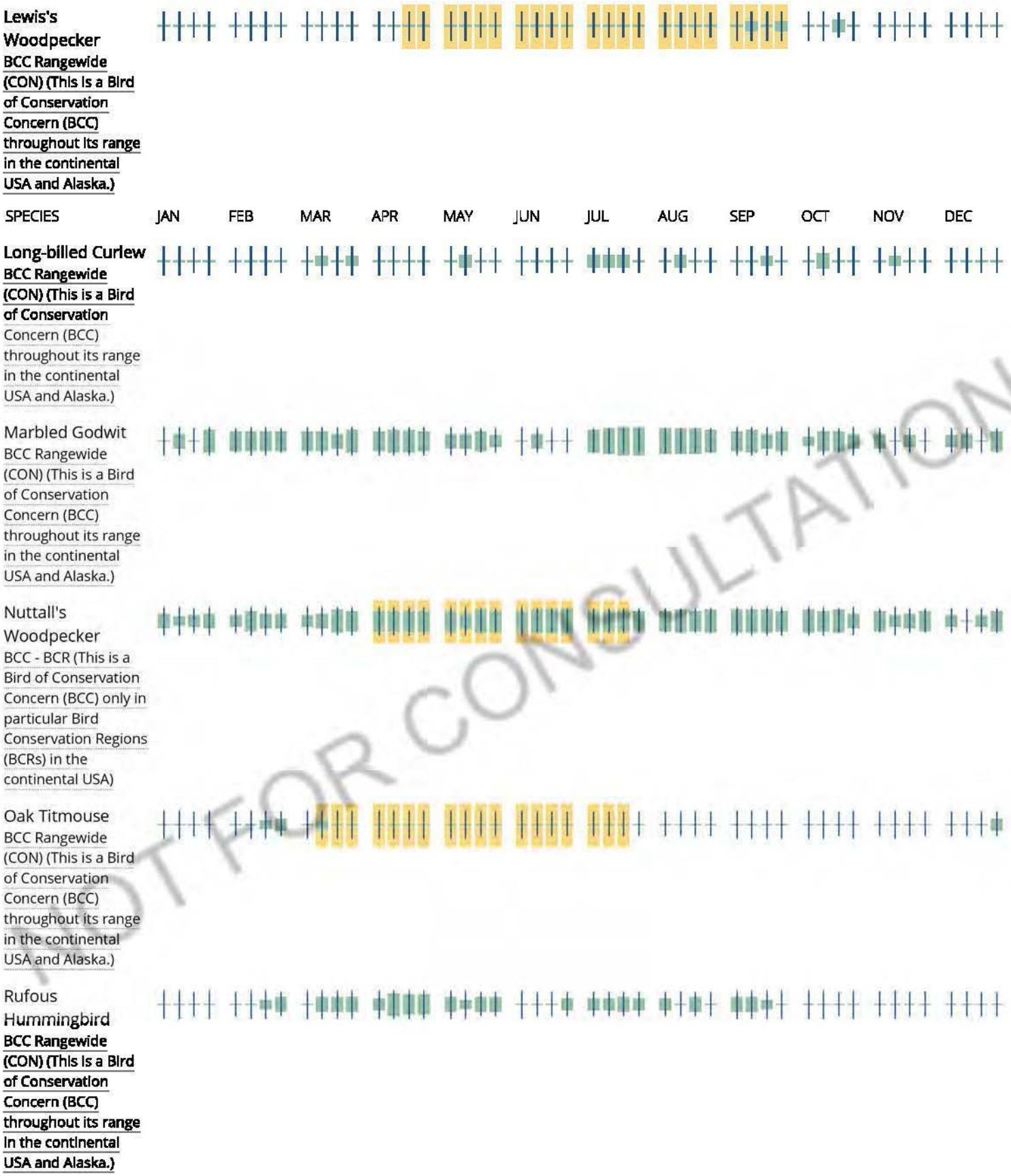


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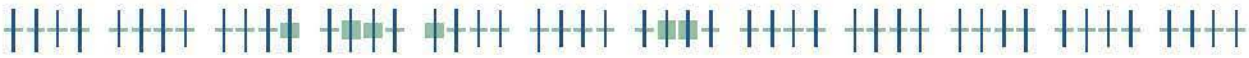
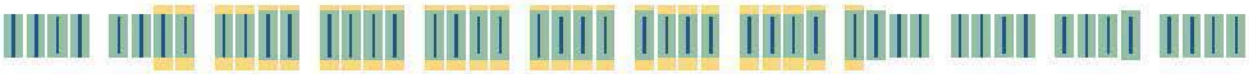
**Short-billed Dowitcher**
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



**Song Sparrow**
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

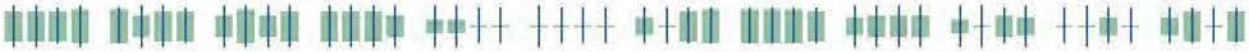


Spotted Towhee
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Tricolored Blackbird
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Whimbrel
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Willet
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



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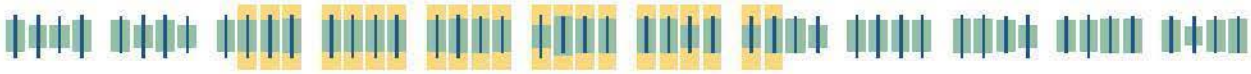
Wrentit
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental

USA and Alaska.)



**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures and/or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

**What does IPaC use to generate the migratory birds potentially occurring in my specified location?**

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the AKN Phenology Tool.

**What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets .

**Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.**

**How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?**

**To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: The Cornell Lab of Ornithology All About Birds Bird Guide,**

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or (if you are unsuccessful in locating the bird of interest there), the Cornell Lab of Ornithology Neotropical Birds guide. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

### What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

### Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a

NOT FOR CONSULTATION

red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

NOT FOR CONSULTATION

# APPENDIX C

# BIRDS OBSERVED AT WEST SUNSET PLAYGROUND, 2015 - PRESENT

Birds Observed at West Sunset Playground
Source: Ebird https://ebird.org/hotspot/L6317907?yr=all&m= Accessed July 20, 2020

| | Species Name | Count | Date |
|---|---|---|---|
| 1 | Killdeer | 1 | 30 Mar 2020 |
| 2 | Rock Pigeon | 6 | 18 Jan 2020 |
| 3 | Mourning Dove | 1 | 18 Jan 2020 |
| 4 | Anna's Hummingbird | 1 | 18 Jan 2020 |
| 5 | Western Gull | 6 | 18 Jan 2020 |
| 6 | Black Phoebe | 1 | 18 Jan 2020 |
| 7 | European Starling | 26 | 18 Jan 2020 |
| 8 | House Sparrow | 6 | 18 Jan 2020 |
| 9 | Tricolored Blackbird | 25 | 18 Jan 2020 |
| 10 | Brewer's Blackbird | 40 | 18 Jan 2020 |
| 11 | American Crow | 4 | 2 Jan 2020 |
| 12 | Common Raven | 2 | 2 Jan 2020 |
| 13 | Chestnut-backed Chickadee | 1 | 2 Jan 2020 |
| 14 | Ruby-crowned Kinglet | 1 | 2 Jan 2020 |
| 15 | Pygmy Nuthatch | 3 | 2 Jan 2020 |
| 16 | American Robin | 4 | 2 Jan 2020 |
| 17 | House Finch | 2 | 2 Jan 2020 |
| 18 | Dark-eyed Junco | 4 | 2 Jan 2020 |
| 19 | White-crowned Sparrow | 12 | 2 Jan 2020 |
| 20 | Yellow-rumped Warbler | 5 | 2 Jan 2020 |
| | blackbird sp. | 15 | 26 Nov 2019 |
| 21 | Eurasian Collared-Dove | 2 | 10 Nov 2019 |
| 22 | Brown-headed Cowbird | 2 | 10 Nov 2019 |
| 23 | Townsend's Warbler | 1 | 10 Nov 2019 |
| 24 | Red-necked Phalarope | 6 | 21 Aug 2019 |
| 25 | Lark Sparrow | 1 | 12 Aug 2019 |
| 26 | Turkey Vulture | 1 | 14 Apr 2019 |
| 27 | Peregrine Falcon | 1 | 14 Apr 2019 |
| 28 | Hooded Oriole | 1 | 31 Mar 2019 |
| 29 | Merlin | 1 | 28 Mar 2019 |
| 30 | Barn Owl | 1 | 21 Mar 2019 |
| 31 | Western Bluebird | 2 | 5 Feb 2019 |
| 32 | Red-tailed Hawk | 1 | 26 Jan 2019 |

| | Species Name | Count | Date |
|---|---|---|---|
| 33 | California Gull | 15 | 20 Jan 2019 |
| | Larus sp. | 30 | 20 Jan 2019 |
| 34 | Northern Flicker | 1 | 20 Jan 2019 |
| 35 | Say's Phoebe | 1 | 20 Jan 2019 |
| 36 | Bushtit | 16 | 20 Jan 2019 |
| | Zonotrichia sp. | 4 | 20 Jan 2019 |
| 37 | California Towhee | 1 | 20 Jan 2019 |
| 38 | Cooper's Hawk | 1 | 2 Jan 2019 |
| 39 | Lesser Goldfinch | 2 | 21 Oct 2018 |
| 40 | Yellow Warbler | 1 | 23 Sep 2018 |
| 41 | Osprey | 1 | 9 Sep 2018 |
| | shorebird sp. | 1 | 3 Sep 2018 |
| | warbler sp. (Parulidae sp.) | 2 | 3 Sep 2018 |
| 42 | Canada Goose | 11 | 26 Aug 2018 |
| 43 | Double-crested Cormorant | 2 | 26 Aug 2018 |
| 44 | White-tailed Kite | 1 | 5 Aug 2018 |
| 45 | American Goldfinch | 1 | 1 Apr 2018 |
| 46 | Tropical Kingbird | 1 | 31 Mar 2018 |
| 47 | Mallard | 3 | 27 Mar 2018 |
| 48 | Barn Swallow | 1 | 27 Mar 2018 |
| 49 | Red-shouldered Hawk | 1 | 26 Mar 2018 |
| 50 | Red-breasted Nuthatch | 2 | 18 Mar 2018 |
| 51 | Golden-crowned Sparrow | 2 | 18 Mar 2018 |
| 52 | Song Sparrow | 1 | 18 Mar 2018 |
| 53 | Spotted Towhee | 1 | 18 Mar 2018 |
| 54 | Red-winged Blackbird | 1 | 18 Mar 2018 |
| | gull sp. | 1 | 2 Mar 2018 |
| 55 | Pine Siskin | 2 | 25 Feb 2018 |
| 56 | Fox Sparrow | 1 | 25 Feb 2018 |
| 57 | Northern Pintail | 4 | 10 Dec 2017 |
| 58 | Glaucous-winged Gull | 1 | 10 Dec 2017 |
| | pigeon/dove sp. | 1 | 26 Nov 2017 |
| 59 | Orange-crowned Warbler | 1 | 26 Nov 2017 |
| 60 | Cedar Waxwing | 5 | 20 Nov 2017 |
| 61 | Downy Woodpecker | 1 | 11 Nov 2017 |
| 62 | Purple Finch | 1 | 11 Nov 2017 |

| | Species Name | Count | Date |
|---|---|---|---|
| 63 | American Pipit | 7 | 7 Oct 2017 |
| 64 | California Scrub-Jay | 2 | 2 Oct 2017 |
| 65 | Great Blue Heron | 1 | 10 Mar 2017 |
| 66 | Wilson's Snipe | 1 | 20 Nov 2016 |
| | peep sp. | 1 | 28 Aug 2016 |
| | passerine sp. | 2 | 28 Aug 2016 |
| 67 | Hermit Thrush | 1 | 19 Jan 2015 |

| | |
|---|---|
| **From:** | Gina Short |
| **To:** | Yee, Norman (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Mar, Gordon (BOS); Peskin, Aaron (BOS); Fewer, Sandra (BOS); Preston, Dean (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Thursday, October 1, 2020 12:43:33 PM |

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Dear President Norman Yee:

My name is Gina Short and my son is a sophomore at St. Ignatius. My husband and I have lived in San Francisco since 1993 and have lived in District 7 since 2007. My son, his teammates, his classmates all would benefit immensely from being able to use the field in the late afternoon/evening.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice. This would also help our family not having to drive to these places.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Gina V. Short
355 Casitas Ave, San Francisco, CA 94127

Email: gvshort@hotmail.com

| | |
|---|---|
| **From:** | BRIAN LYNCH |
| **To:** | Board of Supervisors, (BOS) |
| **Subject:** | Please Help Support Lights at St. Ignatius Field |
| **Date:** | Thursday, October 1, 2020 3:02:13 PM |

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10/01/20

President Norman Yee and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Yee and Board,

My wife Nathalie and I have been residents of San Francisco for 18 years. For the last 8 years we have been living in Forest Hill raising two daughters, both student athletes, in the city. Our oldest daughter is a student at St. Ignatius.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law. As you know, there are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically, but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

We truly appreciate you attention to this matter.

Sincerely,

Dr. Nathalie and Mr. Brian Lynch

315 Magellan Avenue

San Francisco CA 94116

| | |
|---|---|
| **From:** | Yvonne Toracca |
| **To:** | Yee, Norman (BOS); Stefani, Catherine (BOS); Peskin, Aaron (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at SI College Preparatory |
| **Date:** | Thursday, October 1, 2020 3:48:59 PM |

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October 1, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Catherine Stefani and Honorable Supervisors:

My name is Yvonne Toracca, I am a proud native San Franciscan living in the Marina and North Beach District(s) for the past 55+ years.

I am also a proud parent of 2 young adult children and one teenage daughter, Nina, a senior and Varsity Soccer player, who currently attends St. Ignatius College Preparatory.

We take great pride in our beloved city and are always looking for ways to promote and improve its desirability in order to maintain residents, especially young families! Sadly, we are continuously up against families leaving San Francisco many due to the lack of usable outdoor activity space.

That being said, we have all personally experienced the recent confinement due to COVID and the Northern California Fires and realize just how important it is for our young students and athletes  to get outside and exercise. It just never seems as if there is enough time. That's why it's so important for our City, neighbors and community members to help support one another.

I'm now writing in strong support for the approval of lights at St. Ignatius Field in order to create more options for students and student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Yvonne Toracca
3264 Lyon Street San Fancisco, CA 94123
yvonnetoracca@gmail.com

| | |
|---|---|
| **From:** | Mr. John Regalia |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Lights on St. Ignatius Field |
| **Date:** | Thursday, September 24, 2020 12:44:09 PM |

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President Norman Yee and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: File No. 200992 and 200996

Dear President Norman Yee and Members of the San Francisco Board of Supervisors:

My name is John Regalia and I am the head football coach and a teacher of Mathematics at St. Ignatius College Preparatory. I have been a coach and member of the St. Ignatius faculty for 23 years.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.

There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the campus rather than traveling great distances to practice. In addition to space, having lights will alleviate scheduling issues that extend student's schedules, taking time away from their studies and time at home. The lights help change schedules for students that promote student wellness and a healthier lifestyle for our students, teachers and coaches.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and get good grades but to be in service to others. Many of those lessons are learned through the shared experience on the field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

John Regalia

Head Football Coach, St. Ignatius College Preparatory
2001 37th Avenue, San Francisco, CA 94116 | www.siprep.org | (415) 731-7500 x. 453

| | |
|---|---|
| **From:** | Jeff Isaacs |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 (Please Vote Yes!) |
| **Date:** | Thursday, September 24, 2020 12:51:16 PM |

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Dear Supervisor Mandelman and Honorable Supervisors,

I was born and raised in Glen Park and have lived there almost my entire life (40+ years). One of the things I always appreciated was Glen Park and its fields where we were able to play sports. Luckily for me I grew up within walking distance, just a few blocks from the park, but many in the City do not have such an opportunity so close to their homes or schools. I know the Board of Supervisors has worked very hard to make the park I grew up playing in better, and my hope is that you will do the same for my High School, St. Ignatius College Preparatory.

I'm writing in the hope that you will approve of the lights at St. Ignatius Field. This will give students that do not live close to a park a place to practice at school, and will also allow S.I. to have a later start time. It has become harder for kids to practice sports in open fields in SF and allowing these lights will keeps kids safe near their own campus rather than having them travel long distances just to practice.

St. Ignatius is a place that demands excellence from, and promotes excellence for, its students. I received an excellent education there, both academically as well as learning how to be a "person for others" as we called it, which included service to the community and to one another. I have many friends who formed lifelong bonds on the sports field as well as in the stands, and those bonds are important not only to them as people, but also contribute to the feeling of togetherness and the shared bonds of community that sometimes feel strained in SF, especially lately.

The San Francisco Planning Commission voted 6 to 1 in favor of this

approval back in July and the process has been ongoing for over seven long years. Please consider the young students whose lives will be improved by the addition of the lights to our field sports program and the impacts it will have on the positive development of thier lives.

Please vote YES! to the lights at St. Ignatius Field, and thank you for your consideration.

Sincerely,

Jeff Isaacs
Class of 1994

| | |
|---|---|
| **From:** | Barbara Manzanares |
| **To:** | Safai, Ahsha (BOS); Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Re: Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Thursday, September 24, 2020 5:18:55 PM |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Dear Supervisor Safai and Honorable Supervisors:

I am the mother of three St. Ignatius College Preparatory graduates. I am a native San Franciscan growing up in the Ingleside Terrace neighborhood and currently live in the Crocker Amazon neighborhood where I raised my three boys and have lived for the past 36 years. St. Ignatius athletics played a significant role in my sons' success as SI students and their continued education at the college level. As a single widowed mother of highschool aged boys, I recognized the influence a strong athletic program with proper safe facilities can have on a young student athlete.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others.

Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Barbara Manzanares
287 South Hill Blvd
San Francisco, Ca 94112
BManzanares13@gmail.com

| | |
|---|---|
| **From:** | Jack Lum |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Thursday, September 24, 2020 5:42:31 PM |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: File No. 200992 and 200996

Dear Commissioners and Supervisors:

I am Pastor Jack Lum and have lived in the Sunset District since January of 2011. I am the father of two St. Ignatius students (son class of 2019 and daughter class of 2023).

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law. There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the campus rather than traveling great distances to practice.

I also feel that with the current uncertainty of school schedules, the lights give more options for flexible class and athletic scheduling.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and get good grades but to be in service to others. Many of those lessons are learned through the shared experience on the field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Jack Lum
2435 30th Ave, 94116
jacktlum@gmail.com

| | |
|---|---|
| **From:** | Tita Bell |
| **To:** | Board of Supervisors, (BOS) |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Mandelman, Rafael (BOS) |
| **Subject:** | Please AFFIRM SI Lights (File No. F200992 and 20099) |
| **Date:** | Thursday, September 24, 2020 5:53:12 PM |

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24 September 2020

President Norman Yee &
The Members of San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244

San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 20099

Honorable Supervisors:

We are parents of two Saint Ignatius students and 21-year residents of San Francisco. We write to urge you to affirm the approval of proposed lights at Saint Ignatius's JB Murphy Field.

Sports are crucial to the health and development of kids -- physically and emotionally. After what we have all been through with the pandemic, kids need physical activity more than ever. When things finally reopen, San Francisco kids will need the support from the city government and community so they can resume active, vibrant lives. One of those ways is facilitating sports practices and events.

Installing lights at JB Murphy Field would greatly improve the ability of SI student athletes to dive back into sports practices. There are increasingly fewer practice fields available to students. If SI students could practice on their home field versus competing with other school teams for space to public fields with lights, that would open up space for other schools to hold their practices. The other benefit is that SI students can make good use of their time by staying on campus rather than having to travel great distances to various fields. They can then get home earlier and get to their homework sooner.

Our city has been through a lot this year.  San Francisco's young people have been resilient and by and large respectful of the public health restrictions for the sake of more vulnerable populations. As San Francisco reopens, the kids deserve our support to the fullest extent possible. We are not privy to the grounds for the public appeal (objection) but we would just ask that the appellant (and the City) consider what the compassionate response should be under the circumstances, what result is fair and beneficial to our city and in particular our next generation.

Please AFFIRM the SF Planning Commission's 6 to 1 vote in favor of these lights.

Thank you,
Tita & Brian Bell
3719 22nd Street
San Francisco CA 94114

| | |
|---|---|
| **From:** | Michael Bolcerek |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Re: Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Thursday, September 24, 2020 6:55:37 PM |

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September 24, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Dear Supervisor Stefani and Honorable Supervisors:

My family has lived in San Francisco for over 25 years in the Marina District and Cow Hollow. As you know, Aaron and Summer Bolcerek went to school with your children at SVDP and Summer was lucky to have interned in your office after graduating from Sacred Hearth Cathedral, we share great experiences together, I also had the opportunity to coach your son Dom, at soccer which was a pleasure that I have shared previously.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law. With COVID-19, it looks as if a number of sports will unfortunately simultaneously play in the Spring season. Soccer, field hockey, lacrosse will all be played at the same time and with spring club soccer and lacrosse in the city it will be almost impossible for these high school players to practice. Having coached youth soccer in the city for years and the fact that my son Aaron is playing soccer in his junior season at SI, the time under lights in the spring will allow for proper training time to keep him and his teammates from injury. Accordingly I hope that the Board of Supervisors will look favorably on supporting the Planning Commission's vote.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Michael Bolcerek
1280 Lendrum Ct. Apt. B

San Francisco, CA 94129
bolcerek@gmail.com

| | |
|---|---|
| **From:** | Christine Gardner |
| **To:** | Stefani, Catherine (BOS); Yee, Norman (BOS); Haney, Matt (BOS); Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Thursday, September 24, 2020 9:40:32 PM |

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September 24, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244

San Francisco, CA 94102-4689

Dear Supervisor Stefani - I have been a resident of District 2 for almost 30 years and have had the great opportunity to not only live here as a young professional, but also raise our three kids in San Francisco. I also served on the Boards of the San Francisco Parks Trust and the San Francisco Parks Alliance for more than a decade during which I helped to raise millions of dollars for projects that benefit our entire community, including sports fields and playground renovations in every zip code of SF.

I was a strong proponent of the Beach Chalet field renovation and I attended the City Hall hearings which were held for years about how to make that project work for athletes (children and adults), as well as neighbors and environmental constituents who felt strongly about how to serve the goals for maximum use with the least possible disruption to the neighboring community or local habitat. I know that the lights were a barrier that had to be addressed. Those concerns were resolved and the Beach Chalet has become a shining example of San Francisco creating a safe and accessible athletic venue for all ages to access and enjoy, well beyond sunset.

I know very well that there are fewer and fewer spaces for students to practice field sports in San Francisco. As the mother of 3 athletes who play a multitude of sports, I have spent the last ten years criss-crossing the City and its environs just to find practice fields, often ending up in Marin, Treasure Island, Pacifica or farther South on the Peninsula. That driving is exhausting for kids, time-consuming for families and environmentally detrimental.

SI, where my youngest son is now a Freshman, is an institution in this City that has built a strong commitment to athletics, in addition to academics and spiritual growth. My older son was lucky enough to be a multi-sport athlete at the school and is now playing football at UCLA. He could not have accomplished that goal without the

amazing facility that SI offers its athletes.  We have all invested in further upgrading this field and facility to expand its utility to as many of our kids as possible - including Summer camps and weekend programs such as Flag Football.

This field is a game-changer for the large community that is SI, but also for all who come to participate as spectators and guest athletes, striving to be their best.  In July, the San Francisco Planning Commission voted 6-1 in favor of the lights a SI's JB Murphy Field.  These lights will enable teams to increase study time, decrease the stress of traffic and alleviate the wear and tear of 100's of kids and their families who want to pursue sports at their high school.  Imagine all the young drivers we could keep off the road and put in the library while waiting for a later practice, rather than driving themselves to and from a field outside the City on a dark, foggy night.....

Thank you for your consideration and for putting our kids first.  I hope you will vote YES to the lights at St. Ignatius Field.

Sincerely,

Christine Gardner

Christine Gardner
2261 Jackson
SF  94115

| | |
|---|---|
| **From:** | Laura Kelly |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | VOTE YES Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Thursday, September 24, 2020 9:42:49 PM |

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Honorable Supervisors:

Our names are Laura, Bill, Julia, Kaitlin and Tyler Kelly. All five of us were born in San Francisco and we currently live in San Francisco. We have strong ties to St. Ignatius (family graduates include Bill's father, my two brothers and Bill's and my two daughters while our son is a current student). We are a family who enjoys an outing together and our favorite involves sports. We believe many San Francisco residents would enjoy a Friday or Saturday night at a football game. It's good, clean fun for both players and spectators as it supports physical health, teamwork, school spirit and community camaraderie.

I'm writing to ask you to vote YES to approve lights and also to allow St. Ignatius to implement a later start time in accordance with CA State law. I'm sure you are aware that the San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years.

In addition, as you know, there are fewer and fewer spaces for athletes in San Francisco. Allowing SI to install these lights will allow more San Francisco residents to participate in sports. This is a win-win for everyone.

Please vote YES. Thank you for your time and consideration.

Sincerely,

Laura Kelly

| | |
|---|---|
| **From:** | Martha Shaughnessy |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Lights at St. Ignatius College Preparatory |
| **Date:** | Friday, September 25, 2020 11:29:05 AM |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: File No. 200992 and 200996

Dear Board of Supervisors -

My name is Martha Shaughnessy Convery, a lifetime resident of San Francisco, with both my childhood home and the home in which I am currently raising my children located in District 4. I am a founding member of Women's March SF and have had the pleasure of working with many of you in that capacity.

I am also a third generation Ignatian, having graduated within the first five years of coeducation at St. Ignatius College Preparatory.

My father, Michael Shaughnessy, retired last year after 40 years as a teacher and spiritual leader of generations of men and women who learned to serve others as part of their Jesuit education.

I am writing in strong support for approval of lights at St. Ignatius Field.

I grew up watching S.I. sports - both on this field and at Kezar among other more distant locales, and was a student athlete throughout my schooling - a Lakeshore Leopard who played on a traveling kickball team, a Giannini Jaguar who - with my sister - brought girls to the soccer team for the first time in the school's history, at S.I. and then at Cornell.

I've also played soccer on every field in the greater Bay Area, as a child and as an adult, up until my second child was born in 2014.

Adding lights to fields throughout The City has been a great boon - with Crocker Amazon and Beach Chalet being two more recent examples. Doing so at St. Ignatius will not only allow for later start times in accordance with CA State law, it will also give more equitable access to field time across sports, levels and between genders.

Having more consistent and extended access to our own field will also take St. Ignatius out of the competition for limited field space/time at Park & Rec fields that are already in greater demand than they can serve.

The Jesuit teachings of St. Ignatius College Prep run bone deep in me, and is teaching for which I will be forever grateful, and which serve the greater city in my role as a small business owner, a founding member of Women's March San Francisco, and a community organizer.

Along with what I learned on my father's proverbial knee and in the classroom, my time spent in service to my teammates is as instrumental as any in forming lifelong bonds to the community that raised me up.

Please vote YES! to the lights at St. Ignatius field and thank you for your consideration.

Sincerely,

Martha Shaughnessy Convery

2431 26th Avenue
martha@thekeypr. com
415-987-0285

Martha Shaughnessy
she/her/hers
E: martha@thekeypr.com
C: 415-987-0285

Sent via Superhuman

| | |
|---|---|
| **From:** | branham liz |
| **To:** | Stefani, Catherine (BOS) |
| **Cc:** | Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Friday, September 25, 2020 4:06:53 PM |

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Hi Catherine,

Hope you and the family are staying well. It has been quite the year...to say the least.

Exciting that SVdP has been approved to go back to in person learning. I sure hope that SHC and SI and all the other high schools are not far behind. It is so tough on these kids (and everyone else no doubt)...

Speaking of SI, I am writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please please please vote **YES** to the lights at St. Ignatius Field!! Thank you so much Catherine, take good care and hope to see you all soon,

Liz and Eryc

**From:** hdo30@yahoo.com
**To:** Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS)
**Subject:** Re: Lights at St. Ignatius Field File No. F200992 and 200996
**Date:** Friday, September 25, 2020 4:19:04 PM

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9/25/20

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Norman Yee and Honorable Supervisors:

My name is Hoang Leung and I currently live in West Portal and have lived in San Francisco since 2002. I have two kids born and raised in San Francisco that are students at Starr King.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Hoang Leung
339 West Portal Ave
Hdo30@yahoo.com

| | |
|---|---|
| **From:** | Gareth Kay |
| **To:** | MandelmanStaff, [BOS] |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Friday, September 25, 2020 4:28:40 PM |

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September 25, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Mandelman:

I'm Gareth Kay. We were lucky enough to move to San Francisco in 2009 and are grateful for the environment it has created for my family. I own a small marketing consultancy business in the Mission district and my wife Clare works for the SFUSD at McKinley Elementary. Our daughter Esme is a 7th grader at Everett Middle School and a keen musician and soccer player.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Gareth Kay
336 Gold Mine Drive, San Francisco CA 94131
garethkay@gmail.com

| | |
|---|---|
| **From:** | Sonia Pasquali |
| **To:** | MandelmanStaff, [BOS] |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field, File No. F200992 and 200996 |
| **Date:** | Friday, September 25, 2020 4:42:28 PM |

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September 25, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689
Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Mandelman and Members of the Board of Supervisors:
I am a long time San Francisco resident (past 25 years), living in the district that is currently under your supervision for the past 15. I am a working mom, parent to two school-aged boys who attend public schools and play competitive soccer. I know how hard it is for schools and sports organizations in the city to find lighted fields for practices and games as the days grow shorter and daylight savings ends. There are many evenings when I've stood on the sidelines in the dark, waiting for my boys as we lost daylight and practices were cut short because they were barely able to see the ball.

Thus, I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law. There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice, as well as free up shared fields for others to practice.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to the SI field sports program and the impacts it will have on the positive development of our youth.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,
Sonia Pasquali
782 14th Street, SF CA 94114
soniap@email.com

| | |
|---|---|
| **From:** | Jennifer Mendoza |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | File No. 200992 and 200996 |
| **Date:** | Friday, September 25, 2020 4:47:06 PM |

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Dear San Francisco Board of Supervisors,

My name is Jennifer Mendoza, I was born and raised in the Sunset for the past 44 years. I graduated from St. Ignatius in 1994. I have 2 children in elementary and middle school and they love going by mom's high school and would love to one day attend SI.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.

There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and get good grades but to be in service to others. Many of those lessons are learned through the shared experience on the field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,
Jennifer Mendoza
1408 38th Avenue, SF 94122
jenn.mendoza@gmail.com

**From:** Rebecca Archer
**To:** Safai, Ahsha (BOS)
**Cc:** Board of Supervisors, (BOS)
**Date:** Friday, September 25, 2020 6:56:55 PM

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Safai:

I am a single parent, a county attorney (County of San Mateo) and a12 year resident of District 11. My son is an avid soccer player and being able to play soccer throughout the pandemic has made the difference between sanity and depression for him. He does not attend SI but is on a team that is able to use the SI fields. I am well aware of the decision making process the BOS undergoes for each request. NIMBYism is ubiquitous. However, sometimes we have to do things that help our community as a whole.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes during the pandemic and into the future.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will allow students and the community to travel less for sports. I fully expect SI will open their fields to the community in exchange for this privilege so that we can increase equity in the City as well.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the community and athletes who will be impacted by this addition to the City's resources for field sports and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Rebecca Archer

21 Theresa Street

rebeccaarcher@gmail.com

| | |
|---|---|
| **From:** | Kristyn Gherardi Bassi |
| **To:** | Stefani, Catherine (BOS) |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Support for Lights at St. Ignatius Field [File No. F200992 and 200996] |
| **Date:** | Friday, September 25, 2020 8:54:39 PM |

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9/25/2020

Dear Supervisor Catherine Stefani,

My name is Kristyn Bassi. I'm a 34 year old San Francisco resident and St Ignatius Alumni. My husband (also an SF native/SI grad) and I have lived in District 2 for 10 years. We have two young children. My husband sells residential real estate here in The City and I am a stay-at-home mom and Biotech consultant.

My husband and I were both multi-sport high school athletes who went on to play collegiate lacrosse. We put in our hours on the St. Ignatius athletic fields and I'm writing in strong support for approval of lights at SI Field in order to create more options for student athletes and also to allow SI to implement a later start time in accordance to CA State law.

There are fewer and fewer SAFE spaces for students to practice field sports in San Francisco and allowing S.I. to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and discussions surrounding this project have been underway since I was in high school 16 years ago!! Please consider the generations of students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Kristyn Bassi
161 28th Ave, SF 94121
kgherardi@gmail.com

**From:** janice kellogg
**To:** MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS); Mar, Gordon (BOS); Mar, Gordon (BOS); Yee, Norman (BOS); Haney, Matt (BOS)
**Subject:** Lights at St. Ignatius Field File No. F200992 and 200996
**Date:** Saturday, September 26, 2020 11:28:50 AM

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Dear Supervisor Mar and Board of Supervisors:

I appreciate the opportunity to express my support of the proposed lighting project for the St. Ignatius stadium. I am a neighbor. I live on Ulloa near Sunset, and my daughter and family live at 43rd and Wawona. We moved to the Sunset deliberately to be close to SI to support my granddaughter who is a dedicated student athlete.

It was my understanding that this issue was previously negotiated and overwhelmingly approved after giving serious consideration to neighborhood impact. Some neighbors presented their concerns about traffic, noise, light post eye sores, parking, litter, support of a contact sport (football), and alcohol consumption. It seems to me that these concerns are really not changed because of the few extended hours of use that the lights would allow. These are normal concerns that neighbors of schools often deal with and express. If anything, it just slides the issues to a few hours later. Some mentioned concerns about disruptive sleep cycles, which seems a bit of a reach to me. . . . drapes closed, if necessary?

As I see it, it comes down (in my opinion) to a FEW local neighbors "suffering" added light on their block in exchange for the added benefits to MANY. Isn't that what we have to balance as we live together in community? Decisions that affect the greater good is our goal. SI has been a high school in the neighborhood for many years without a change in their primary operations and contributes much in addition to the vibrant youthful energy it brings to our hood. More than football will benefit from the lights. Girls' and boys' soccer, track, lacrosse, and other outdoor activities would be able to use the field in the early evening. In this time of Covid 19, having more outdoor options is a good thing.

There is one positive outcome that is not discussed by many but is really important to me. Having the lights would provide the opportunity for the community and working parents to attend evening games. Being able to show support as neighborhood spectators and families, as our student athletes demonstrate their talents, would be a wonderful experience for all.

The health and social benefits of competitive sports seems obvious to me:
-decreased obesity and diabetes
-improved cardiovascular and pulmonary function
-lower rates of drug, alcohol, vaping, and cigarette use among athletes
-increased success in the classroom
-develop leadership, teamwork, determination and persistence

I am strongly in favor of the stadium lights at SI and anything we can do to encourage and elevate athletics and positive opportunities for good clean fun in our neighborhood. I'd like to encourage

our neighbors to "lighten up" and have some fun watching these dedicated student athletes under the lights.

**Janice B Kellogg**
**3432 Ulloa Street**
**San Francisco, CA 94116**

**mobile 415 699 4499**
**email: jbkdirect@hotmail.com**

**From:** Jo Southern
**To:** Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Yee, Norman (BOS)
**Subject:** Lights at St. Ignatius Field File No. F200992 and 200996
**Date:** Saturday, September 26, 2020 11:42:57 AM

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**President Norman Yee and Members of the San Francisco Board of Supervisors**

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

26th September 2020

Dear President Norman Yee and Members of the San Francisco Board of Supervisors,

My name is Johanna Southern and I live with my family in Mill Valley. Although our local Supervisor is Kate Sears, my daughter, Isabelle, attends St Ignatius Preparatory School in San Francisco and loves the school. She is a Junior and a very enthusiastic soccer player.

I know we don't live in the area of St. Ignatius and I understand that this clearly makes it so much easier for us to make this request and offer our support to the school compared to those residents in the immediate vicinity of the school field, however, I am writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory is an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the

students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Johanna Southern

| | |
|---|---|
| **From:** | Collin Quock |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field |
| **Date:** | Saturday, September 26, 2020 11:47:54 AM |

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President Norman Yee and Members of the San Francisco Board of Supervisors
City Hall
One Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

RE: Lights at St. Ignatius Field File No. F200992 and 200996

Dear President Yee and Honorable Supervisors:

My name is Collin P. Quock. I am a retired cardiologist and 80-year resident of San Francisco, the last 38 being in District 7.
I am an alumnus, father and grandfather of students at St. Ignatius College Preparatory. I am also a past member of its Board of Regents.

I write in vigorous support for your approval of lights at St. Ignatius Field to allow students later hours in field athletics without traveling off-campus.

St. Ignatius has been an excellent center of learning not only academics but life lessons as well, many of which are taught on the sports field.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July as part of a process which thus far has taken seven years.
Please consider the generations of our students who will benefit from this addition to our athletic program and the impact it will have on their lives and our City.

Please vote "Yes" for the lights at St. Ignatius Field.

Thank you for your consideration.

Very sincerely yours,

/s/ Collin P. Quock, MD
140 Casitas Avenue
San Francisco, CA 94127
cpquock@yahoo.com

| | |
|---|---|
| **From:** | Jason Monberg |
| **To:** | MandelmanStaff, [BOS] |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS); nharlan@siprep.org; Joe Dugan; Karli Sager |
| **Subject:** | Re: Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Saturday, September 26, 2020 1:57:21 PM |

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September 26, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Dear Supervisor Mandelman and Honorable Supervisors,

I am a Bay Area native and have lived in San Francisco for 26 years, 24 of those in District 8. I have started and run two businesses in San Francisco which, combined, employ over 100 people and generate over $25 million in gross receipts annually. I am currently raising 3 children who are student athletes attending a mix of public and private schools in San Francisco. My family and I have committed to San Francisco in so many ways because we believe it is a world class city that is setting positive trends for the rest of our country.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Jason Monberg
542 Valley St.
San Francisco, CA 94131
jasonmonberg@gmail.com

| | |
|---|---|
| **From:** | joseph mcfadden |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Re: File No. 200992 and 200996 |
| **Date:** | Saturday, September 26, 2020 2:15:28 PM |

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Dear Supervisors:

My name is Joseph McFadden, and I'm an Alumnus of St. Ignatius College Preparatory, as well as the Alumni Class Representative for the Class of 1981 and a parent of two SI graduates. I'm also a resident of the Sunset District and a native San Franciscan.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.

There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the campus rather than traveling great distances to practice. If the field lights were in place during my time at S.I., I would have benefitted from them in so many ways, which is why I strongly support the approval of this project.

As a member of the football and soccer teams during my time at Saint Ignatius I used the fields regularly. I spent countless nights on the field and believe strongly that adding necessary lights would only enhance the experience of students who currently attend the college preparatory. It is also a safety issue for students these days. As a recently retired member of the San Francisco Police Department, after a 30 year career, I can tell that the addition of lights to the field would make not only the students feel safe, but also the surrounding neighbors. People of ill intent would be less likely to attempt crimes in a well-lighted area. Both my son and my daughter attended SI and I would have felt much more comfort as a parent knowing that the area was well lit. All of the St. Ignatius students, staff and the neighbors would feel more comfortable with lighting at night if you approve this project. As a former Captain of the Ingleside District I know that safety is a concern for all members of our communities and by your approval of the lights, this would provide a much needed feeling of security to the sunset residents, students and staff at Saint Ignatius.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and get good grades but to be in service to others. Many of those lessons are learned through the shared experience on the field. Even the students who participate as spectators gain a

strong feeling of community by supporting their friends and fellow classmates.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Joseph McFadden
2655 22nd Avenue
San Francisco, CA 94116

| | |
|---|---|
| **From:** | guo ning huang |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | File NO. 200992 and 200996 Lights at St. Ignatius Field |
| **Date:** | Saturday, September 26, 2020 5:36:29 PM |

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Hello President Norman Yee

and Member of the San Francisco Board of Supervisors

I am Eric Huang, I have been living in the Sunset district/San Francisco for more than 20 years. I am a parent of a student who is currently attending St. Ignatius.

I'm writing in strong support for approval for lights at St. Ignatius Field in order to create more options for later school start time as required by new CA State Law signed by Governor Newsom. Research studies by the American Academy of Pediatrics have confirmed starting school later in the morning leads to better overall health and school performance. This will be the new normal for most California schools. Another key benefit of the field lights will be allowing kids a safe option to participate in community building Friday night athletic games. These will be on the campus with supervision by faculty, parents and school security to make sure the kids are in a safe and organized event. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates. Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Eric Huang

1363 26th Ave, San Francisco email: ejhuang11@gmail.com

| | |
|---|---|
| **From:** | Beth Mitchner |
| **To:** | Preston, Dean (BOS) |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at SI Field |
| **Date:** | Saturday, September 26, 2020 6:52:15 PM |

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September 26, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Preston:

My name is Beth Mitchner. My family and I have lived in the Inner Sunset for 20 years. My husband Doug Wertheimer and I, have raised our three sons (currently ages 23, 19 and 16) here. All of our boys have enjoyed years of playing sports on SF fields.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Beth Mitchner

1376 6th Avenue
San Francisco, CA  94122
bmitchner@me.com

| | |
|---|---|
| **From:** | nmurphy671@aol.com |
| **To:** | Board of Supervisors, (BOS) |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Sunday, September 27, 2020 10:35:39 AM |

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Hello,
As a resident on 39th Ave at Rivera for the past 25 years, we strongly oppose the installation of light towers at St. Ignatius HS. It is bad enough to have to endure the traffic during regular school activities during the week and on weekends during the day and now if the lights are installed at 90 feet, the evenings will be filled with unwanted lights, more traffic, more noise, more trash. The high school has managed to use portable lights when needed, and this has not caused many issues because the nights scheduled were limited.

Thanks,
Pat and Nancy Murphy

| | |
|---|---|
| **From:** | Grace Hawthorne |
| **To:** | Board of Supervisors, (BOS) |
| **Cc:** | nharlan@siprep.org |
| **Subject:** | SI field lights |
| **Date:** | Sunday, September 27, 2020 12:22:58 PM |

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Dear Honorable Supervisors

I am writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA state law.

There are fewer and fewer spaces for student to practice field sports in SF and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice. As a parent of a lower classman, the safety of being remain on campus for practice and game versus needing to travel off campus in a vehicle is enormous.

St. Ignatius College Preparatory has been an excellent center of learning on both the academic front as well as the citizen/community front. Many lessons and inquiry of how to serve others is learned and developed through shared experiences in a school stadium, on and off the field, where community is built and emotional bonds are formed.

The SF Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be positively impacted by this addition to our field sports program and the wider school community.

Please vote YES to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely
Grace
SI Mom of ’21 and ’23

*//////////*
**Grace Hawthorne**
Founder/CEO, Paper Punk
Adjunct Professor, Stanford d.school
M  415.259.9966

| | |
|---|---|
| **From:** | Musetta So |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | SI Lights Decision Goes to the Board of Supervisors |
| **Date:** | Sunday, September 27, 2020 5:48:36 PM |

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Dear Board of Supervisors,

I am writing to urge you to support the St. Ignatius lights at JB Murphy Field. It is critical for our kids (as an SF native and alum I can attest to this) and their development through sports.

Thank you for your time and consideration,
Musetta So

Sent from my iPhone

| | |
|---|---|
| **From:** | Ms. Jan Mullen |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No F200992 and 200996 |
| **Date:** | Sunday, September 27, 2020 6:38:32 PM |

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September 27, 2020

President Norman Yee and Members of the San Francisco Board of Supervisors,

My name is Jan Mullen and I am a proud 4th generation San Franciscan. I have been a teacher and coach at St. Ignatius College Preparatory for 30 years.

I am writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student-athletes and also to allow St. Ignatius to implement a later school start time in accordance with California State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than travelling great distances for practices and games.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically, but to be in service to others. Many of these lessons are learned through the shared experience on the sports field. Even students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote **YES** to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Jan Mullen

--

Jan Mullen
Wellness 9 Faculty
Girls' Soccer Coach

St. Ignatius College Preparatory
2001 - 37th Avenue
San Francisco, CA 94116

(415)731-7500 (x5490)
www.siprep.org

| | |
|---|---|
| **From:** | Michael Hughes |
| **To:** | Fewer, Sandra (BOS) |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Sunday, September 27, 2020 8:25:25 PM |
| **Attachments:** | image001.png<br>image002.png |

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September 27, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Fewer and Honorable Supervisors:

We are a family of three with a 13 year old son (hopefully) about to enter Saint Ignatius. My son is an athlete before all else but he still gets straight A's at Saint Vincent de Paul because he knows his success in sports is related to his success in academics. We have lived in The Richmond District for 35 years, and I was born down the peninsula in Redwood City and my wife was born in Brazil. We love the city and want to make it as family-positive as possible as that is what a community is if you think about it; families helping families, even if you're a family of one.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be

impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Michael B Hughes
7627 Geary Blvd, SF, CA 94121
mikebhughes@mkainc.com

**Construction Consultants & Engineers**

www.mkainc.com

**Michael B. Hughes, PE**

**Madsen, Kneppers & Associates, Inc.**
100 Pringle Avenue, Suite 340
Walnut Creek, CA 94596

**O** 925.934.3235 | **C** 415.819.6148 | **F** 925.934.3894 |
mhughes@mkainc.com

California Contractor License: 1002821

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| | |
|---|---|
| **From:** | John Manning |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Please let SI put lights in! |
| **Date:** | Monday, September 28, 2020 9:15:37 AM |

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I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing S.I. to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the generations of students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

johnpmanning@yahoo.com
415.317.2217

| | |
|---|---|
| **From:** | Kate Ripple |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Re: Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Monday, September 28, 2020 9:42:47 AM |

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President Norman Yee and Members of the San Francisco Board of Supervisors

City Hall

1 Dr. Carlton B. Goodlett Place, Room 244

San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Board of Supervisors:

I am a parent of a sophomore student-athlete (my daughter plays 2 sports) at St. Ignatius College Prep and playing athletics is a very important aspect of my daughter's high school experience, both physically and mentally. I am writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student-athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically, but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Kate Ripple
kateripple@comcast.net

| | |
|---|---|
| **From:** | Chelsea Bucoy |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Please Vote YES: Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Monday, September 28, 2020 9:57:59 AM |

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September 28, 2020
President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear President Norman Yee and Honorable Supervisors:

As a District 7 resident, and parent of a St. Ignatius student and athlete, I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

Team sports not only show positive effects on teen mental health, but also provide opportunities to play side-by-side with a diverse group of kids to create an inclusive environment for all. Now more than ever is a critical time to expand availability of fields through the approval of lights at St. Ignatius Field.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.
Sincerely,

Chelsea Bucoy
366 Claremont Blvd
San Francisco, CA 94127
cmbucoy@gmail.com

| | |
|---|---|
| **From:** | Tony Passanisi |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field file No. F200992 and 200996 |
| **Date:** | Monday, September 28, 2020 10:51:14 AM |
| **Importance:** | High |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Yee and Honorable Supervisors:

I have been a student athlete, parent, mentor and life member of the Father's Club of St. Ignatius College Preparatory. I have lived and worked in San Francisco my entire life. I am in District 7 in Miraloma Park in San Francisco. I have also been a small business owner in San Francisco for the past 32 years.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing S.I. to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the generations of students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Anthony J. Passanisi
115 Teresita Blvd
San Francisco, CA 94122

passinvest@msn.com

**From:** Yvonne Milham
**To:** Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS)
**Subject:** Lights at St. Ignatius Field File No. F200992 and 200996
**Date:** Monday, September 28, 2020 11:02:59 AM

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September 28th, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Yee and Honorable Supervisors:

My name is Yvonne Milham. I have been a San Francisco resident for the past 16 years. We moved to the city from Marin when I was pregnant with my first daughter (who now attends Saint Ignatius). In addition to being a parent of two children I am also a Licensed Marriage and Family Therapist. I focus exclusively on adolescent mental health. I run a high school wellness center and one of my go-to interventions for students who are struggling is physical activity.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law. In addition to the later start time being good for mental health, lights on the fields will enable students to practice and play even during daylight savings time. This will have a positive impact on so many students both mentally and physically.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July

and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives. In this time when adolescent mental health is more at risk than ever before, we need to make choices that positively impact this age group.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Yvonne Milham

906 Teresita Blvd. SF, CA 94127 (District 7)

ymilham@gmail.com

| | |
|---|---|
| **From:** | Mr. Ricky Matthews |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Re: Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Monday, September 28, 2020 11:35:12 AM |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Honorable Supervisors:

My name is Ricky Matthews and I am a seventh generation San Franciscan. I am an alumnus of St. Ignatius College Preparatory and currently serve as a teacher there. I was a multi-sport athlete at SI, and now I am a track and field coach. I know firsthand the benefits that lights would have for the student population here.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Ricky Matthews
2206 35th Ave.
San Francisco CA 94116

| | |
|---|---|
| **From:** | William McDonnell |
| **To:** | Stefani, Catherine (BOS) |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No F200992 and 200996 |
| **Date:** | Monday, September 28, 2020 11:39:37 AM |
| **Attachments:** | Letter to Stefani.docx |

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

Dear Supervisor Stefani,

Attached is a letter in support of the San Francisco Planning Commission approval of lights at St. Ignatius Field.

Thank you for your consideration.

Bill McDonnell
234 32nd Avenue
San Francisco, CA 94121

September 28, 2020

Supervisor Catherine Stefani
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Stefani:

I was born and raised in San Francisco and a graduate of St. Ignatius College Prep. I have lived in District 2 for over 30 years. My two daughters, both student athletes, graduated from St. Ignatius. I am an attorney for a small financial services business in downtown San Francisco.

I am writing in strong support for approval of lights at St. Ignatius Field to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with California state law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing S.I. to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the generations of students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Bill McDonnell
234 32nd Avenue
San Francisco, CA 94121
billmcdonnell22@gmail.com

| | |
|---|---|
| **From:** | Mrs. Staci Fleming |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Monday, September 28, 2020 12:11:32 PM |

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Dear Supervisor Norman Yee and Honorable Supervisors:

My name is Staci Fleming and I am a SF resident and live in District 7. I am also a former St. Ignatius parent for 11 years and now a St Ignatius employee for the past 3 years. I am extremely dedicated to the SI mission of educating young men and women to be for and with others, who in turn better our world once they graduate from our school in the Sunset District. During these unprecedented times, this work is more important than ever.

I'm writing in strong support for approval of lights at St. Ignatius Field (File No. F200992 and 200996) in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing S.I. to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the generations of students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Staci Fleming District 7
65 Marcela Ave

SF, CA 96116

--

**Enjoy this SI video:**
This is where it all happens

**Staci Fleming**
Associate Director of Advancement
SI Parent, Class of '11,'13,'16,'19
St. Ignatius College Preparatory
2001 37th Avenue
San Francisco, CA 94116
(415) 731-7500 Ext. 5539
sfleming@siprep.org
www.siprep.org

| | |
|---|---|
| **From:** | Eva Schuth |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Cc:** | nharlan@siprep.org |
| **Subject:** | Letter of Support for lights at JB Murphy Field (Saint Ignatius High School) File No. F200992 and 200996 |
| **Date:** | Monday, September 28, 2020 2:06:00 PM |

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Regarding: Lights at St. Ignatius Field
(File No. F200992 and 200996)

Dear Supervisor Peskin or Honorable Supervisors:

Our family of five has lived in North Beach for almost 15 years and two of our three children currently attend Saint Ignatius High School. All our kids have been playing soccer and other field sports through childhood and into their teenage years. Unfortunately, there are very few practice fields in the Northern part of the city and access to fields in other parts of town is competitive.

There are fewer and fewer spaces for children to practice field sports in San Francisco and allowing SI to install these lights on their field will keep students closer to the campus rather than traveling great distances to practice.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Eva Schuth

1469 Kearny Street, San Francisco, CA94133

| | |
|---|---|
| **From:** | Patrick Timons "21 |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Cc:** | nharlan@siprep.org |
| **Subject:** | Request from Senior in Highschool |
| **Date:** | Monday, September 28, 2020 2:31:10 PM |

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Dear Supervisor Gordon Mar or Honorable Supervisors,

I am a high school senior at St. Ignatius College Prep in San Francisco. In addition to athletics, I spend my time on-taking a rigorous academic course load, surfing, and enjoying California's natural beauty. I've played football and lacrosse at St. Ignatius for four years, yet have never played a game under the lights. Amidst the turmoil and uncertainty associated with today's pandemic, sports and personal development have been the light at the end of the tunnel to help me make it through everything. The possibility of playing sports again motivates me to social distance, work hard in school, and see the bring side of these lockdowns.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically, but to be in service to others. Many of those lessons are learning through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission votes 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Sincerely,

Patrick Timons
ptimons21@siprep.org

| | |
|---|---|
| **From:** | Jon Burke |
| **To:** | burke.miriam@gmail.com; Yee, Norman (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field |
| **Date:** | Monday, September 28, 2020 4:22:08 PM |

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Dear Supervisor Yee and Honorable Supervisors:

Our son Gustavo Burke initially became interested in attending St. Ignatius because of its soccer program and strong support for it by the community - support that we have not seen at any other schools.

I have lived in San Francisco and the Bay Area since I attended UC Berkeley as an undergrad. My wife Miriam has been living here since she immigrated from Brazil nearly two decades ago. We are both professionals with strong roots in San Francisco.

We are writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling further to practice.

St. Ignatius has been a fantastic school not just for academics but also to service others. Especially as we have been remote schooling, many of those lessons, and some of the few in person interactions, are on the sports field. SI has great spectator participation and we gain a strong feeling of community by supporting friends and classmates.

We understand the San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Jon and Miriam Burke

--
Jon Burke
415.309.7572

| | |
|---|---|
| **From:** | Mr. Carlos Gazulla |
| **To:** | Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field. |
| **Date:** | Monday, September 28, 2020 4:29:20 PM |
| **Importance:** | High |

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San Bruno, September 28th 2020

Dear Honorable Members of the San Francisco Board of Supervisors:

My name is Carlos Gazulla and I have been a faculty member in the Language and Fine Arts Departments since 1997. I have also been a soccer coach for boys for several years. My son is a senior at Saint Ignatius and he is one of the goal keepers for the soccer varsity team.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Carlos Gazulla

1690 Monterey Dr.

San Bruno, CA 94066

cgazulla@siprep.org

Carlos Gazulla
Language / Fine Arts Faculty
St. Ignatius College Preparatory
2001 37th Avenue
San Francisco, CA 94116
cgazulla@siprep.org
www.siprep.org

**From:** Kristi Tallerico
**To:** Board of Supervisors, (BOS)
**Subject:** Re: Lights at St. Ignatius Field File No. F200992 and 200996
**Date:** Monday, September 28, 2020 4:33:55 PM

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September 28, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Dear Members of the Board of Supervisors or Honorable Supervisors:

My husband and I are parents of 2 teenage daughters who have been playing soccer for 11 yrs and have recently joined this Elite Club to continue their soccer development journey. We are very excited to be able to give our children the opportunity to be part of this Academy. There are not many clubs that offer what Elite has to offer, especially local in our backyard. Playing soccer or any sport during these unprecedented times is so critical to their physical health and mental wellbeing.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for local and student athletes.

As you may be aware of, there are fewer spaces for the local athletes and student athletes to practice field sports in San Francisco. Installing these lights at SI will keep students closer to the campus, rather than traveling great distances to practice.

In addition, installing lights can provide many benefits to the player and fans, , more flexible scheduling for games and practices and most importantly safety of the athletes

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Kristi and Dan Tallerico

tallericokristi@gmail.com

**From:** Olivia Ripple "23
**To:** Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS)
**Subject:** Lights at St. Ignatius Field
**Date:** Monday, September 28, 2020 4:57:45 PM

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Dear Board of Supervisors:

I am a sophomore student-athlete (I play 2 sports) at St. Ignatius College Prep and playing athletics is a very important aspect of my high school experience, both physically and mentally. I am writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student-athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically, but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Olivia Ripple

oripple23@siprep.org

| | |
|---|---|
| **From:** | Caoilinn Durkin "23 |
| **To:** | Board of Supervisors, (BOS) |
| **Cc:** | "Tom Atencio"; Ms. Nicole Harlan |
| **Subject:** | Lights at St. Ignatius Field |
| **Date:** | Monday, September 28, 2020 5:38:32 PM |

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9/28/2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Honorable Supervisors,

I am a sophomore at St. Ignatius. I live in Marin, but I love playing soccer for my school.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Caoilinn Durkin

cdurkin23@siprep.org

**From:** katie dyos
**To:** Fewer, Sandra (BOS); Board of Supervisors, (BOS)
**Cc:** sharlan@siprep.org
**Subject:** St Ignatius College Prep Field Lights
**Date:** Monday, September 28, 2020 6:08:34 PM

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September 28, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Fewer and Honorable Supervisors:

My name is Katie Dyos and I have lived in San Francisco's Sunset and Richmond Districts since 1995. We own a small business in San Francisco for the past 30 years, Soiree Valet Parking Service Inc. We have pivoted with the pandemic and opened a new company called ProtectRide.com. My husband and I have 2 sons (Our youngest is currently a Junior at SI and our oldest is a college Freshman, he attended all four years at St Ignatius College Prep. Our boys play year round soccer and are active players on the SI Soccer team. We are fully aware of the need of more fields for sports in San Francisco.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be of service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the

impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field, our beloved JB Murphy Field and thank you for your consideration.

Sincerely,

Katie Dyos

319 29th Ave
San Francisco, CA 94121
katiemcdyos@gmail.com

| | |
|---|---|
| **From:** | Artie D |
| **To:** | Marstaff (BOS); Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Monday, September 28, 2020 6:16:50 PM |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear President Yee and Supervisor Mar and the rest of the Supervisors:

My name is Arthur DelNegro. I am the parent of two St. Ignatius College Prep athletic girls. This is the 3rd of 6 years I will have daughters at SI. They are both multi-sport athletes and have both become strong young women through athletics. My older daughter is currently in conversations with multiple Division 1 Lacrosse programs about continuing to play lacrosse in college.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law. My daughters have already lost their Spring and Fall sports seasons due to COVID-19. We understand why three seasons will be compressed into two in the Winter and Spring of 2021 but with this change, there is a challenge due to limited field space and daylight.

Even in a normal year, there are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Arthur DelNegro
arthur.delnegro3@gmail.com

| | |
|---|---|
| **From:** | Mike Theoharis |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Pls vote YES- Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Monday, September 28, 2020 7:35:46 PM |

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Dear Norman and Honorable Supervisors:

My name is Mike Theoharis and I grew up in San Francisco attending Commodore Sloat, Aptos Middle School, and then St. Ignatius. The reason I attended SI was because I had grown up spending much of my summers at West Sunset Playground. I saw the baseball team at SI and I aspired to be there. (I actually grew up a few doors down from the Yee family, small world.)

Thanks to the opportunities provided to me by the City of San Francisco, our public schools, and SI I later earned a baseball scholarship to Santa Clara University. From there I played a couple years of professional baseball before going into coaching.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law. Having both played and coached at SI, I know how important it is to create time and space for athletics. The constraint of not having lights is very limiting for the kids who attend SI and use the field and I believe it will cause minimal disruption for the neighboring community.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing S.I. to install these lights will keep students closer to the campus rather than traveling great distances to practice. As a former coach, I can attest to how difficult that can be.

Please vote yes to the lights at St. Ignatius Field and thank you for your consideration and all that you do as public servants. As a lifelong San Franciscan, I appreciate your efforts on behalf of our City.

Sincerely,

Mike Theoharis Mike.theoharis@gmail.com 415.515.9385 (cell)

**From:** Richard Yuen
**To:** Board of Supervisors, (BOS); Nicole Harlan
**Subject:** (Support) Lights at St. Ignatius Field File No. F200992 and 200996
**Date:** Monday, September 28, 2020 8:14:25 PM

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September 28, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Honorable Supervisors:

My name is Rick Yuen, an alumni of St. Ignatius. I am a lifelong resident of San Francisco and cherish our City.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing S.I. to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the generations of students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Please take good care,

Rick Yuen
1592 Union Street #252
San Francisco, CA 94123

richardyuen00@gmail.com

Cc: Nicole Harlan, St. Ignatius College Preparatory

| | |
|---|---|
| **From:** | Colleen Cotter |
| **To:** | Preston, Dean (BOS) |
| **Cc:** | Preston, Dean (BOS); Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights @ St. Ignatius Field - Strong Support |
| **Date:** | Tuesday, September 29, 2020 6:32:24 AM |

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Date

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Dean Preston & Honorable Supervisors:

I am a San Francsico native & long time resident of San Francisco, I was born & raised in the sunset & I have lived in Hayes Valley for many years, I am also a real estate agent so I have the opportunity to connect with a lot of SF residents each day.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law. In this unique time, we need to allow for activities that encourage & support outdoor activities & there are fewer and fewer spaces for students to practice field sports in San Francisco and allowing S.I. to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an outstanding educational institution not just to take tests and excel academically but to be in service to others. So many of those lessons are learned through the shared experience on the sports field, not just for the athlete but for those who support them & for the community. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. More than ever, it is so so important that we create & support areas for our students to remain outdoors & active. Please consider the generations of students who will be impacted by this addition to our field sports program and the impacts it will have on the positive

development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Colleen Cotter
11 Haight #3, SF CA
ccotter@vanguardsf.com

**Colleen Cotter**

Licensed Real Estate Salesperson, BRE Lic. # 01703078
Top Producer, 2009-2019
www.colleencottersf.com

*Ranked in the top 1% of agents in San Francisco*

1801 Fillmore Street, San Francisco, CA 94115
M: 415.706.1781
E: ccotter@Vanguardsf.com

| | |
|---|---|
| **From:** | Kasey O"Connell |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 6:54:28 AM |

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29 September 2020

Supervisor Rafael Mandelman
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Mandelman:

I have lived in District 8 for over 17 years and San Francisco for over 25. I am the mother of 2 boys, 17 and 13, and now more than ever it is imperative that children are able to exercise and play sport. Their well-being should be a top priority for our city. My 13 year old currently plays soccer for SF Elite Academy and practices on St. Ignatius Field. St. Ignatius College Preparatory so graciously enables so many student athletes to play sport on their fields every year. They are doing a great service to the larger San Francisco community.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law. There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will provide more opportunity for all to practice sports.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Again, it is imperative that we provide opportunities for the young to play sport and give them hope, health and a future. Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Kasey O'Connell
1516 Masonic Ave. 94117
kaseyzoconnell@gmail.com

**From:** Mr. John Stiegeler
**To:** Board of Supervisors, (BOS)
**Subject:** Field Light Approval
**Date:** Tuesday, September 29, 2020 10:09:43 AM

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**San Francisco Board of Supervisors**:

September 29, 2020

Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: File No. 200992 and 200996

My name is Mr. John Stiegeler and I am a Second Generation San Franciscan. I have taught and coached at Saint Ignatius College Preparatory for over forty years. I was also involved in the campaign to get fields and lights installed at Beach Chalet in Golden Gate Park. I believe that has been an overwhelming success for the City of San Francisco and that this project will be as well.

I grew up in the Richmond District, went to school at St Monica, and then went to Saint Ignatius. When I was growing up the facilities at Polo Fields, Crocker Amazon, and Beach Chalet were poor at best. Over the years I have seen the benefits of fields and especially what lighted fields bring to the City. I worked with both Jim Lucey and Quinton Kopp on getting the West Sunset field (Jim Lucey Fields) built years ago. As a youth coach at Saint Gabriel School I saw the immediate positive impact the lights had on the South Sunset field (Soccer & Baseball) for the youth of the city.

If you approve the project, students will no longer have to stretch themselves to the point of their health and wellness. These lights will help the students manage family, school, sports and other activities. Time is a very important commodity these days and installation of these lights will benefit all. I believe the decision to

approve the project at Saint Ignatius is a decision that will positively affect generations to come.

I highly support and recommend the lights for Saint Ignatius field. I see it as a win, win for both the Sunset District and the City. Please vote YES! to the lights on the Saint Ignatius field and thank you for your time and consideration.

Sincerely

Mr. John Stiegeler
Teacher and Coach
Saint Ignatius College Preparatory

--
Mr John Stiegeler
Social Science Department
Green Team Co-Moderator
Boys Freshman Soccer Coach
Girls and Boys State Coordinator
Saint Ignatius College Preparatory
jstiegeler@siprep.org

| | |
|---|---|
| **From:** | Adam Handlos |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Lights at St. Ignatius Field - Re: File No. 200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 11:41:03 AM |

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Dear Commissioners:

It was brought to my attention that there has been an appeal of the decision made by the Board of Supervisors over the summer. I have been notified that a new hearing is scheduled to be held in October and I wanted to once again send my support of a yes vote to the lights for the field. I hope the below will give you a sense of why, as a resident of the district and close neighbor of St. Ignatius, I am in strong support.

My name is Adam Handlos and I am a 4th generation San Franciscan, a third generation St. Ignatius alumnus and a former member of the Wildcat football and track teams. I grew up in Ingleside Terrace, have worked downtown as an accountant since my college graduation in 2006 and in 2017, I became a homeowner in District 4, just two blocks from S.I.

I'm writing in strong support for the approval of lights at St. Ignatius Field for many reasons but know that all of them are centered on one common theme; improving the experience for the students and community of S.I.

S.I. has come so far in its offerings to students since I graduated in 2002 and part of this has been the expansion of its sports programs. They have been using off campus fields and holding practices in the early morning before school since I attended. Sporting events that are held on campus often start in the early afternoon to ensure they end prior to sunset, leading to missed class time for the student athletes. There is a simple answer, which is the installation of lights on the main field which will lead to more sleep and adequate practice and game time for all. This will also strengthen our community by having more opportunities to come together to support its student athletes.

We all know that this has been a long and well thought out process. The leaders of S.I. have done their homework and are looking to implement state-of-the art technology within their lighting to ensure it is not disruptive to their neighbors. S.I. has always had a good relationship with its neighbors and been active in serving its community.

On a more personal note, as a former football player, there was nothing I looked forward to more than a Friday night game under the lights at Kezar. These games carried much more excitement which was evidenced by the increase in attendance and support from our students and the community as a whole. The only thing that could have topped this experience would have been replicating this environment and allowing the team to band together to defend their own home field with pride. These students and their community deserve the opportunity to experience what no other player in the 50-year history of this campus has.

St. Ignatius College Preparatory is an excellent center of learning, whether in preparation for

tests, battles on the field or in service to and justice for others. I have learned more than I sometimes realize during my time at S.I, but so many of those lessons were learned from my teammates and coaches, which is why the athletics programs and proper field time is so vital to the students.

Since I have lived in District 4, one way I have supported St. Ignatius is through an athletic sponsor pass and I have attended many events on campus with my family. I hope to be able to continue to do this as my children grow up and one day, experience the pride of watching them defend the same field I once did...under the lights!

I implore you to please vote **Yes** to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Adam Handlos
2174 35th Avenue
San Francisco, CA 94116
adam.handlos@gmail.com
415-370-8240

| | |
|---|---|
| **From:** | Angela Sicord |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 11:56:10 AM |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Mar or Honorable Supervisors:

My name is Angela Sicord, native of San Francisco and the Sunset District. I still live in Sunset District with my husband and 3 kids. I've seen the Sunset District ebb and flow in good times and bad. However, what is promising is the the number of families choosing to stay in our neighborhood instead of moving out of SF. While still more work is needed, I see the sense of community expanding with new farmer market, more businesses, residents getting involved, and more activities and opportunities for families.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Angela Sicord

1579 37th Avenue

angela.sicord@sbcglobal.net

| | |
|---|---|
| **From:** | Mike Strain |
| **To:** | Fewer, Sandra (BOS) |
| **Cc:** | Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 12:00:08 PM |

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9/29/2020

Supervisor Sandra Fewer
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Fewer:

I am sending you this email, as a 25+ year resident of District 1. My wife and I moved into our current house in 2003, and the city has seen many changes in that time. We have made a conscience choice to stay in the city that we love, and send our children to schools here in San Francisco.

I'm writing in strong support for approval of lights at JB Murphy Field at St. Ignatius in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Mike Strain
130 Funston Ave
m_strain@yahoo.com
(415) 509-1541

| | |
|---|---|
| **From:** | Ryan, Bill |
| **To:** | Yee, Norman (BOS) |
| **Cc:** | Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius |
| **Date:** | Tuesday, September 29, 2020 12:06:00 PM |

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September 29, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Norman Yee and Honorable Supervisors:

My name is Bill Ryan, and I have had 3 children attend St. Ignatius College Prep in San Francisco over the past 8 years. My sons and daughter have played on 28 teams (and counting) at SI including football, baseball, lacrosse, field hockey, and soccer on the outdoor fields. This does not count summer teams, or indoors sports, so we have been to a few ballgames over on 37th Avenue, as you can imagine. My son Danny is now a receiver at USC. We need lights.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those

lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Bill Ryan
billyryan67@yahoo.com

| | |
|---|---|
| **From:** | Joe Laveroni |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Cc:** | nharlan@siprep.org |
| **Subject:** | Re: Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 12:25:54 PM |

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Dear Supervisor,

My name is Joe Laveroni and I am a 23 year resident of San Francisco. I am a St. Ignatius Alumni, former student-athlete, and have close family members and friends who work at St. Ignatius.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.
There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing S.I. to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the generations of students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,
Joe Laveroni
25 Vasquez Avenue, San Francisco CA

---

Joe Laveroni | Class of 2020

Sports Business B.A. & Professional Sales Certificate

Arizona State University

https://www.linkedin.com/in/joelaveroni/

jlaveroni@comcast.net | (415) 806-8483

| | |
|---|---|
| **From:** | Mr. Robert Marcaletti |
| **To:** | Mike Strain |
| **Cc:** | Fewer, Sandra (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Re: Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 12:26:01 PM |

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Great Email!

Thanks for the help!

On Tue, Sep 29, 2020 at 11:59 AM Mike Strain <m_strain@yahoo.com> wrote:

> 9/29/2020
>
> Supervisor Sandra Fewer
> and Members of the San Francisco Board of Supervisors
> City Hall
> 1 Dr. Carlton B. Goodlett Place, Room 244
> San Francisco, CA 94102-4689
>
> Re: Lights at St. Ignatius Field File No. F200992 and 200996
>
> Dear Supervisor Fewer:
>
> I am sending you this email, as a 25+ year resident of District 1. My wife and I moved into our current house in 2003, and the city has seen many changes in that time. We have made a conscience choice to stay in the city that we love, and send our children to schools here in San Francisco.
>
> I'm writing in strong support for approval of lights at JB Murphy Field at St. Ignatius in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.
>
> There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.
>
> St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.
>
> The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the

> students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.
>
> Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.
>
> Sincerely,
>
> Mike Strain
> 130 Funston Ave
> m_strain@yahoo.com
> (415) 509-1541

--
Rob Marcaletti '96
Associate Athletic Director
St. Ignatius College Preparatory
2001 37th Avenue
San Francisco, CA 94116
O: 415-731-7500 ext. 5335
C: 650-455-1821
www.siprep.org

**From:** Chris and Lilly Angelopoulos
**To:** Mar, Gordon (BOS); Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS)
**Subject:** SI lights! File No. 200992 and 200996
**Date:** Tuesday, September 29, 2020 2:30:31 PM

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September 29, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Mar and Honorable Supervisors:

My name is Chris Angelopoulos.
I am born and raised in the Sunset District of San Francisco and attended St. Ignatius Class of 1988 and still reside and do business here in the City with my family.

My oldest daughter graduated from SI in 2018, and I have a son and daughter still at SI. My son has entered his Senior year of Wildcat Football. I am a strong supporter of the lights at J.B. Murphy field and feel that it would enhance the experience for both the students and parents at St. Ignatius. SI is a place that teaches its students so much, and many of those lessons are taught through the sport programs that students participate in. Lights will allow for students to not have to travel far for certain games and practices and allows for a better experience all around.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Chris Angelopoulos
1348 22nd Avenue
San Francisco,CA 94122
clasangelopoulos@hotmail.com

| | |
|---|---|
| **From:** | Heidi Gomozias |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); sandra.fewer@stgov.org; Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | IN FAVOR OF: Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 2:44:15 PM |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA **94102-4689**

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Honorable Supervisors:

My family has been a part of the St. Ignatius College Preparatory community for 35 years. Included in our family are 3 SI graduates and one current student. We have remained active within the community since the early 1980's and find the administration, faculty, staff and student body continue to be a great asset to San Francisco. St. Ignatius has been a pilar of education in San Francisco dating back to 1855 and continues to this day. My husband played 2 sports at SI 1981-1985, as did my twin daughters 2013-2017, and now my son who will graduate in the class of 2023. Given the number of athletic teams and opportunities to play at SI, finding facilities to support all the student athletes and teams in San Francisco is always a challenge.

**I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.**

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the

students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

**Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.**

Sincerely,

Heidi and Constantine Gomozias ‘85

Heidi Gomozias
President
CompWise Consulting
heidig@compwiseconsulting.com
Phone: 408-460-1365

| | |
|---|---|
| **From:** | Heather Elder Email |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Yes to the lights at St. Ignatius Please! |
| **Date:** | Tuesday, September 29, 2020 2:45:12 PM |

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September 29, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Catherine Stefani or Honorable Supervisors:

I've live in District 2 for for just over eleven years. I am the mother of three children, two who graduated from and one who is currently enrolled at St. Ignatius. All of my children have been avid athletes, participating in the school's football and field hockey and basketball programs. They all have gained so much enrichment from their varsity experiences at St. Ignatius.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for my son and other student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Heather Elder
2165 Jackson Street, San Francisco, CA 94115
heather@heatherelder.com

| | |
|---|---|
| **From:** | Jamie Dyos |
| **To:** | Fewer, Sandra (BOS); Board of Supervisors, (BOS) |
| **Cc:** | SHarlan@siprep.org |
| **Subject:** | St Ignatius College Prep Field Lights |
| **Date:** | Tuesday, September 29, 2020 3:20:30 PM |

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September 29, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Fewer and Honorable Supervisors:

My name Jamie Dyos and I have lived in San Francisco's Richmond Districts for over 30 years. I have owned and operated a small business in San Francisco for the past 30 years, Soiree Valet Parking Service Inc. We have pivoted with the pandemic and opened a new company called ProtectRide.com.

My wife and I have 2 sons, our youngest is currently a Junior at SI and our oldest is a college Freshman, he attended all four years at St Ignatius College Prep. Our boys play year round soccer and are active players on the SI Soccer team. We are fully aware of the need of more fields for sports in San Francisco.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be of service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on

the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field, our beloved JB Murphy Field and thank you for your consideration.

Thank you for your consideration,

Jamie S. Dyos

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Jamie S. Dyos
President
Soiree Valet Parking Service, Inc.
Dba ProtectRide
1470 Howard Street
San Francisco, CA 94103-2523
Phone: 415-284-9700 or 800-660-1906
Direct: 415-284-9711
Cell: 415-559-2469
Fax: 415-284-9770
Email: Jamie@soireevalet.com
Web: www.soireevalet.com
Web: www.ProtectRide.com

| | |
|---|---|
| **From:** | Seana Patankar |
| **To:** | Safai, Ahsha (BOS) |
| **Cc:** | Board of Supervisors, (BOS); nharlan@siprep.org; Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 3:31:54 PM |

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9/29/20

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Safai:

I grew up within walking distance of SI and my brother attended SI (at the time it was all boys). I have a son who just graduated and who used the fields almost every day and I have daughter currently attending SI who will be using the fields again once soccer starts back up.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Seana Patankar, *IIDA, NCIDQ, LEED AP*
---
**evoco** architecture | interiors
160 south linden avenue suite 210
so. san francisco, ca 94080
t: 415-312-0560
evoco@evocoarch.com
http://www.evocoarch.com/
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| | |
|---|---|
| **From:** | Gary Sulentic |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Please support Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 3:39:54 PM |

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09/29/2020

President Norman Yee, Supervisor Mandelman
and All Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Dear Supervisor Mandelman and Honorable Supervisors,

My wife Kamala Mostert and I have lived in San Francisco District 8 as homeowners and residents at 1515 Guerrero since 1998 and have raised our two kids in our SF home since birth. Our youngest Grayson is now a Sophomore at St. Ignatius and is active in sports, including football, track and swimming and our daughter is a Senior at University High School near The Presidio. Kamala is a small business owner, having run her architecture firm, Mostert Architecture, in The City for 23 years. I've worked in senior-level technology roles at SF-based offices for a number of companies, including Gap Inc., Dropbox, Bitly, and Autodesk.

I’m writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Gerard Sulentic
1515 Guerrero Street, San Francisco, CA 94110
gjsulentic@yahoo.com

**From:** Jennet Nazzal
**To:** Fewer, Sandra (BOS); Board of Supervisors, (BOS); Yee, Norman (BOS)
**Cc:** Don Nazzal
**Subject:** In Support of lights at St. Ignatius Athletic Field
**Date:** Tuesday, September 29, 2020 3:42:25 PM

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September 29, 2020

President Norman Yee
Supervisor Sandra Fewer
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Fewer and Honorable Supervisors,

We are lifelong San Franciscans and have lived in the Richmond District for over 25 years. We are committed to strengthening our community with healthy, active outlets for our young people to enjoy their quality of life.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.
There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Jennet & Don Nazzal
734 21st Avenue
San Francisco, CA 94121

| | |
|---|---|
| **From:** | Diane Cummings |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Cc:** | Robert Cummings ; cummings6@comcast.net |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 3:49:39 PM |
| **Importance:** | High |

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Dear President Norman Yee and Members of the San Francisco Board of Supervisors,

Our family has four children; graduates of Saint Ignatius in 2012, 2016, 2020 and our son Matthew will graduate in 2022. Raising teenagers is today's environment where digital media is flooding their lives, sports have been our successful tool to keep each of them healthy, focused and disciplined during their HS years. The SI community is not only where are children have made lasting friendships but we, as parents have formed solid friendships. Memories of sitting in the bleachers on so many cold foggy days, watching our children at a sporting event are priceless and will always be cherished.

***I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.;*** There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.; St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students; The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it;

***Please vote YES! to the lights at St. Ignatius Field*** **!** Thank you for your consideration and helping to keep our kids safe for generations to come.

and thank you for your consideration.;

Sincerely,

Diane & Robert Cummings
251 Richardson Drive, Mill Valley CA 94941
415-515-5243
Cummings6@comcast.net
Rob.cummings@comcast.net

| | |
|---|---|
| **From:** | Mardi Dier |
| **To:** | mandelmannstaff@sfgov.org |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); Peskin, Aaron (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); shamann.walton@sfgov.og; Board of Supervisors, (BOS) |
| **Subject:** | Support of lights at JB Murphy Field at St Ignatius Prep File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 4:01:38 PM |

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September 29, 2020

President Norman Yee and Members of the SF Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA. 94102

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Mandelman or Honorable Supervisors:

I am Mardi Dier at 32-year resident of San Francisco and the last 25 of those in District 8 on Buena Vista Terrace. I work in biotechnology and am a parent of three sons whom I have raised in this City that we all love and care for greatly.

I am writing today in strong support for the approval of the adding lights to the JB Murphy Field at St. Ignatius College Prep. This will create more options for student athletes and also allow St. Ignatius to implement later start times in accordance with CA State Law.

As we all know, there are fewer spaces for students to practice field sports in SF and by allowing SI to install the lights, it will keeps students closer to school's campus rather than traveling great distances to practice or compete. With three sons - all of whom attended or still attend SI - I can attest to the extra driving and suboptimal practice spaces because of light restrictions. Adding the lights to the field is a significant and logical step for a school and field of this size. The positive impact for these kids would be considerable.

SI has been an excellent center of learning and tradition with sports being a critical part of the SI environment. Please consider the students who will benefit from additional field time and programs with the additions of the lights. This is a great benefit in the development of our young students.

The SF Planning Commission voted 6 to 1 in favor of the approval in July and the process has been underway for over seven years. I hope we can count on your and please vote YES! To the lights at the SI Field and thank you for your consideration.

Sincerely,

Mardi Dier
75 Buena Vista Terrace
SF, CA 94117
Mardicdier@gmail.com

Mardi Dier

415-509-3632 (c)

| | |
|---|---|
| **From:** | Anthi Janssens |
| **To:** | Yee, Norman (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File no. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 4:38:35 PM |

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September 29, 2020

President Norman Yee and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Norman Yee,

My name is Anthi Janssens and I live with my family in the quiet Sherwood Forest neighborhood in Miraloma Park for 15 years.
I am a mother of two wonderful kids, a seventh grade boy at St. Stephen School and a daughter who is a sophomore at Saint
Ignatius Preparatory. My husband owns an engineering firm in downtown San Francisco. We both have been San Francisco residents for over 20 years.

I am writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to
Implement a later start time in accordance with CA State law.
As time goes by, there are fewer and fewer spaces for students to practice field sports in the city and allowing SI to install these lights will keep students closer to campus rather than traveling great distances to practice.

Ever since our kids were little, they have been in sports whether it is soccer, basketball, baseball, swimming, golf, or volleyball. Team sports help teach our students dedication, leadership and accountability, as well as improved cardiovascular health.
And they have made so many friends along the way.

St. Ignatius College Preparatory has been such an excellent center of learning not only academically but also in service to others. We are so proud and lucky to be in a school with so many service opportunities for our daughter. And because of that there is such a strong community bond.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years now.
Please consider our amazing students who will be impacted by this addition to our fields sports program
and the impacts it will have on the positive development of young lives especially at the current times.

Our kids and their happiness mean the world to us! Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Anthi Janssens
415 Moilmo Drive @ Myra Way
anthigj@gmail.com

| | |
|---|---|
| **From:** | Michele Trufelli |
| **To:** | Stefani, Catherine (BOS) |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 4:42:24 PM |

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29 September 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Stefani and Honorable Supervisors:

My name is Michele Trufelli and I am fortunate to live with my family in beautiful District 2. We have lived within a few blocks of our current home for nearly 20 years. My youngest son attends St. Ignatius and loves to compete with his soccer teammates - he can't wait to get back out there on the field!

I am writing in strong support for approval of lights at St. Ignatius Field. Field lighting will create more options for student athletes and also allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco. Allowing SI to install these lights will enable the school to better utilize the field space we are so grateful to already have. Keeping students closer to the campus in the later afternoon and evening rather than traveling great distances to practice is both safer and more green.

St. Ignatius College Preparatory has been and continues to be an excellent center of learning, community and service to others. Many invaluable lessons are learned through the shared experience on the sports field. Even students who participate only as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will benefit by this addition to our field sports program and the impact it will have on the positive development of our future leaders.

Please vote YES! to the lights at St. Ignatius Field and thank you very much for your consideration.

Sincerely,

Michele Trufelli
440 El Camino Del Mar
San Francisco, CA 94121
mltsf00@gmail.com

| | |
|---|---|
| **From:** | Colin Higgins |
| **To:** | Mar, Gordon (BOS) |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Action needed -Lights at St. Ignatius Field |
| **Date:** | Tuesday, September 29, 2020 4:53:27 PM |
| **Attachments:** | image003.png |

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Dear Supervisor Mar:

I am a 15 year resident of the Sunset District and am the CEO of a wealth management firm and more relevant a long-time coach and supporter of youth based sports in the city. My wife is a 20+ year employee of SFUSD, we have two children who are student athletes and we have a deep appreciation for the value of youth athletics to this community.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice. This is not only a burden for the students but for the working parents who need to transport them as well.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Colin Higgins

th

1927 20 Avenue, SF CA 94116

**Colin Higgins**
*Chief Executive Officer*
919 E Hillsdale Blvd, Suite 150 Foster City, CA 94404
**O: 650.212.2240 F: 650.212.2249** | summitry.com

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| | |
|---|---|
| **From:** | Valerie Nicolson |
| **To:** | Mar, Gordon (BOS) |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 5:30:23 PM |

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September 29, 2020

President Norman Yee and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Mar:

My husband and I bought our house on 23rd Ave. and Ulloa St. 26 years ago in 1994. Neither of us are San Francisco natives, and we were initially quite hesitant to settle here and raise a family, but we found a warm extended community through our children's schools, including St. Ignatius College Preparatory.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for students and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

When our daughter was a freshman at St. Ignatius, I remember asking her if there was a home football game that she and her friends would attend on Friday night. I was disappointed to learn that the only nighttime football was the Bruce-Mahoney game, and that was also the only game that everyone attended. Growing up in Iowa, fall Friday night football games were the centerpoint of life...the singers performed the national anthem, the musicians played in the pep band, the dancers and cheerleaders entertained us, the parents sold food and hot chocolate, and the athletes played football. In the spring, we all attended evening track meets to cheer on our friends. The school field was a safe place for everyone to have fun on Friday night. But of course, our field had lights.

Our last child is now a student at St. Ignatius, and he's our first football player. Practice ends at 6 pm, so by the end of the season the kids are finishing practice after sunset. It can't be much fun for the players or coaches, and I worry that someone will be injured in the dark. Lighting the field would solve the problem.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Valerie Nicolson
2507 23rd Ave., San Francisco 94116
mrsnicolson@gmail.com

| | |
|---|---|
| **From:** | Mr. John Mulkerrins |
| **To:** | Yee, Norman (BOS); Mar, Gordon (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field -- File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 5:31:12 PM |

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President Norman Yee and Members of the San Francisco Board of Supervisors
City Hall - 1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

**Re: Lights at St. Ignatius Field File No. F200992 and 200996**

Dear Supervisor Norman Yee, Supervisor Gordon Mar, and Honorable Supervisors:

My name is John Mulkerrins and I am the Athletic Director at St. Ignatius College Prep. I am a first-generation and native San Franciscan, grew up with my parents on 28th and Taraval **(District 4)**, bought my first home on 14th and Judah **(District 7)**, and am currently raising my family on Morningside Drive **(District 7)**. My mom still lives in her home on 28th Avenue which she bought in 1958! I attended San Francisco State University and have been working with school-aged children my entire life -- teaching physical education, junior high math, coaching youth and high school sports, and been a sports administrator for nearly 30 years. It would be a very fair statement the Mulkerrins Family loves San Francisco -- so thank you for all the work you do to make our City a great place to live!

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice. I am in charge of scheduling practices and contests for SI's 66 teams. It's quite a puzzle and the transporting of students off-campus to practice is challenging for our students and coaches. Lights on our campus would really help our students manage their day between school and practice. For example, we would host study-halls for teams with later practices on our campus so students can get a majority of their homework done before practice.

St. Ignatius is a great school and when I attended SI, it was an all-boys school. SI went coed 30-years ago and the addition of female students has made the school even greater. It also doubled the size of our athletic department. Simply stated, lights on our field would benefit all SI students and coaches for practices and games. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

John Mulkerrins
62 Morningside Drive
SF, CA 94132
jmulkerrins@siprep.org

--

**John Mulkerrins**
Director of Athletics
St. Ignatius College Preparatory
2001 37th Avenue
San Francisco, CA 94116
O: 415-731-7500 ext. 5276
C: 415-613-7559
F: 415-682-5077
www.siprep.org
**Go 'Cats!**

| | |
|---|---|
| **From:** | Mr. Michael Shaughnessy |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Supporting Lights at Saint Ignatius |
| **Date:** | Tuesday, September 29, 2020 5:40:09 PM |

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Dear Supervisors,

I am sending a copy of the letter I wrote to the Park and Rec Commission who looked at lighting SI field:

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.

I am a life-long Sunset resident and retired last year after teaching for 40 years at Saint Ignatius. My three adult children played sports for AP Giannini and Saint Ignatius. I watched the Jim Lucey soccer fields being constructed from my classroom window and used to watch baseball, softball, soccer and lacrosse games at West Sunset when SI could still use City fields. I coached Viking soccer teams that practiced and played at West Sunset, including the lighted softball fields during the evenings with early sunsets.

I remember when the City refused to allow the soccer fields to be lighted after the neighbors objected. I'm not sure how many of you remember that part of the cause of the objection was in response to the City's granting permission for adult league games on weekends while not arranging for the restroom facilities to be opened.

Saint Ignatius is a good neighbor and works diligently to provide recreational opportunities to hundreds of student athletes, currently arranging transportation for hundreds of athletes to Pacifica for practice and competition. At Saint Ignatius, athletics are considered co-curricular, not extra-curricular. Lessons of commitment, discipline, service and community are learned on athletic fields as much as in classrooms.

Please vote YES!

Thank you for your consideration.
Sincerely,
Michael
--
Religious Studies - retired
St. Ignatius College Preparatory
mshaughnessy@siprep.org

1374 La Playa Street
San Francisco, CA, 94122

| | |
|---|---|
| **From:** | Brett Bonthron |
| **To:** | Yee, Norman (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | District 7 Resident - Let"s let the kids win again |
| **Date:** | Tuesday, September 29, 2020 5:48:38 PM |

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Supervisor Yee - thank you for your years of service to the district. My family has been happy to call D7 our home for many years. We wish you luck in your next endeavor.

As a Board Member of the San Francisco Youth Soccer League that serves thousands of San Francisco children, I was on the front lines of the battle to develop Beach Chalet soccer fields and, yes, install lights there. Thanks to support from many Supervisors like yourself, Beach Chalet was built and it has served our children well.

**So here we go again.** This time, we're debating the lights at SI's athletic fields. Once again, I sat in Planning Commission meetings (though this time on Zoom!). I listened to the Commission's thoughtful questions and believe they made the right choice. I've also listened to all the arguments made by a small, vocal minority of residents against the lights. I've done my homework. The SI Athletic Field lighting proposal should go forward.

Please support the the proposal, support the Planning Commission's due diligence, and once again, **let the kids win**.

Brett Bonthron
421 Moraga St.
San Francisco, 94122

| | |
|---|---|
| **From:** | Megan Mulkerrins |
| **To:** | Yee, Norman (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 6:52:56 PM |
| **Attachments:** | Lights at St. Ignatius Field File No. F200992 and 200996.msg |

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| | |
|---|---|
| **From:** | Megan Mulkerrins |
| **To:** | Yee, Norman (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Tuesday, September 29, 2020 6:52:40 PM |
| **Attachments:** | Letter to supervisor.pdf |

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September 30, 2020
President Norman Yee and Members of the San Francisco Board of Supervisors
City Hall - 1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Norman Yee and Honorable Supervisors,

My name is Megan Mulkerrins and I have lived in San Francisco since I was born here 18 years ago. I recently graduated as part of the class of 2020 from Saint Ignatius and my time there was largely defined by being a three sport student-athlete for all 4 years of high school. I participated in 3 outdoor sports including field hockey, soccer, and crew. All 3 sports required the use of off campus facilities. One of the challenging parts of high school is managing time in a way that allows you to succeed in all aspects of your life and travelling to off campus practice facilities only added to this challenge. Everyday you would need to account for travel time to and from practice and it would make it difficult for both the athlete -- knowing you wont get the full practice time you are slotted, and, the student -- knowing this precious time driving and waiting for teammates could be spent studying or doing homework. Practices were always scheduled right after school in order to beat traffic and finish before the sun set which conflicted with having time to meet with teachers who usually only stay for a short period of time after the final school bell. Having lights on the field would allow all athletes to succeed more in an academic and athletic way. Later practice slots would allow teams to meet beforehand and have a study hall dedicated to homework. Teams would gain access to more resources like going to the library and meeting with teachers for extra help or classmates for group projects. This would also ensure teams get the complete time slot for their practices and have the joy of playing on campus gaining recognition from their peers for their dedication and hard work. I loved being an athlete at Saint Ignatius and many of my closest friends and most influential mentors came from my teammates and coaches. If there is a way to make this experience even better for people after me I would definitely urge for that opportunity to be taken and I believe the best way to do that is by adding lights to the field.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! To the lights at St Ignatius Field and thank you for your consideration.

Sincerely,

Megan Mulkerrins
62 Morningside Dr San Francisco, CA 94132
megan.mulkerrins2020@gmail.com

**From:** Marco Smith "23
**To:** Stefani, Catherine (BOS)
**Cc:** Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Walton, Shamann (BOS); Board of Supervisors, (BOS)
**Subject:** Lights at St. Ignatius Field File No. F200992 and 200996
**Date:** Tuesday, September 29, 2020 9:40:39 PM

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29 September 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Stefani and Honorable Supervisors:

My name is Marco and I am fortunate to live with my family in District 2. We have lived within a few blocks of our current home for my whole life. I am a sophomore at St. Ignatius and love to compete with my soccer teammates. I can't wait to get back out there on the field! GO CATS!

I am writing in strong support for approval of lights at St. Ignatius Field. Field lighting will create more options for student athletes and also allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco. Allowing SI to install these lights will enable the school to better utilize the field space we are so grateful to already have. Keeping students closer to the campus in the later afternoon and evening rather than traveling great distances to practice is both safer and more green.

St. Ignatius College Preparatory has been and continues to be an excellent center of learning, community and service to others. Many invaluable lessons are learned through the shared experience on the sports field. Even students who participate only as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will benefit by this addition to our field sports program and the impact it will have on the positive development of our future leaders.

Please vote YES! to the lights at St. Ignatius Field and thank you very much for your consideration.

Sincerely,

Marco Smith
440 El Camino Del Mar
San Francisco, CA 94121

| | |
|---|---|
| **From:** | caitlin spaan |
| **To:** | MandelmanStaff, [BOS] |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); Mar, Gordon (BOS); Peskin, Aaron (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights for Saint Ignatius - Field File No. F200992 and 200996 |
| **Date:** | Wednesday, September 30, 2020 6:06:52 AM |

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Hi Supervisor Mandelman,

I'm a longtime Noe Valley resident & parent of two Saint Ignatius College Prep athletes. Both my boys have played numerous sports in the city, so I'm deeply familiar with the facilities, from soccer pitches at Crocker Amazon and Beach Chalet to Flag football and baseball fields on Treasure Island. One of the reasons we've stayed in the city to raise our kids vs fleeing to the 'burbs is because of the excellent places the kids can play & the fun my whole family has had watching them.

That said, over the years we've noted that there are fewer and fewer spaces for students to practice field sports in San Francisco. Treasure Island has closed multiple fields, and the fields that are open have multiple teams competing to use them.

Both my boys play or played football at Saint Ignatius, and it's been a hugely positive part of their lives. We love watching them play as well. I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law. Allowing SI to install these lights will keep students closer to the campus rather than forcing them to travel great distances to practice.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Caitlin Spaan
970 Guerrero St. San Francisco

Caitlin@spaan.com

| | |
|---|---|
| **From:** | Diane Matsumura |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Please vote yes to approve lights at Saint Ignatius Field |
| **Date:** | Wednesday, September 30, 2020 7:12:25 AM |

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September 29, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Stefan or Honorable Supervisors:

My name is Diane Matsumura, and I have lived in San Francisco my whole life, that's all of 59 years. I'm on staff at Alamo Elementary School and the mother of twins that currently attend Saint Ignatius College Prep High School.

I am writing to ask that you support the approval of the installation of lights for the St. Ignatius field which will allow the school a later start time in accordance with CA State law, Allowing SI to install these lights will have a positive impact on our kids by keeping them closer to the campus rather than traveling great distances for practice. Being a school with high academic standards, having practices at school, will give them more time to keep up with their homework as well.

I understand that in July, the San Francisco Planning Commission voted 6 to 1 in favor of the approval for installing lights on the St. Ignatius Field. This process has been in the making for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Diane Matsumura
1223 27th Avenue
San Franciscom CA  94121
di.mats@yahoo.com

**From:** Wendy Morgan
**To:** Mar, Gordon (BOS); Board of Supervisors, (BOS)
**Subject:** Lights at SI - Files No. F200992 and 200996
**Date:** Wednesday, September 30, 2020 7:22:12 AM

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

Dear Supervisor Mar and all Honorable Supervisors:

I am a parent at St. Ignatius College Prep and our son is a student athlete. I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,
Wendy Morgan
morgan.wendys@gmail.com

| | |
|---|---|
| **From:** | Ian Milham |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | RE: Continued support/approval of lights at SI Field (File No. F200992 and 200996) |
| **Date:** | Wednesday, September 30, 2020 8:36:33 AM |

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September 28th, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Yee and Honorable Supervisors:

As you all know, one of the challenges (but also beauties) of San Francisco is how tightly we all live together. We moved here 16 years ago specifically to raise our kids in this environment of diversity and collaboration. One of the things, though, that's harder to come by in the city is space for physical activity, so it makes sense to maximize the use of the space we do have.

I'm writing to ask you to please support the installation of lights at Saint Ignatius' field, which was approved by a 6-1 vote by the SF Planning Commission in July, after a seven year process of approval. Especially during daylight savings time, it gets dark early here in SF, and these lights would allow SI to implement a later start time in accordance with CA state law. Physical activity is so critical for mental health, which we're all being challenged on at this time, and the proper, already approved, lighting would give thousands of kids the opportunity to use a resource that right now sits wasted too much of the time.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Ian Milham

906 Teresita Blvd. SF, CA 94127 (District 7)

ian.a.milham@gmail.com

| | |
|---|---|
| **From:** | Jim Chapman |
| **To:** | Stefani, Catherine (BOS) |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Wednesday, September 30, 2020 8:42:35 AM |

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October 1, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Stefani and Honorable Supervisors:

My name is Jim Chapman and I was born and raised in San Francisco. Not only was I raised in District 2 but I also call District 2 my family home now with my wife and 2 teenage boys. My oldest is a Sophomore student athlete at SI and my younger 8th grader is planning on attending SI in 2021.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Jim Chapman
1849 Lyon Street, SF, CA  94115
jimchapman415@icloud.com

| | |
|---|---|
| **From:** | Jim Chapman |
| **To:** | Stefani, Catherine (BOS) |
| **Cc:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Wednesday, September 30, 2020 8:59:59 AM |

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October 1, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Stefani and Honorable Supervisors:

My name is Jim Chapman and I was born and raised in San Francisco. Not only was I raised in District 2 but I also call District 2 my family home now with my wife and 2 teenage boys. My oldest is a Sophomore student athlete at SI and my younger 8th grader is planning on attending SI in 2021.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Jim Chapman
1849 Lyon Street, SF, CA  94115
jimchapman415@icloud.com

**From:** Emma Stecher "21
**To:** Board of Supervisors, (BOS)
**Subject:** Fwd: City Lights
**Date:** Wednesday, September 30, 2020 10:35:57 AM

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---------- Forwarded message ---------
From: **Emma Stecher '21** <estecher21@siprep.org>
Date: Wed, Sep 30, 2020 at 10:33 AM
Subject: City Lights
To: <gordon.Mar@sfgov.org>, <norman.yee@sfgov.org>, <matt.haney@sfgov.org>, <MandelmanStaff@sfgov.org>, <Aaron.peskin@sfgov.org>, <dean.preston@sfgov.org>, <sandra.fewer@sfgov.org>, <ahsha.safai@sfgov.org>, <hillary.ronen@sfgov.org>, <catherine.stefani@sfgov.org>, <shamann.walton@sfgov.org>, <Board.of.supervisorrs@sfgov.org>

30 September 2020

Dear Supervisor Mar and Members of the San Francisco Board of Supervisors,
My name is Emma Stecher and I am a student-athlete at St. Ignatius College Preparatory School who plays field hockey. I have lived in the city for all of my life in the Outer Sunset/Parkside District. This place really holds a special place in my heart as it is in some parts very urban while in others it offers a natural escape to get away from the hustle of daily activities.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA state law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experiences on the sports field. Even the students who participate as spectators gain a strong sense of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Emma Stecher
2740 41st Avenue
SF, CA 94116
estecher21@siprep.org

| | |
|---|---|
| **From:** | Abigayle F |
| **To:** | Yee, Norman (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Wednesday, September 30, 2020 11:07:09 AM |

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Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Norman Yee,

My name is Abigayle Ferdon. I am a San Francisco native. My husband, Ben Ferdon, is also a San Francisco native. We are raising our two sons in the Lakeside district of San Francisco. My husband is an alumni of St. Ignatius College Preparatory School. Our oldest son is currently a junior at St. Ignatius. He is active in several sports teams and clubs.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

Allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice. It will help continue to build community. Outdoor activity is so important for our children especially now during this pandemic. It allows them to stay healthy both physically and mentally.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

**Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.**

Abigayle & Ben Ferdon

**From:** Mei Mei Chan
**To:** Yee, Norman (BOS); Board of Supervisors, (BOS)
**Subject:** Lights at St. Ignatius Field File No. F200992 and 200996
**Date:** Wednesday, September 30, 2020 12:19:10 PM

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

Dear Supervisor Norman Yee and Members of the San Francisco Board of Supervisors,

This is Donald Luu and Mei Mei Chan, parents of SI students, Shanon Luu (junior) and Nathanael Luu (freshman). We have been living in this district for more than thirty years. My daughter has been playing for SI Lacrosse team for the last two years. Both of my children are athletes who are looking forward be able to participate in school sports programs for this school year.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Donald Luu and Mei Mei Chan

99 Castenada Avenue, San Francisco

Mchan@meiarchitects.com

**From:** Marijoy.Arguelles@everestre.com
**To:** MadelmanStaff@sfgov.org
**Cc:** Yee, Norman (BOS); Haney, Matt (BOS); Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS); nharlan@siprep.org; MLGanzon@aol.com; randolf@arguell.es
**Subject:** Lights at St. Ignatius Field File No. F200992 and 200996
**Date:** Wednesday, September 30, 2020 2:27:03 PM

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September 30, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Supervisor Madelman and other Honorable Supervisors:

As parents of a recent graduate and a new Freshman of St. Ignatius High School, and specifically for Randolf Arguelles - a long-time resident of San Francisco for more than 35 years, an alumni of St. Ignatius High School and a business owner in San Francisco, we are writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Marijoy & Randolf Arguelles
5149 Diamond Heights Blvd.
San Francisco, CA  941431

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| | |
|---|---|
| **From:** | Brian Burnett |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Wednesday, September 30, 2020 3:01:33 PM |

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

Dear Supervisor Fewer and other Honorable Supervisors,

My name is Brian Burnett, I have been a San Francisco resident for over 30 years, and have lived in the Richmond District (15th Ave between California and Clement) for the last 20.

We have raised our children (Jack and Samantha) here, both currently attend St Ignatius College Preparatory. ***We have tried very hard to stay in San Francisco, even as we watched many of our friends flee to the suburbs once they started to raise families*.**

***I'm writing in strong support for the approval of lights at St. Ignatius Field*** in order to create more options for student-athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law. There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

***The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July*** and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

***Please vote YES! to the lights at St. Ignatius Field. Please help keep families like ours in San Francisco.***

***Thanks for your consideration!***

Sincerely,

Brian Burnett
255 15th Ave
San Francisco, CA
415-609-2677

briangburnett@gmail.com

| | |
|---|---|
| **From:** | McFarland, Tessa |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Cc:** | Board of Supervisors, (BOS) |
| **Subject:** | Support for Lights for Sports at St. Ignatius |
| **Date:** | Wednesday, September 30, 2020 4:00:27 PM |

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Dear Supervisor Yee, and Board of Supervisors:

We write in support of lights for the sports field at St. Ignatius. We live in District 7. We've raised three kids in SF, our youngest is a freshman at St. Ignatius. The importance of sports to the development of children into young adults is very well known – it builds character, friendships, teaches discipline and life lessons like how to win and lose with grace, how to manage your emotions when you try your heart out and you still fail. Ultimately, playing sports and being on a team bridges differences, creating unity. These are all so incredibly important, and seems even more important now in America. Lights would allow more time for use of the field, especially in the wintertime and to allow for distancing required by COVID. This is very important to the children and families here in San Francisco. Please support the lights – by doing so, you're supporting kids, families and the greater community.
Thank you,
Tessa & Bill McFarland
480 Castenada Avenue
tmcfarland@prometheusreg.com

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**From:** maria rivieccio
**To:** Ronen, Hillary
**Cc:** Board of Supervisors, (BOS)
**Subject:** Re: Lights at St. Ignatius Field File No. F200992 and 200996
**Date:** Wednesday, September 30, 2020 7:54:43 PM

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September 30, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

**Re: Lights at St. Ignatius Field File No. F200992 and 200996**

Dear Supervisor Hillary Ronen,

My name is Maria Rivieccio, I'm a grand-mother of a student at Saint Ignatius. I have lived in San Francisco, since
I immigrated here in 1969 and specifically in your district for 35 years.

I'm writing in **strong support** for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice. I myself have had to pick up my grandson many times and bring him to a field in Pacifica to practice baseball. It does not seem right to me that these kids can not practice at their own school due to not having lights.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote **YES!** to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Maria Rivieccio
737 Silliman Street
mariarivieccio@sbcglobal.net

| | |
|---|---|
| **From:** | Marnie Nordquist |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Cc:** | Steve Schirle |
| **Subject:** | Lights at SI Field File No. F200992 and 200996 |
| **Date:** | Wednesday, September 30, 2020 7:57:35 PM |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Lights at St. Ignatius Field File No. F200992 and 200996

Dear Honorable Supervisors:

My name is Marnie Nordquist and I have lived, attended law school, and worked in San Francisco since 1985. My husband Steve Schirle and I have lived in Forest Hill Extension (District 7) for over 28 years. Two of our kids are now in college and our third child is a sophomore at St. Ignatius College Prep.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

I played many years in SF softball leagues and tennis leagues, and all of my kids played sports during grammar school, for club teams, and in high school in San Francisco. There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice. My 16 year old currently has some practices at Fairmont Field in Pacifica. There are no convenient bus routes and it's not safe to expect a new teen driver to navigate this route regularly. Installation of these lights will keep our students safer.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Marnie Nordquist

76 Hernandez Ave.
San Francisco, CA 94127
marnienordquist@me.com
(415)370-1466

| | |
|---|---|
| **From:** | Sloan Smith |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Wednesday, September 30, 2020 9:14:42 PM |

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Honorable supervisors,

The purpose of this email is to show my support for the addition of lights at Saint Ignatius field.

The addition of lights allows more opportunities for the student-athletes to utilize the facilities on SI's campus. Having additional opportunities for students to stay on campus and to create bonds and develop school unity are of great benefit---something that is especially apparent during these times.

As a parent of an SI student-athlete who commutes to school each day, I personally appreciate anything that will allow him to stay on campus and to experience every minute of what SI has to offer. I also like that he won't have to travel great distances to limited playing fields to play the sports he loves.

Saint Ignatius has been an excellent institution of learning and service for a long time. Its students, faculty, and alumni value the opportunities to come together to support its sports teams. This process of coming together develops and sustains the idea of 'community'. There will be more opportunities for these encounters with sporting events at night.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by the addition of lights and the positive impact on their SI experience.

Please vote YES! to the lights at St. Ignatius Field.

Thank you.

Sloan Smith
sloansmith72@comcast.net

9/30/2020

| | |
|---|---|
| **From:** | Matthew Asiano "22 |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Wednesday, September 30, 2020 9:28:57 PM |

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Dear Supervisor Catherine Stefani,

My name is Matthew Asiano, I am 16 years old and I have lived in district 2 all of my life. I go to Saint Ignatius where I play football and lacrosse and I am also in troop 14 with your son, Dominic.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

Having lights on the field that I have worked so hard on for the past few years would be so much to me and thousands of others in the Saint Ignatius community. Having these lights would not only highlight football but all sports at Saint Ignatius. With COVID and everything that is going on our community needs something to look forward to in the future.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Matthew Asiano

| | |
|---|---|
| **From:** | Brenda Hunsinger |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Wednesday, September 30, 2020 11:42:56 PM |

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Dear Honorable Supervisors:

I am the parent of a Senior scholar athlete at St. Ignatius College Preparatory. My son has played and practiced football for the last four years on J.B. Murphy Field. The lessons learned on that field have been an instrumental part of his education, growth and character development as a young man for and with others.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes especially during the current circumstances that prioritize the safety of outdoor activities and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students, many of whom already commute, on campus rather than traveling great distances to practices.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Brenda Hunsinger

177 Avenida Miraflores

Tiburon, CA 94920

| | |
|---|---|
| **From:** | Ben Boyden "22 |
| **To:** | Peskin, Aaron (BOS); Safai, Ahsha (BOS); Preston, Dean (BOS); Mar, Gordon (BOS); Ronen, Hillary; MandelmanStaff, [BOS]; Haney, Matt (BOS); Yee, Norman (BOS); Fewer, Sandra (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS); Stefani, Catherine (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Thursday, October 1, 2020 12:35:08 AM |

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Dear Supervisor Stefani and Honorable Supervisors,

I am Ben Boyden, a student at Saint Ignatius. I have lived in the city my whole life and spend a lot of time at SI ever since my sister decided to attend their.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Ben Boyden

2339 Green Street

Bboyden22@siprep.org

| | |
|---|---|
| **From:** | Michael Abendroth |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | File No. F200992 and 200996 St. Ignatius Field Lights |
| **Date:** | Thursday, October 1, 2020 8:12:40 AM |

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Dear Supervisor Yee,

My name is Michael Abendroth, and I have been a resident of San Francisco for 16 years, while living in District 7 for the past 9. Thank you for your service to our neighborhood. I am an alumni of St. Ignatius in the class of 2000. I work at mid-sized bank, serving local and family owned businesses. It is a privilege to witness first hand the positive impacts that these local businesses contribute to our community -- as I am sure you see first hand as well.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law. Even though it is a private school, St. Ignatius students form a very diverse community.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing S.I. to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the generations of students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Michael Abendroth
136 Robinhood Dr.
San Francisco, CA 94127
michaelabendroth@gmail.com

| | |
|---|---|
| **From:** | Josh Shaskan |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Lights at St. Ignatius Field File No. F200992 and 200996 |
| **Date:** | Thursday, October 1, 2020 8:33:21 AM |

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Dear Supervisor Yee and fellow Supervisors,

My name is Josh Shaskan and I have lived in this district since 2005. I am currently a parent at SI and St. Brendan.

I am writing in support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

These are difficult times with Covid-19 and our city is at a crossroads. I see more and more families leaving San Francisco for other communities. Simple things like lights on a field that lesson the burden of shuttling kids from one distant field to the next or create an opportunity for the community to gather to celebrate the great joy of student athletics can keep families in this great city of ours.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experiences on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Josh Shaskan
125 Alton Ave., San Francisco, CA, 94116
jshaskan@gmail.com

Sent from my iPad

| | |
|---|---|
| **From:** | coyllino@yahoo.com |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | YES for Lights at SI Field |
| **Date:** | Thursday, October 1, 2020 10:15:25 AM |

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October 1, 2020

Re: Lights at St. Ignatius Field

Dear Supervisor Yee,

We are writing to support approval of lights at St. Ignatius Field, File No. F200992 and 200996. Our family has lived in the West Portal and Forest Hill neighborhoods of San Francisco for almost 30 years. We feel blessed to have been able to raise our children in such a diverse and vibrant city.

Over the years, we've seen athletic teams increasingly struggle to find practice fields in San Francisco, as many teams and sports all need access to a limited number of fields. Installing lights at St. Ignatius would greatly increase the number of practices that can be held on campus, freeing up city-owned fields for other teams. In addition, lighted fields would vastly improve the academic and athletic experience at St. Ignatius. Currently, practices are often limited to small portions of a field so that multiple teams can practice at the same time in order to get practices in during daylight. This is not a quality athletic experience at any level.

As I'm sure you know, high school sports are an essential part of any educational experience and an important element for many residents of San Francisco. They encourage community, sportsmanship and teamwork both on and off the field. The effects often last a lifetime. Please vote YES for field lights at St. Ignatius and thank you for your consideration.

Sincerely,

Cynthia Coyne and Chris Pollino

85 Marcela Ave

San Francisco CA 94116

coyllino@yahoo.com

**From:** Don Clark
**To:** Board of Supervisors, (BOS); Mar, Gordon (BOS)
**Subject:** Re: Lights at St. Ignatius Field File No. F200992 and 200996
**Date:** Thursday, October 1, 2020 10:45:34 AM

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

Dear Board of Supervisors,

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

Our children have attended SI for 7 years. We love SI. Athletics at SI have played a huge role in our kids lives. In our experience, SI provides tremendous benefits to the Sunset community and beyond, including the positions of the incredible staff, the usage of the facilities including the pool by SF residences, and the economic impact of our meals out before and after games.

Our kids have faced numerous challenges with getting practice time on existing fields. Having lighting installed would help alleviate the shortage of fields.

As you know, the San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Don Clark

| | |
|---|---|
| **From:** | Stephen Wynne |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Cc:** | Board of Supervisors, (BOS) |
| **Subject:** | Lights for the St. Ignatius JB Murphy field - File No. F200992 and 200996 |
| **Date:** | Thursday, October 1, 2020 10:54:15 AM |

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**President Norman Yee and Members of the San Francisco Board of Supervisors**
**City Hall**
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: **Lights for the St. Ignatius JB Murphy - Field File No. F200992 and 200996**

Dear President Norman Yee, Supervisor Catherine Stefani and Honorable Supervisors,

My name is Stephen Wynne and I proudly call myself a Bay Area native… born and raised in Marin County before attending St. Ignatius College Preparatory (Class of 1990). I currently live in District #2 (since 1996) with my wife, Jessica Wynne, and three children - Hunter (16), Webb (14) & Iris (10). Our children love the outdoors and cherish their time on the playing fields.

With the COVID-19 pandemic and the quarantine measures in place, we have come to realize how essential playing outdoor sports is to our children's overall health and well-being. Also, the need for additional outdoor venues (specifically, playing fields with lights) has truly come to light throughout these difficult times. Not only do I speak from the heart, but I also serve as the vice president of the Olympic Club Foundation (OCF) - https://www.olympicclubfoundation.org/. The core mission of the OCF is to support youth athletics in underserved communities within the nine Bay Area counties. So, I speak from experience when I emphasize the importance of athletics toward a young student-athletes' upbringing and overall character building. This beautiful JB Murphy Field at St. Ignatius is used and appreciated during a daytime hours... but sits unused when the sun sets (in the Sunset!).

That said, I'm writing in strong support for approval of lights for the St. Ignatius JB Murphy Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

For 165 years, St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be

impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Thank you for taking the time to read my email. Please vote ‘YES’ to the lights at St. Ignatius JB Murphy Field. Thank you for your consideration.

Sincerely,
Stephen

Stephen Wynne
1824 Baker Street, SF, CA 94115
(415) 608-2611

**From:** Niall Durkin
**To:** Board of Supervisors, (BOS)
**Subject:** Lights at St. Ignatius Field File No. F200992 and 200996
**Date:** Thursday, October 1, 2020 11:29:45 AM

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10/1/2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

**Re: Lights at St. Ignatius Field File No. F200992 and 200996**

Dear Honorable Supervisors,

My daughter is a sophomore at St. Ignatius. We live in Marin, but she loves playing soccer for her school.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer and fewer spaces for students to practice field sports in San Francisco and allowing SI to install these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and excel academically but to be in service to others. Many of those lessons are learned through the shared experience on the sports field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

The San Francisco Planning Commission voted 6 to 1 in favor of this approval in July and the process has been underway for over seven years. Please consider the students who will be impacted by this addition to our field sports program and the impacts it will have on the positive development of young lives.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Niall Durkin

ndurkin@tbdconsultants.com

tbd consultants

***more value, less risk***

SAN FRANCISCO | SAN DIEGO | LOS ANGELES | SEATTLE | SACRAMENTO | LOS ALTOS | DUBLIN (Europe)

**Niall Durkin**
**Principal**
111 Pine Street, Suite 1315
San Francisco, CA, 94111
www.tbdconsultants.com
Tel : 415 981 9430 San Francisco office
Direct : 415 872 0992
Cell : 415 359 5207

**From:** -r b-
**To:** Board of Supervisors, (BOS)
**Subject:** 2018-012648PRJ, 2018-012648APL-02 Stadium Lights at S.I.
**Date:** Thursday, September 17, 2020 12:31:30 PM

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

Board of Supervisors,

I am disheartened to learn that you have approved the New Stadium Lights at St. Ignatius College Preparatory.
I live one and a half blocks from the school and I know that most of my neighbors are very much opposed to this project. This project will change our residential neighborhood from a restful neighborhood will little night time activity to something more akin to a business neighborhood that operates evenings half of the calendar nights a year.
How can you make such drastic changes and go against the vast majority of constituents who are affected most by it?
It is a residential neighborhood that now sees its one for profit business about to make huge sums of money while the neighbors assume all the liability and zero benefit.
Must I remind you that the school has tennis courts and a swimming pool that are NOT available to the neighbors. Now we will have light and noise pollution, parking issues and absolutely no benefit to us.

This is the current state of Democracy for the wealthy. I am disappointed in you.

I want to be the person my dog thinks I am. That's the way I like it.

| | |
|---|---|
| **From:** | Dave Crosby |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunset neighbors |
| **Cc:** | Christine Crosby |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Thursday, September 17, 2020 1:55:37 PM |

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September, 2020

I understand the deadline for submission of this letter was noon today, I humbly request that you consider my letter despite arriving after this prespecified deadline.

Dear Mr. Mar and Members of the SF Board of Supervisors,
I live in the Sunset District near St. Ignatius College Preparatory.
I am a taxpayer and a voter.
I am also an alumnus of St. Ignatius. I am not opposed to the school or its core mission of education and service; however, I am opposed to their plan to light their main field and hold 150 or more-night events.

That field is not surrounded by public lands like Balboa Park, nor a parkland like Beach Chalet fields is surrounded by GGP and Ocean Beach. The field they want to illuminate to a professional level and utilize into the night is bounded by my residential family neighborhood - it is closely bordered by the homes in which we live.

They want 90-foot-tall light standards with huge light arrays in a residential neighborhood with single family, 2 story houses, and height limits.
These night events will overrun our neighborhood with cars parking, double parking, sometimes reckless driving, all bringing teens and adults from beyond our neighborhood and even beyond San Francisco.

They want to do all this for 150 or more nights a year.

No other high school in the City does this. No other school is having a problem scheduling all of their teams without night events.
No public school is determined to make a profit by renting private event space to "affiliates" by linking these other private institutions to themselves by assigning an employee to work for both.
Beyond all of the resulting disruption and disregard for Sunset residents will be the construction trucks, supplies, noise and dirt, shaking due to pilings, and more.

We have direct experience when St. Ignatius has rented night lights in the past and are very much aware of the impacts due to their night events.

Please, as representatives of the residents of San Francisco, please stop the SI project to light and use their football field at Rivera St and 39th Avenue 150+ nights per year.

Please keep the Sunset District a residential family neighborhood.

Thank you for your time and consideration
David Crosby, Ph.D.
2186 36th Avenue San Francisco CA 94116

**From:** Eugene Llamera
**To:** Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com
**Subject:** Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648
**Date:** Thursday, September 17, 2020 4:47:50 PM

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

September 17, 2020

Dear Mr. Mar and Members of the SF Board of Supervisors,

I am a homeowner on 39th Avenue, ½ a block from Saint Ignatius (SI) field. I am a SF taxpayer and voter.
My letter is lengthy but presents a strong case against the proposed lighting and playing schedules at SI.

Are the both sides of the SI renovations talking about the same thing?
During the planning committee hearing, both sides of the issue clearly had a parallel conversation. The SI alumni, students and supporter talked about how sports are beneficial. On the other hand, the neighborhood homeowners talked about how the lights, noise, traffic, and crowd will negatively affect their lives. Please clearly understand that the conversation should be focused on the proposed changes to the lights and field use. SI sports are *not* being cancelled. SI students and parents can still enjoy their sports without being an **intrusive** neighbor by keeping their current lighting situation and by ending the games before our young children need to sleep.

Are 90 ft lights needed to play sports?
SI alumni students and parents spoke of the great experiences thru SI sports. Seriously consider that their experiences happened with the *current* lighting and playing schedule. Their testimony clearly show that lives were made better without the **pollution** from proposed 90 ft lights. Their numerous successes are obvious, bright proof that the **90 ft lights are not important**. While SI supporters' stories pull on the heart strings, they pull away the topic of how **selfish** the 90 ft lights and late schedule will make SI appear. Future successes will still be fostered in the current lighting and playing schedule.

Would you be pleased if your neighbor Bob and Karen (fictional, of course) have their child practice at 10PM?
Imagine for a moment, Bob and Karen have four beautiful children. Three of them are having great successes in sports, leading to full scholarships to top colleges. Bob Jr, the last child, is also having a good but less spectacular career than his siblings. Bob and Karen want the same success for the last child. They decided to add flood lights to their backyard and create a practice schedule to allow Bob Jr to practice up to 10 PM. Take a moment: put yourself next door to Bob and Karen. As their neighbor, you want to feel for Bob Jr while you hear him practicing basketball at 10PM just a few feet from your child's bedroom. Would you be happy to allow a ball bouncing loudly and smack repeatedly into the backboard with bright lights? Or would you be furious that your 2 year old and/or 4 year old cannot sleep and are now crying because of Bob Jr's aspirations for a sports scholarship? Now, replace Bob and Karen with SI.

Why are SI supporters only focusing on the light issue? Why haven't they discussed the late night noise?
A learned caller had offered proof that 90' lights will not necessarily garner any complaints by citing the Beach Chalet soccer field lights. This comparison falls on the ridiculous since the Beach Chalet lights are hundreds of feet from any homes and since the Safeway grocery does not house any young children that need to sleep at 8 or 9 o'clock. If the coyotes are interviewed, they will most likely complain about the lights. The Beach Chalet soccer fields is a non-comparison as SI is only a few ft from homes and has bigger, noisier crowds than Beach Chalet fields. SI supporters are willing to discuss the lights because it is the 'easier' of the two concerns to address. They cannot combat the concern of the **deafening noise** the crowd and sound (PA) system will create. By filling up the conversation about lighting, SI supporters conveniently divert our attention that between noise and light, the **noise is a more disruptive** issue. I live ½ a block from SI and I can clearly l hear the current PA and crowd with our bedroom windows closed; my son will not be able to sleep at 8:30P if the SI is allowed to use the fields until 10PM. The noise from the late game/practice schedule will be more **harmful** to our quality of life. Are you going to allow SI to distract you from a more disruptive issue of noise?

Is the neighborhood anti-sport? Lacks the vision to see the benefits of sports?
As a parent, I fully embrace sports. For over 5 years, we have taken my boy up to 5 days a week to Hapkido, martials arts

training. Now I am rewarded with a 12 y.o. old black belt. Next step will be 2nd degree black belt. In concurrence with martial arts training, my boy plays competitive sports: basketball, baseball, football and soccer. No breaks. When COVID forced him to practice with his basketball team through only thru zoom, I would play one-on-one immediately after I get home so he wouldn't lose his competitive edge. Though I am taller than him and foul him liberally, I win as much as the Washington Generals against the Harlem Globetrotters, damaging my ego in the process. Still I coaxed him to play against me again and again. While sports have an incalculable benefit to a growing person, I will never place sports above the well-being of my neighbors. Having SI play sports up to 10PM will be the same as if I had my child practice basketball until 10 PM in my backyard, making SI and I **inconsiderate** neighbors to the house adjacent to me where a 2 and 4 year old live and need to sleep well before 10PM.

Is SI being honest that the changes will be beneficial to the neighborhood?
SI's claim reminds of an email we all may have received from a nigerian prince who wanted us a wire over money to cover a money transfer. Vigorously the prince claims that we will get more money than we will send. Like this internet scam, the lights and late schedule will benefit only SI, not the neighborhood, by renting out its field to various sports groups in the bay area, and by receiving money from Verizon. The claim that the changes (are for the kids) is a rouse similar to how Southern Ocean whalers fought for years to justify their killing of whales is in the name of scientific research. The whalers vigorously defended their claim until the International Court of Justice ruled in 2014 that the whalers were killing whales to sell whale meat rather than research. The SI changes are largely, if not purely, about money. Would you allow SI to become a "nigerian prince"? Would you allow SI to be another 'whaler'?

Is having later practice the only solution to promoting more sleep to the athletes?
SI supporters have stated that the late evening process will be beneficial to their athletes' sleep (please refer above for how this is not beneficial to the neighborhood children and adults). The reasoning behind with having the students practice late into the night so they have "better" sleep is faulty. This reasoning is like someone holding a very hot cup of water in the left hand; so the left hand is not burnt, the person transfers the cup to the right hand – still continuing to burn a hand. Having the students practice/play later just means they will be sleeping later because the added time it takes to pack their gear, get home, showered and eat/snack. Medical studies repeatedly show that that evening exercise leads to delayed sleep (https://www.health.harvard.edu/staying-healthy/does-exercising-at-night-affect-sleep

Does exercising at night affect sleep? - Harvard Health

Q. I have heard that you should not exercise at night because it can cause sleep problems. Is this true? A. Traditionally, experts have recommended not exercising at night as part of good sleep hygiene. Now a new study, published Oct. 29, 2018, in Sports Medicine, suggests that you can exercise in the evening as long as you avoid vigorous activity for at least one hour before bedtime.

www.health.harvard.edu

The most effective solution is to sleep on time or, in case of an early game, sleep earlier. If my son has an early game (especially if it was out of town) or is hitting the ski runs early, he sleeps at 8PM rather than 8:30PM (even though his friends are still up). Extending the practice late into the night continues the sleep deprivation, if not **worsens** it. Would you allow SI to make changes that keep or worsen the athletes sleep issue?

If the answer to any of the questions above is "no", then the proposed SI changes must not be approved. In the IT world, there is a saying that goes something like, "beware that the current solution will be the next problem." The proposed SI changes will be the **next problem**. The SI changes will **harmful** to its neighbors and has **no benefits** to the SI athletes, and so should not be approved.

Thank you for your consideration,

Eugene Llamera
Father of a 12 y.o. at APG

2250 39th Avenue

SF, CA 94116

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|---|---|
| **From:** | Ken Johnson |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Lights at JB Murphy Field at St. Ignatius |
| **Date:** | Thursday, September 17, 2020 6:12:01 PM |
| **Attachments:** | 5.15.20 - Ken Johnson.docx |

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

Please find attached my May letter endorsing the installation of lights at JB Murphy Field at St. Ignatius.
Regards,
Ken Johnson
2126 Ulloa St.
SF, 94116

From: **Ken Johnson** <kenj630@gmail.com>
Date: Fri, May 15, 2020 at 6:16 PM
Subject: SI Lights
To: <joel.koppel@sfgov.org>, <kathrin.moore@sfgov.org>, <sue.diamond@sfgov.org>, <frank.fung@sfgov.org>, <theresa.imperial@sfgov.org>, <milicent.johnson@sfgov.org>, <jonas.ionin@sfgov.org>, <commissions.secretary@sfgov. org>

5/15/2020

President Joel Koppel and
Honorable Commissioners San
Francisco Planning Commission
San Francisco City Hall

**VIA EMAIL**

Re: Lights at St. Ignatius Field

Dear Commissioners:

My name is Ken Johnson, a 30 year resident of the Sunset District and parent of a former St. Ignatius student athlete and a strong advocate for providing any and all opportunities for high school students to participate in sports, if they are so inclined, as part of their high school experience.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.

There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and get good grades but to be in service to others. Many of those lessons are learned through the shared experience on the field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Ken Johnson
2126 Ulloa St. S.F. 94116
kenj630@gmail.com

| | |
|---|---|
| **From:** | Gustavo Manzanares |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | File No. 200992 and 200996 |
| **Date:** | Friday, September 18, 2020 11:47:16 AM |
| **Attachments:** | FieldLightsLetter.docx |

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

Please see attached letter regarding field lights at St.Ignatius College Preparatory.

Warm regards,

--

Gustavo Manzanares, *MCM*
Defensive Coordinator
Associate Director of Athletics
St. Ignatius College Preparatory
2001 37th Avenue
San Francisco, CA 94116
www.siprep.org
Go 'Cats!

Dear Commissioners:

My name is Gustavo Manzanares and I am an Alumni of St. Ignatius. I have been part of the St. Ignatius Sunset Community for the past 20 years.

I'm writing in strong support for approval of lights at St. Ignatius Field. Flexible time management possibilities that allow different students and programs the opportunity to create a strong structure for the day play an advantageous role in developing high level intellectual, emotional, and physical attributes in students. Adding lights at SI would assist in achieving this goal by opening up more options in a day for more effective planning and scheduling to serve student-athletes. This would lead to a more robust and diverse amount of opportunities to enhance learning and the SI student experience.

There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the campus rather than traveling great distances to practice and extending an already long and demanding day.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and get good grades but to be in service to others in areas of emotional and social development. Many of those lessons are learned through the shared experience on the athletic field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Gustavo Manzanares
287 South Hill Blvd. San Francisco CA
Gustavomanzanares@gmail.com

| | |
|---|---|
| **From:** | Kathleen Carouba |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Re: File No. 200992 and 200996 |
| **Date:** | Friday, September 18, 2020 12:22:37 PM |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: File No. 200992 and 200996

**VIA EMAIL**

Re: Lights at St. Ignatius Field

Dear Commissioners:

My name is Kathleen Carouba and I am a 1st generation, native San Franciscan. I have lived in the sunset district for over 50 years. My son graduated from St. Ignatius in 1983 and was actively involved in their athletics program. I have many memories of attending football games at SI. I also have two granddaughters who are currently enrolled in school in San Francisco and who are looking forward to attending SI.

It is so important to have a space where students can safely get together and build community, not only for themselves, but the neighborhood as well. It just makes good sense. There are not enough practice fields in San Francisco and it would be much safer for the students to practice on their home field. These lights will create more options for all students and allow St. Ignatius to implement a later start time in accordance with California State law.

With proper guidelines and the involvement of the entire community, this will be a very worthwhile achievement.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Kathleen Carouba

3065 24th Avenue

San Francisco, CA 94132
kcarouba@yahoo.com

| | |
|---|---|
| **From:** | Michael Sweeney |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Lights at St Ignatius field |
| **Date:** | Friday, September 18, 2020 9:50:11 PM |

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

To the Board of Supervisors:
I am writing to you in support of lights for the sports field at St Ignatius College Preparatory. I am a native and current resident of the Sunset District. I am also a practicing attorney with an office in the nearby West Portal neighborhood for the last 20 years.
As a graduate of St Anne's elementary school, St Ignatius, the University of California at Berkeley and the University of California - Hastings College of the Law, I am 100% the product of local schools, and, as such, know the tremendous importance of recreational opportunities for young people growing up in an urban environment like San Francisco. As you know, San Francisco has the lowest percentage of children among the Bay Area counties and one of the lowest percentages among all U.S. cities. Anything that can be done to expand the recreational opportunities for youth in San Francisco should be a high priority for the Planning Commission.
As a graduate of St Ignatius, I know what a good partner the school has been for the Sunset District and for the larger San Francisco community over the past half century. I can recall the school hosting Special Olympics events in its sports facilities when I was a student there in the 1980s. As the uncle of a 12-year-old San Franciscan, I am also aware of the large extent to which St Ignatius makes its sport facilities available to K-8 students from the neighborhood for various tournaments and practices. Allowing lights and evening sporting events will only expand such opportunities.
Sincerely,
Michael T. Sweeney
1527 32nd Avenue
San Francisco
tel. 415-317-9878

| | |
|---|---|
| **From:** | Giancarlo Loeffler |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | St. Ignatius - Lights at Field (File No. 200992 and 200996) |
| **Date:** | Saturday, September 19, 2020 9:31:40 AM |

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

Good Morning Mr. Yee and Members of the San Francisco Board of Supervisors,
My name is Giancarlo Loeffler. I've lived in San Francisco my entire life and graduated from St. Ignatius in 2001. I was raised in the Richmond District, but have lived in the Sunset District since 2006.

I'm writing to you today in support of approval of the installation of lights at St. Ignatius Field in order to create more options for student athletes as well as to allow for the school to implement a later start time in accordance to California State Law.

As you know, there are fewer spaces for students to practice field sports in San Francisco. Allowing SI to build these lights will allow students to remain closer for practice and not force them to travel significant distances just to be able to practice.

St. Ignatius has been an excellent center of learning and has encouraged students to serve others. Many of these important lessons are learned through team sports and the sharing of these experience on the field. A sense of community and togetherness is even instilled with fellow students who participate by spectating and encouraging their classmates.

Please vote YES to the lights at St Ignatius field. Thank you for your consideration.--
Giancarlo

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|---|---|
| **From:** | Jeannie Quesada |
| **To:** | Yee, Norman (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Hilary.Ronen@sfgov.org; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | File No. 200992 and 200996 -- Lights at St. Ignatius Field |
| **Date:** | Monday, September 21, 2020 9:35:51 AM |

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September 20, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CVA 94102-4689

Re: File No. 200992 and 200996 -- Lights at St. Ignatius Field

Dear Members of the San Francisco Board of Supervisors:

My name is Jeannie Quesada. I am a lifelong resident of San Francisco and a 30-year resident of the Sunset District. My husband, Richard, a city native, and I raised three children in the neighborhood. All three children graduated from St. Ignatius College Preparatory. We also have two grandchildren living in the Sunset District.

We are writing to strongly support the approval of lights at St. Ignatius Field. We believe lighting the Field will allow for more options for students and SI to implement a later start time for school as per California State law. Because there are fewer facilities to practice field sports in San Francisco, lights at SI will keep students on campus instead of them having to travel long distances to practice.

St. Ignatius College Preparatory has a long history of service to San Francisco, our community, and educating our youth. Allowing SI to light the Field will help create a strong feeling of community for students, athletes, families, and neighbors.

Please vote "YES" to approve the lighting of St. Ignatius Field. Thank you.

Sincerely,

Jeannie & Richard Quesada
2639 - 24th Avenue
San Francisco, CA 94116
jquesada516@gmail.com

| | |
|---|---|
| **From:** | Bill Moore |
| **To:** | Yee, Norman (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS) |
| **Subject:** | Re: File No. 200992 and 200996 (Lighting project St. Ignatius) |
| **Date:** | Monday, September 21, 2020 12:23:07 PM |

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

Dear President Norman Yee and Members of the San Francisco Board of Supervisors,

My name is William Moore and my wife is Francesca Felizzatto Moore, we are Sunset District residents who live within a couple blocks of St. Ignatius College Prep (Santiago Street).
I currently have a daughter that is a senior, as well as a newly admitted freshman daughter - both "wildcats" of St. Ignatius.

I'm writing to you in an effort to show support for approval of lights at St. Ignatius Field. Even before my children attended this school, I felt the camaraderie of the athletic programs, the healthiness of extracurricular activities and the "sunset spirit" excluded from this location. We would often sit in the backyard on weekends and listen to announced games, and events bellowing from the campus. Adding lights will only help create a more communal environment and instill healthy competition. Moreover, the ability to illuminate the field will create more options for student athletes and also allow St. Ignatius to implement a better schedule for students by playing games or attending events in the evening.

Furthermore, I'd rather see the kids of St. Ignatius be able to play at their schools opposed to traveling long distances. In this new (post Covid) environment, having a designated area, controlled by an institution we can count on to be socially responsible is paramount today.

Finally, St. Ignatius College Preparatory has always been a learning institution that has brought the best out of young adults. They instill giving back to others and have always treated the residents of the Sunset District with generosity, integrity and with humility. The addition of lights around their field will only enhance that opposed to impeding on it. Most of the lessons taught happen on those fields through coaching, and team building events. While not all students play sports and not every sport is played on these fields, the events that do happen there, and the few that happen in the evening would only help those attendees feel a stronger sense of community - especially by supporting colleagues, friends and strangers!.

Please vote YES! to the lights at St. Ignatius Field, we appreciate your leadership and willingness to be open to the advantages this has for everyone, when brought on responsibly. Thank you for your consideration.

Sincerely,

Bill and Francesca Moore

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photo

**Bill Moore**
Director, Sales | Contract Wrangler | *You Signed Your Contract, Now What?*

**O** +1 (415) 690-0316 **E** bill.moore@contractwrangler.com
**W** www.contractwrangler.com

| | |
|---|---|
| **From:** | Paul Albritton |
| **To:** | Board of Supervisors, (BOS) |
| **Cc:** | BOS Legislation, (BOS); SANDERS, WILLIAM (CAT); Wong, Jocelyn (BOS); Horn, Jeffrey (CPC); Storrs, Bruce (DPW); Tse, Bernie (DPW); Duran, Vanessa (DPW); PEARSON, ANNE (CAT); Hillis, Rich (CPC); Wong, Jason (DPW); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); Jain, Devyani (CPC); Rivera, Javier (DPW); RUIZ-ESQUIDE, ANDREA (CAT); Gibson, Lisa (CPC); Rodgers, AnMarie (CPC); BOS-Legislative Aides; BOS-Supervisors; Longaway, Alec (BOA); Sullivan, Katy (BOA); Rosenberg, Julie (BOA); Omokaro, Ify (MTA); Starr, Aaron (CPC); Sider, Dan (CPC); Sanchez, Scott (CPC); Teague, Corey (CPC); Navarrete, Joy (CPC); Varat, Adam (CPC); Calvillo, Angela (BOS); Mchugh, Eileen (BOS); Somera, Alisa (BOS) |
| **Subject:** | Items 75 - 82: Verizon Wireless Appeal Response SF BOS Agenda September 22, 2020 |
| **Date:** | Tuesday, September 22, 2020 11:38:23 AM |
| **Attachments:** | Verizon Wireless Letter 09.22.20.pdf |

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

Please find attached Verizon Wireless's response opposing the appeal of the Planning Commission approved Collocated Telecommunications Facility at 2001 37th Avenue.

Thank you for your careful consideration of this correspondence.

Paul

Paul Albritton
Mackenzie & Albritton, LLP
155 Sansome Street, Suite 800
San Francisco, California  94104
(415) 288-4000

**MACKENZIE & ALBRITTON LLP**
155 SANSOME STREET, SUITE 800
SAN FRANCISCO, CALIFORNIA 94104

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September 22, 2020

**VIA EMAIL**

President Norman Yee
Supervisors Sandra Lee Fewer,
Catherine Stefani, Aaron Peskin,
Gordon Mar, Dean Preston, Matt Haney,
Rafael Mandelman, Hillary Ronen,
Shamann Walton, and Ahsha Safai
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
San Francisco, California 94102

Re: Verizon Wireless Response to Appeal
Collocated Telecommunications Facility, 2001 37th Avenue
(St. Ignatius College Preparatory)
Board of Supervisors Agenda, September 22, 2020

Dear President Yee and Supervisors:

We write on behalf of Verizon Wireless to ask that you uphold the approval of the Planning Commission and deny the appeal filed by the Saint Ignatius Neighborhood Association ("Appellant") of a wireless facility collocated on proposed new stadium lighting at the St. Ignatius College Preparatory school (the "Approved Facility"). Verizon Wireless designed the Approved Facility to provide needed service with minimal impact. As confirmed by the Planning Commission, the Approved Facility meets all findings for approval under San Francisco's Code (the "Code"). Appellant does not present any substantial evidence to warrant denial of the Approved Facility. Further, because the Approved Facility will fill a significant gap in Verizon Wireless service, and there is no less intrusive alternative, denial would violate the federal Telecommunications Act. We urge you to reject the appeal and approve the Approved Facility.

## I. The Project

St. Ignatius College Preparatory school has proposed to add four 90-foot stadium lights to an existing field stadium at its private secondary school. The Approved Facility has been thoughtfully designed to minimize any impact by locating on the northwest light standard. Verizon Wireless proposes to place nine panel antennas, three integrated radio antenna units, six remote radio units, two surge suppressors, and ancillary equipment

within a 12-foot by 28-foot fenced area located on the ground, adjacent to the light standard.

Photosimulations of the Approved Facility are attached as Exhibit A. A report prepared by third-party consulting engineers, attached as Exhibit B, confirms that radio frequency ("RF") exposure from the Approved Facility will fully comply with Federal Communications Commission ("FCC") guidelines.

## II. The Approved Facility Satisfies All Findings For A Special Use Permit.

As confirmed by the Planning Commission's approval, the Approved Facility meets all requirements for approval of a conditional use authorization, including the Planning Department's Wireless Telecommunications Services Facilities Siting Guidelines (the "WTS Guidelines"), as detailed by the Planning Commission. Notably, the Approved Facility will not be detrimental to public health, safety or welfare, because radio frequency emissions will fall well under FCC exposure guidelines, and the facility will not be accessible to the public.

The Approved Facility satisfies all development standards, including the location preferences in the WTS Guidelines. WTS Guidelines, §8.1. The WTS Guidelines establish five categories of preferred location sites, and the Approved Facility qualifies for the two most preferred locations. The first location, "publicly-used structures," includes "[w] here the installation complies with all FCC regulations and standards, schools, hospitals, health centers, places of worship, or other institutional structures. . . ." WTS Guidelines, §8.1.1. Here, the Approved Facility complies with all FCC regulations and standards, as established by the third-party engineer's report and also because it is located at a school. San Francisco's Department of Public Health have reviewed this report and independently approved it. Exhibit C.

The second location preference, "co-location site," is for "[a]ny existing site on which a legal wireless telecommunications facility is currently located shall be a Preferred Location Site regardless of the underlying zoning designation of the site. . . ." WTS Guidelines, §8.1.2. Both AT&T Mobility and T-Mobile have wireless facilities on the three-story classroom building about 490 feet to the northeast of the Approved Facility at the school.

There will be no impact to views, as the Approved Facility will be located on the school's proposed light standards. The Approved Facility will not increase the height of the lights and will use its existing infrastructure. The Approved Facility is necessary and desirable because it will improve wireless connectivity for residents, visitors, and emergency personnel, with minimal impact on the neighborhood.

In sum, the Approved Facility satisfies all requirements for approval.

## III. Verizon Wireless Has Presented Substantial Evidence For Approval, And Appellant Presents No Substantial Evidence To Warrant Denial

Under the federal Telecommunications Act, a local government's denial of a wireless facility application must be based on "substantial evidence." *See* 47 U.S.C. § 332(c)(7)(B)(iii). A denial of an application must be based on requirements set forth in the local code and supported by evidence in the record. *See Metro PCS, Inc. v. City and County of San Francisco,* 400 F.3d 715, 725 (9th Cir. 2005) (denial of application must be "authorized by applicable local regulations and supported by a reasonable amount of evidence"). While a local government may regulate the placement of wireless facilities based on aesthetics, mere generalized concerns or opinions about aesthetics or compatibility with a neighborhood do not constitute substantial evidence upon which a local government could deny a permit. *See City of Rancho Palos Verdes v. Abrams* (2002) 101 Cal. App. 4th 367, 381.

As set forth above, Verizon Wireless has provided substantial evidence to show that the Approved Facility complies with all requirements for approval under the Code. Among other evidence, photosimulations demonstrate the minimal impact of Verizon Wireless's collocated antennas, painted to match. The submitted reports confirm that radio frequency exposure will comply with FCC guidelines, and noise emissions comply with City limits.

In contrast, Appellant has provided no evidence – let alone the substantial evidence required by federal law – to support denial of the Approved Facility. Appellant presents no evidence to contradict the Planning Commission's findings for approval. We respond to Appellant's various grounds for appeal below.

## IV. The Planning Commission Properly Determined That The Approved Facility Is Exempt From CEQA

Appellant challenges the Planning Commission's exemption of the Approved Facility from the California Environmental Quality Act (Pub. Res. Code §§21000-21189.3) ("CEQA") and the Guidelines for Implementation of the California Environmental Quality Act (14 Cal. Code Regs. §§15000-15387) ("CEQA Guidelines"). The Approved Facility qualifies for a Class 3 categorical exemption, which applies to new construction of small facilities or structures. 14 Cal. Code Regs. §15303. Courts have consistently upheld the application of the Class 3 exemption to a wide variety of wireless and telecommunications projects. *See Don't Cell Our Parks v. City of San Diego* (2018) 21 Cal.App.5th 338 (faux tree telecommunications pole in public park); *Aptos Residents Ass'n v. County of Santa Cruz* (2018) 20 Cal.App.5th 1039 (10 microcell transmitter units on existing utility poles); *Robinson v. City and County of San Francisco* (2012) 208 Cal.App.4th 950 (40 wireless equipment cabinets on existing utility poles); *San Francisco Beautiful v. City and County of San Francisco* (2014) 226 Cal.App.4th 1012 (726 new utility cabinets on public sidewalks).

The CEQA Guidelines provide examples of the Class 3 exemption, including multi-family residential structures; a store, motel, office, restaurant or similar structure not exceeding 2,500 square feet in floor area; and in urbanized areas, up to four commercial buildings, not exceeding 10,000 square feet in floor area. 14 Cal. Code Regs. §15303. The Approved Facility has a much smaller footprint than these examples, with only a 336-square foot equipment enclosure and minimal equipment attached to a stadium light standard.

Finally, Appellant claims that exceptions to the Class 3 exemption preclude its use. 14 Cal. Code Regs. §15300.2. However, Appellant has not contended that any of these exceptions apply to the Approved Facility.

In sum, Appellant raises no grounds for appeal that constitute substantial evidence to deny the Approved Facility. In contrast, Verizon Wireless has provided ample evidence that the Approved Facility complies with all City requirements. The appeal must be rejected.

## IV. The Appeal Must Be Denied To Avoid An Unlawful Prohibition Of Service

A local government's denial of a permit for a wireless facility violates the "effective prohibition" clause of the federal Telecommunications Act if the wireless provider can show two things: (1) that it has a "significant gap" in service; and (2) that the proposed facility is the "least intrusive means," in relation to the land use values embodied in local regulations, to address the gap. *See T-Mobile USA, Inc. v. City of Anacortes,* 572 F.3d 987 (9th Cir. 2009).

If a provider proves both elements, the local government *must* approve the facility, even if there is substantial evidence to deny the permit under local land use provisions (which there is not in this case). This is because the provider has met the requirements for federal preemption; i.e., denial of the permit would "have the effect of prohibiting the provision of personal wireless services." 47 U.S.C. § 332(c)(7)(B)(1)(ii); *T-Mobile v. Anacortes,* 572 F.3d at 999. To avoid such preemption, the local government must show that another alternative is available, technologically feasible, and less intrusive than the proposed facility. *T-Mobile v. Anacortes*, 572 F.3d at 998-999.

### A. Verizon Wireless Has Demonstrated a Significant Gap in Service.

Verizon Wireless has identified a significant gap in its LTE service coverage in the area surrounding the St. Ignatius school in the Sunset District. Verizon Wireless's small cell facilities in the greater vicinity are too distant to serve the gap. The significant gap is described in the coverage maps, attached as Exhibit D. The existing coverage map shows a lack in-building LTE coverage on nearby school properties and the residential neighborhoods to the west and south. There is a lack of in-vehicle coverage along local roads to the west, north and east, and along a 0.6-mile stretch of major thoroughfare Sunset Boulevard to the east. The proposed coverage map shows that the Approved Facility will provide reliable new in-building coverage to the school properties and

residential neighborhoods, as well as new in-vehicle coverage to local roadways and Sunset Boulevard.

A third-party engineering firm, approved by the City, independently verified this gap by reviewing the maps and conducting their own drive test, attached as Exhibit E. They concluded that "Based on the measurement data, we conclude that the Verizon 4G LTE coverage map showing the service area without the proposed installation includes areas of relatively weak signal levels in the carrier's present coverage."

### B. The Approved Facility is the Least Intrusive Means To Fill the Significant Gap in Service.

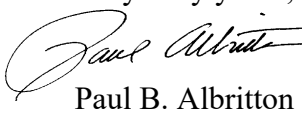
In an effort to address the significant gap, Verizon Wireless searched for a site that qualified for the WTS Guidelines' Code's top two preferences for wireless facility placement.

In short, Verizon Wireless has identified a significant gap in coverage and has shown that the Approved Facility is the least intrusive means to address it, based on the values expressed in City regulations. Under these circumstances, Verizon Wireless has established that denial of the Approved Facility would constitute an unlawful prohibition of service.

## V. Conclusion

Verizon Wireless has worked diligently to identify the ideal location and design for a new facility to serve the south Monterey area. As confirmed by the Planning Commission, the Approved Facility meets all findings for approval under the Code. Appellant raises no substantial evidence to contradict this approval. Ensuring reliable Verizon Wireless service in Monterey is critical to residents and visitors as well as emergency service personnel. We strongly encourage you to affirm the Planning Commission's approval, and to deny the appeal.

Very truly yours,



Paul B. Albritton

cc: Jeff Horn
Bill Sanders
Jocelyn Wong

**Schedule of Exhibits**

Exhibit A: Photosimulations
Exhibit B: Radio Frequency Exposure Report by Hammett & Edison, Inc.
Exhibit C: DPH Approval
Exhibit D: Engineering Necessity Case
Exhibit E: Hammett & Edison, Inc. Peer Review of Necessity

# Exhibit A

verizon

**Sunset & Noriega Site # 255926**

Looking Southeast from 39th Ave.

2001 37th Ave.
San Francisco, CA

View #1

2/6/20

insight photosim (707) 315-1585

verizon

**Sunset & Noriega Site # 255926**

Looking Northeast from 39th Ave.

2001 37th Ave.
San Francisco, CA

2/6/20

View #2

insight photosim (707) 315-1585

**Exhibit B**

## Statement of Hammett & Edison, Inc., Consulting Engineers

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained on behalf of Verizon Wireless, a personal wireless telecommunications carrier, to evaluate the base station (Site No. 255926 "Sunset & Noriega") proposed to be located at 2001 37th Avenue in San Francisco, California, for compliance with appropriate guidelines limiting human exposure to radio frequency ("RF") electromagnetic fields.

## Background

The San Francisco Department of Public Health has adopted an 11-point checklist for determining compliance of proposed WTS facilities or proposed modifications to such facilities with prevailing safety standards. The acceptable exposure limits set by the FCC are shown in Figure 1. The most restrictive limit for exposures of unlimited duration at several wireless service bands are as follows:

| Wireless Service Band | Transmit Frequency | "Uncontrolled" Public Limit | Occupational Limit (5 times Public) |
|---|---|---|---|
| Microwave (point-to-point) | 1–80 GHz | 1.0 mW/cm$^2$ | 5.0 mW/cm$^2$ |
| Millimeter-wave | 24–47 | 1.0 | 5.0 |
| Part 15 (WiFi & other unlicensed) | 2–6 | 1.0 | 5.0 |
| CBRS (Citizens Broadband Radio) | 3,550 MHz | 1.0 | 5.0 |
| BRS (Broadband Radio) | 2,490 | 1.0 | 5.0 |
| WCS (Wireless Communication) | 2,305 | 1.0 | 5.0 |
| AWS (Advanced Wireless) | 2,110 | 1.0 | 5.0 |
| PCS (Personal Communication) | 1,930 | 1.0 | 5.0 |
| Cellular | 869 | 0.58 | 2.9 |
| SMR (Specialized Mobile Radio) | 854 | 0.57 | 2.85 |
| 700 MHz | 716 | 0.48 | 2.4 |
| 600 MHz | 617 | 0.41 | 2.05 |
| [most restrictive frequency range] | 30–300 | 0.20 | 1.0 |

## Checklist

Reference has been made to information provided by Verizon, including zoning drawings by Streamline Engineering and Design, Inc., dated April 16, 2019. It should be noted that the calculation results in this Statement include several "worst-case" assumptions and therefore are expected to overstate actual power density levels from the proposed operations. Figure 2 describes the calculation methodologies, reflecting the facts that a directional antenna's radiation pattern is not fully formed at locations very close by (the "near-field" effect) and that at greater distances the power level from an energy source decreases with the square of the distance from it (the "inverse square law"). This methodology is an industry standard for evaluating RF exposure conditions and has been demonstrated through numerous field tests to be a conservative prediction of exposure levels.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1. *The location, identity, and total number of all operational radiating antennas installed at this site.*

There are reported no wireless base stations installed at or near the site, a 90-foot stadium light pole sited next to the north end of the bleachers on the west side of the football field at St. Ignatius College Preparatory, located at 2001 37th Avenue.

2. *List all radiating antennas located within 100 feet of the site that could contribute to the cumulative radio frequency energy at this location.*

There were observed similar antennas for use by AT&T Mobility and T-Mobile located on the three-story classroom building about 490 feet to the northeast.

3. *Provide a narrative description of the proposed work for this project.*

Verizon proposes to install twelve antennas. This is consistent with the scope of work described in the drawings for transmitting elements.

4. *Provide an inventory of the make and model of antennas or transmitting equipment being installed or removed.*

Verizon proposes to install twelve directional panel antennas – three CommScope Model NNH4-65A-R6, three Ericsson Model 6701, and six Ericsson Model 2208 – on the 90-foot tall light pole. The antennas would employ up to 4° downtilt, would be mounted at effective heights of about 63, 45, and 50 feet above ground, respectively, and would be oriented in identical groups of four at about 120° spacing, to provide service in all directions.

For the limited purpose of this study, it is assumed that AT&T has installed Kathrein Model 800-10964 and CommScope Model JAHH-65A directional panel antennas, employing up to 6° downtilt and mounted at an effective height of about 42 feet above ground, and that T-Mobile has installed Ericsson Model AIR21 and RFS Model APXVARR24 directional panel antennas, employing 2° downtilt and mounted at an effective height of about 42 feet above ground.

5. *Describe the existing radio frequency energy environment at the nearest walking/working surface to the antennas and at ground level. This description may be based on field measurements or calculations.*

There is no installed access to the antenna location. The maximum measured* RF level for a person at ground near the site was 0.0013 mW/cm$^2$, which is 0.65% of the most restrictive public limit.

* February 13, 2019, using calibrated Narda Type NBM-520 Broadband Field Meter with Type EF-0391 Isotropic Broadband Electric Field Probe (Serial No. D-0454).


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6. *Provide the maximum effective radiated power per sector for the proposed installation. The power should be reported in watts and reported both as a total and broken down by frequency band.*

The maximum effective radiated power proposed by Verizon in any direction is 18,545 watts, representing simultaneous operation at 193 watts for 28 GHz, 172 watts for CBRS, 5,250 watts for AWS, 5,130 watts for PCS, 4,170 watts for cellular, and 3,630 watts for 700 MHz service.

7. *Describe the maximum cumulative predicted radio frequency energy level for any nearby publicly accessible building or area.*

The maximum calculated cumulative level at any nearby building is 11% of the public limit; this occurs at the school buildings located about 240 feet to the northeast. The maximum calculated cumulative level at the nearby bleachers is 6.9% of the public exposure limit. The maximum calculated cumulative level at the second-floor elevation of any nearby residence† is 7.4% of the public exposure limit.

8. *Report the estimated cumulative radio frequency fields for the proposed site at ground level.*

For a person anywhere at ground, the maximum RF exposure level due to the proposed Verizon operation by itself is calculated to be 0.032 mW/cm$^2$, which is 5.2% of the applicable public exposure limit. Cumulative RF levels at ground level near the site are therefore estimated to be less than 6% of the applicable public limit.

9. *Provide the maximum distance (in feet) the three dimensional perimeter of the radio frequency energy level equal to the public and occupational exposure limit is calculated to extend from the face of the antennas.*

The three-dimensional perimeters of RF levels equal to the public and occupational exposure limits are calculated to extend up to 94 and 36 feet out from the Verizon antenna faces, respectively, and to much lesser distances above, below, and to the sides; this does not reach any publicly accessible areas.

10. *Provide a description of whether or not the public has access to the antennas. Describe any existing or proposed warning signs, barricades, barriers, rooftop striping or other safety precautions for people nearing the equipment as may be required by any applicable FCC-adopted standards.*

Due to their mounting location and height, the Verizon antennas would not be accessible to unauthorized persons, and so no measures are necessary to comply with the FCC public exposure guidelines. To prevent occupational exposures in excess of the FCC guidelines, it is recommended that appropriate RF safety training, to include review of personal monitor use and lockout/tagout procedures, be provided to all authorized personnel who have access to the structure, including

† Located at least 80 feet to the west, based on photographs from Google Maps.


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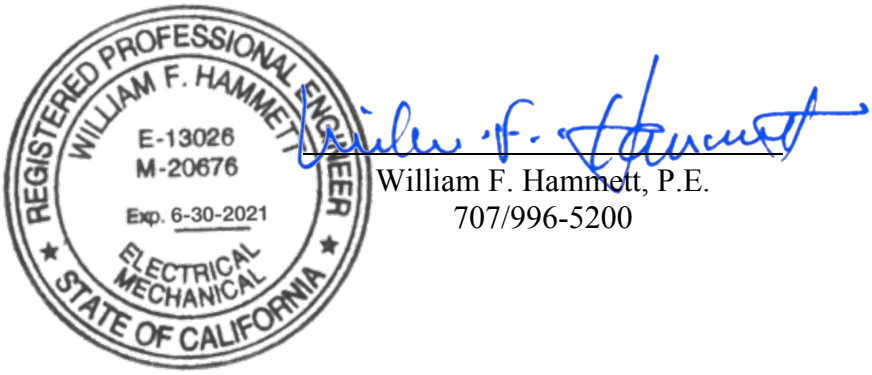
employees and contractors of the wireless carriers and of the property owner. No access within 36 feet directly in front of the Verizon antennas themselves, such as might occur during certain maintenance activities high on the pole, should be allowed while the base station is in operation, unless other measures can be demonstrated to ensure that occupational protection requirements are met. It is recommended that explanatory signs‡ be posted at the antennas and/or on the pole below the antennas, readily visible from any angle of approach to persons who might need to work within that distance.

*11. Statement of authorship and qualification.*

The undersigned author of this statement is a qualified Professional Engineer, holding California Registration Nos. E-13026 and M-20676, which expire on June 30, 2021. This work has been carried out under his direction, and all statements are true and correct of his own knowledge except, where noted, when data has been supplied by others, which data he believes to be correct.

## Conclusion

Based on the information and analysis above, it is the undersigned's professional opinion that operation of the base station proposed by Verizon Wireless at 2001 37th Avenue in San Francisco, California, will comply with the prevailing standards for limiting public exposure to radio frequency energy and, therefore, will not for this reason cause a significant impact on the environment. The highest calculated level in publicly accessible areas is much less than the prevailing standards allow for exposures of unlimited duration. This finding is consistent with measurements of actual exposure conditions taken at other operating base stations. Training authorized personnel and posting explanatory signs are recommended to establish compliance with occupational exposure limits.




William F. Hammett, P.E.
707/996-5200

April 10, 2020

‡ Signs should comply with OET-65 color, symbol, and content recommendations. Contact information should be provided (*e.g.*, a telephone number) to arrange for access to restricted areas. The selection of language(s) is not an engineering matter; the San Francisco Department of Public Health recommends that all signs be written in English, Spanish, and Chinese.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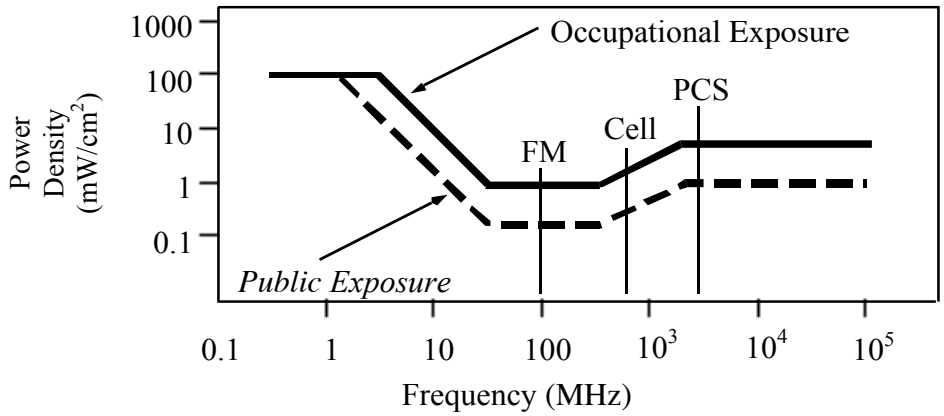
# FCC Radio Frequency Protection Guide

The U.S. Congress required (1996 Telecom Act) the Federal Communications Commission ("FCC") to adopt a nationwide human exposure standard to ensure that its licensees do not, cumulatively, have a significant impact on the environment. The FCC adopted the limits from Report No. 86, "Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," published in 1986 by the Congressionally chartered National Council on Radiation Protection and Measurements ("NCRP"). Separate limits apply for occupational and public exposure conditions, with the latter limits generally five times more restrictive. The more recent standard, developed by the Institute of Electrical and Electronics Engineers and approved as American National Standard ANSI/IEEE C95.1-2006, "Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz," includes similar limits. These limits apply for continuous exposures from all sources and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

As shown in the table and chart below, separate limits apply for occupational and public exposure conditions, with the latter limits (in *italics* and/or dashed) up to five times more restrictive:

| Frequency | Electromagnetic Fields (f is frequency of emission in MHz) | | | | | |
|---|---|---|---|---|---|---|
| Applicable Range (MHz) | Electric Field Strength (V/m) | | Magnetic Field Strength (A/m) | | Equivalent Far-Field Power Density ($mW/cm^2$) | |
| 0.3 – 1.34 | 614 | *614* | 1.63 | *1.63* | 100 | *100* |
| 1.34 – 3.0 | 614 | *823.8/ f* | 1.63 | *2.19/ f* | 100 | *180/ $f^2$* |
| 3.0 – 30 | 1842/ f | *823.8/ f* | 4.89/ f | *2.19/ f* | 900/ $f^2$ | *180/ $f^2$* |
| 30 – 300 | 61.4 | *27.5* | 0.163 | *0.0729* | 1.0 | *0.2* |
| 300 – 1,500 | $3.54\sqrt{f}$ | *$1.59\sqrt{f}$* | $\sqrt{f}/106$ | *$\sqrt{f}/238$* | f/300 | *f/1500* |
| 1,500 – 100,000 | 137 | *61.4* | 0.364 | *0.163* | 5.0 | *1.0* |




Higher levels are allowed for short periods of time, such that total exposure levels averaged over six or thirty minutes, for occupational or public settings, respectively, do not exceed the limits, and higher levels also are allowed for exposures to small areas, such that the spatially averaged levels do not exceed the limits. However, neither of these allowances is incorporated in the conservative calculation formulas in the FCC Office of Engineering and Technology Bulletin No. 65 (August 1997) for projecting field levels. Hammett & Edison has incorporated those formulas in a computer program capable of calculating, at thousands of locations on an arbitrary grid, the total expected power density from any number of individual radio frequency sources. The program allows for the inclusion of uneven terrain in the vicinity, as well as any number of nearby buildings of varying heights, to obtain more accurate projections.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## RFR.CALC™ Calculation Methodology

### Assessment by Calculation of Compliance with FCC Exposure Guidelines

The U.S. Congress required (1996 Telecom Act) the Federal Communications Commission ("FCC") to adopt a nationwide human exposure standard to ensure that its licensees do not, cumulatively, have a significant impact on the environment. The maximum permissible exposure limits adopted by the FCC (see Figure 1) apply for continuous exposures from all sources and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health. Higher levels are allowed for short periods of time, such that total exposure levels averaged over six or thirty minutes, for occupational or public settings, respectively, do not exceed the limits.

**Near Field.**
Prediction methods have been developed for the near field zone of panel (directional) and whip (omnidirectional) antennas, typical at wireless telecommunications base stations, as well as dish (aperture) antennas, typically used for microwave links. The antenna patterns are not fully formed in the near field at these antennas, and the FCC Office of Engineering and Technology Bulletin No. 65 (August 1997) gives suitable formulas for calculating power density within such zones.

For a panel or whip antenna, power density $S = \frac{180}{\theta_{BW}} \times \frac{0.1 \times P_{net}}{\pi \times D \times h}$, in $mW/cm^2$,

and for an aperture antenna, maximum power density $S_{max} = \frac{0.1 \times 16 \times \eta \times P_{net}}{\pi \times h^2}$, in $mW/cm^2$,

where $\theta_{BW}$ = half-power beamwidth of antenna, in degrees,
$P_{net}$ = net power input to antenna, in watts,
$D$ = distance from antenna, in meters,
$h$ = aperture height of antenna, in meters, and
$\eta$ = aperture efficiency (unitless, typically 0.5-0.8).

The factor of 0.1 in the numerators converts to the desired units of power density.

**Far Field.**
OET-65 gives this formula for calculating power density in the far field of an individual RF source:

power density $S = \frac{2.56 \times 1.64 \times 100 \times RFF^2 \times ERP}{4 \times \pi \times D^2}$, in $mW/cm^2$,

where ERP = total ERP (all polarizations), in kilowatts,
RFF = three-dimensional relative field factor toward point of calculation, and
D = distance from antenna effective height to point of calculation, in meters.

The factor of 2.56 accounts for the increase in power density due to ground reflection, assuming a reflection coefficient of 1.6 (1.6 x 1.6 = 2.56). The factor of 1.64 is the gain of a half-wave dipole relative to an isotropic radiator. The factor of 100 in the numerator converts to the desired units of power density. This formula is used in a computer program capable of calculating, at thousands of locations on an arbitrary grid, the total expected power density from any number of individual radio frequency sources. The program also allows for the inclusion of uneven terrain in the vicinity, as well as any number of nearby buildings of varying heights, to obtain more accurate projections.


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**Exhibit C**

**San Francisco City and County**
**Department of Public Health**

**Environmental Health Branch**

London Breed, *Mayor*
Grant Colfax, MD, *Director of Health*

Stephanie K.J. Cushing, MSPH, CHMM, REHS
*Director of Environmental Health*

**Review of Cellular Antenna Site Proposals**

**Project Sponsor :** *Verizon* **Planner:** *Ashley Lindsay*

**RF Engineer Consultant:** *Hammett & Edison* **Phone Number:** *(707) 996-5200*

**Project Address/Location:** *2001 37th Av*

**Site ID:** *521* **SiteNo.:** *SF05300A* **Report Dated:** *4/10/2020*

The following information is required to be provided before approval of this project can be made. These information requirements are established in the San Francisco Planning Department Wireless Telecommunications Services Facility Sitting Guidelines dated August 1996.

In order to facilitate quicker approval of this project, it is recommended that the project sponsor review this document before submitting the proposal to ensure that all requirements are included.

X 1. The location, identity and total number of all operational radiating antennas installed at this site was provided. (WTS-FSG, Section 10.4.1, Section 11, 2b)

Number of Existing Antennas: **0**

X 2. A list of all radiating antennas located within 100 feet of the site which could contribute to the cumulative radio frequency energy at this location was provided. (WTS-FSG, Section 10.5.2)

◉ **Yes** ○ **No**

X 3. A narrative description of the proposed work for this project was provided. The description should be consistent with scope of work for the final installation drawings. (WTS-FSG, Section 10)

◉ **Yes** ○ **No**

X 4. An inventory of the make and model of antennas or transmitting equipment being installed or removed was provided. The antenna inventory included the proposed installation height above the nearest walking/working surface, the height above ground level and the orientations of the antennas. (WTS-FSG, Section 10.5.2)

◉ **Yes** ○ **No**

X 5. A description of the existing radio frequency energy environment at the nearest walking/working surface to the antennas and at ground level was provided. A description of any assumptions made when doing the calculations was also provided. (WTS-FSG, Section 10.4.1a, Section 10.4.1c, Section 10.5)

◉ **Yes** ○ **No**

X 6. The maximum effective radiated power per sector for the proposed installation was provided along with the frequency bands used by the antennas. (WTS-FSG, Section 10.1.2, Section 10.5.1)

Maximum Effective Radiated Power: **18545** Watts

X 7. Based on the antenna orientation, the maximum cumulative predicted radio frequency energy level for any nearby publicly accessible building or area was provided. (WTS-FSG, Section 10.4, Section 10.5.1)

Maximum percent of applicable FCC public standard at the nearest building or structure: **11** %

Distance to this nearby building or structure: **240** feet

X 8. The estimated maximum cumulative radio frequency fields for the proposed site at ground level. (WTS-FSG, Section 10.5)

Maximum RF Exposure: **0.032** $mW/cm^2$ Maximum RF Exposure Percent: **5.2** %

X 9. The maximum distance (in feet) the three dimensional perimeter of the radio frequency energy level equal to the public and occupational exposure limit is calculated to extend from the face of the antennas was provided. Any potential walking/working surfaces exceeding regulatory standards were identified. (WTS-FSG, Section 10.9.2)

☑ Public Exclusion Area — Public Exclusion In Feet: **94**

☑ Occupational Exclusion Area — Occupational Exclusion In Feet: **36**

X 10. A description of whether or not the public has access to the antennas was provided. A description was also provided of any existing or proposed warning signs, barricades, barriers, rooftop stripping or other safety precautions for people nearing the equipment as may be required by any applicable FCC-adopted standards. All signs will be provided in English, Spanish and Chinese. (WTS-FSG, Section 9.5, Section 10.9.2)

◉ **Yes** ○ **No**

X 11. Statement regarding the engineer who produced the report and their qualifications was provided. The engineer is licensed in the State of California. (WTS-FSG, Section 11,8)

◉ **Yes** ○ **No**

X **Approved**. Based on the information provided the following staff believes that the project proposal will comply with the current Federal Communication Commission safety standards for radiofrequency radiation exposure. FCC standard CFR47 1.1310 **Approval of the subsequent Project Implementation Report is based on project sponsor completing recommendations by project consultant and DPH.**

***Comments:***

There are no antennas existing operated by Verizon installed on the roof top of the building at 2001 37th Av. Existing RF levels at ground level were around 1% of the FCC public exposure limit. No other antennas were observed within 100 feet of this site. Verizon proposes to install 12 new antennas. The antennas are mounted at a height of 45- 63 feet above the ground. The estimated ambient RF field from the proposed Verizon transmitters at ground level is calculated to be 0.032 mW/sq cm., which is 5.2 % of the FCC public exposure limit. The three dimensional perimeter of RF levels equal to the public exposure limit extends 94 feet and does not reach any publicly accessible areas. Warning signs must be posted at the antennas and roof access points in English, Spanish and Chinese. Workers should not have access to within 36 feet of the front of the antennas while they are in operation.

___ **Not Approved**, additional information required.

___ **Not Approved**, does not comply with Federal Communication Commission safety standards for radiofrequency radiation exposure. FCC Standard

1 Hours spent reviewing

Charges to Project Sponsor (in addition to previous charges, to be received at time of receipt by Sponsor)

Dated: 4/20/2020

Signed: _____

**Arthur Duque**
Environmental Health Management Section
San Francisco Dept. of Public Health
1390 Market St., Suite 210,
San Francisco, CA. 94102
(415) 252-3966

Exhibit D

# SUNSET & NORIEGA

March 30th, 2020

verizon

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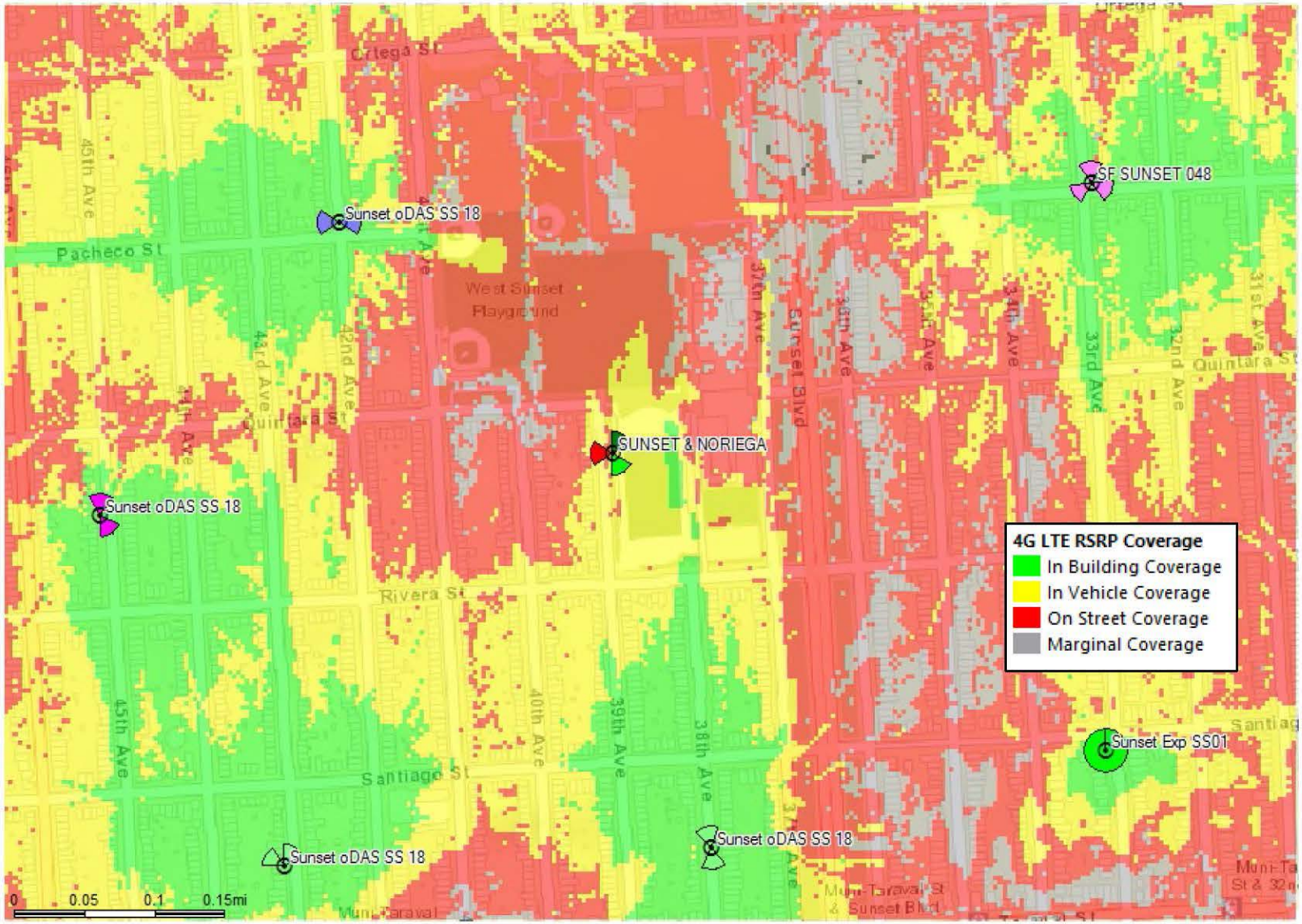
# Existing LTE Coverage

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# Proposed LTE Coverage

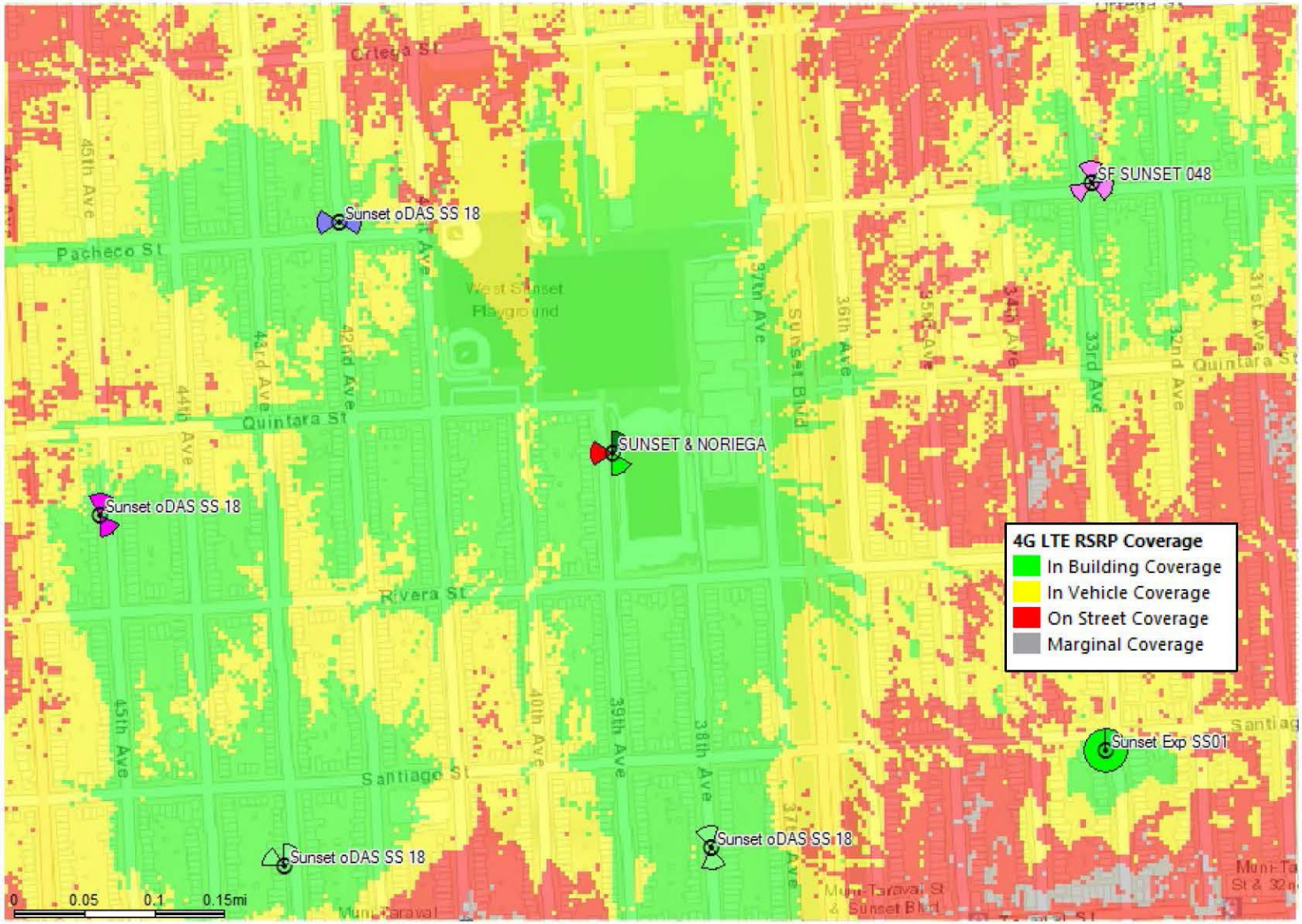


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**Exhibit E**


# HAMMETT & EDISON, INC.
CONSULTING ENGINEERS
BROADCAST & WIRELESS

WILLIAM F. HAMMETT, P.E.
RAJAT MATHUR, P.E.
ROBERT P. SMITH, JR.
ANDREA L. BRIGHT, P.E.
NEIL J. OLIJ, P.E.
MANAS REDDY, P.E.
BRIAN F. PALMER
M. DANIEL RO

ROBERT L. HAMMETT, P.E.
*1920-2002*
EDWARD EDISON, P.E.
*1920-2009*

DANE E. ERICKSEN, P.E.
*CONSULTANT*


**BY EMAIL CHAD.CHRISTIE@RIDGECOMMUNICATE.COM**

April 10, 2020

Mr. Chad Christie
Ridge Communications
949 Antiquity Drive
Fairfield, California 94534

Dear Chad:

As you requested, we have conducted the review required by the City of San Francisco of the coverage maps that Verizon Wireless will submit as part of its application package for its base station proposed to be located at 2001 37th Avenue (Site No. 255926 "Sunset & Noriega"). This is to fulfill the submittal requirements for Planning Department review.

## Executive Summary

We concur with the maps provided by Verizon. The maps provided to show the before and after conditions are reasonable representations of the carrier's present and post-installation coverage.

Verizon proposes to install twelve directional panel antennas – three CommScope Model NNH4-65A-R6, three Ericsson Model 6701, and six Ericsson Model 2208 – on the 90-foot stadium light pole sited next to the north end of the bleachers on the west side of the football field at St. Ignatius College Preparatory, located at 2001 37th Avenue. The antennas would employ up to 4° downtilt, would be mounted at effective heights of about 63, 45, and 50 feet above ground, respectively, and would be oriented in identical groups of four at about 120° spacing, to provide service in all directions. The maximum effective radiated power proposed by Verizon in
any direction is 18,545 watts, representing simultaneous operation at 193 watts for 28 GHz, 172 watts for CBRS, 5,250 watts for AWS, 5,130 watts for PCS, 4,170 watts for cellular, and 3,630 watts for 700 MHz service.

Verizon provided for review two coverage maps, attached for reference. The maps show Verizon's 4G LTE coverage in the area <u>before</u> and <u>after</u> the site is operational. Both maps show five signal levels of coverage, which Verizon colors and defines as follows:

| | |
|---|---|
| Green | better than -75 dBm |
| Yellow | -75 dBm to -85 dBm |
| Red | -85 dBm to -95 dBm |
| Grey | -95 dBm to -105 dBm |
| Black | worse than -105 dBm |


*e-mail:* **mail@h-e.com** **S9UJ**
*Delivery:* **470 Third Street West • Sonoma, California 95476**
*Telephone:* **707/996-5200 San Francisco • 707/996-5280 Fax • 202/396-5200 D.C.**

These service thresholds used by Verizon are in line with industry standards, similar to the thresholds used by other wireless service providers.

We conducted our own drive test, using an Ascom TEMS Pocket network diagnostic tool with built-in GPS, to measure the actual Verizon 4G LTE signal strength in the vicinity of the proposed site. Our fieldwork was conducted on April 6, 2020, between 9:50 AM and 11:40 AM, along a measurement route selected to cover all the streets within the map area that Verizon had indicated would receive improved service.

Based on the measurement data, we conclude that the Verizon 4G LTE coverage map showing the service area without the proposed installation includes areas of relatively weak signal levels in the carrier's present coverage. The map submitted to show the after coverage with the proposed base station in operation was reportedly prepared on the same basis as the map of the existing conditions and so is expected to accurately illustrate the improvements in coverage.

We appreciate the opportunity to be of service. Please let us know if any questions arise on this matter.

Sincerely yours,

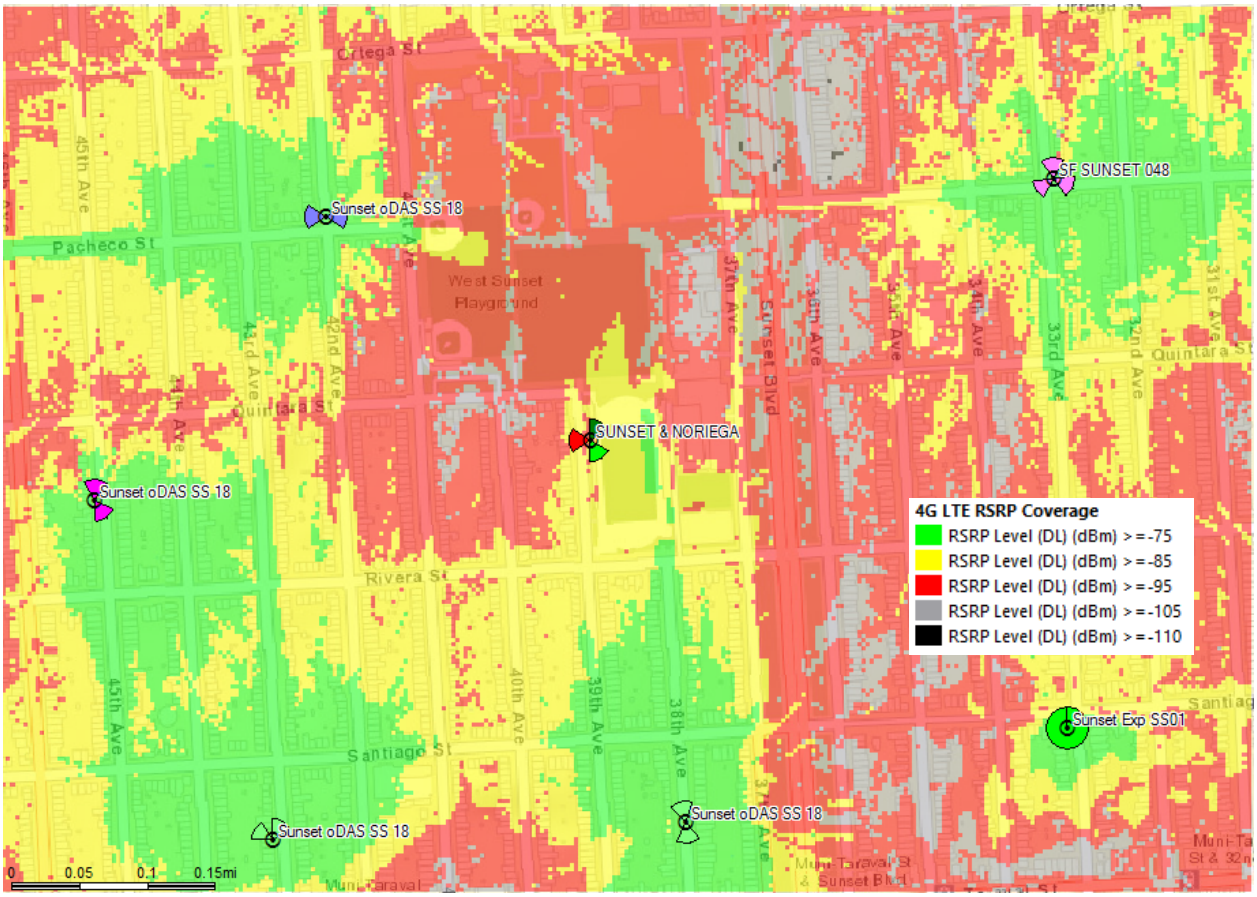
REGISTERED PROFESSIONAL ENGINEER
WILLIAM F. HAMMETT
E-13026
M-20676
Exp. 6-30-2021
ELECTRICAL
MECHANICAL
STATE OF CALIFORNIA

William F. Hammett, P.E.

Enclosures

scn

# Existing LTE Coverage




verizon

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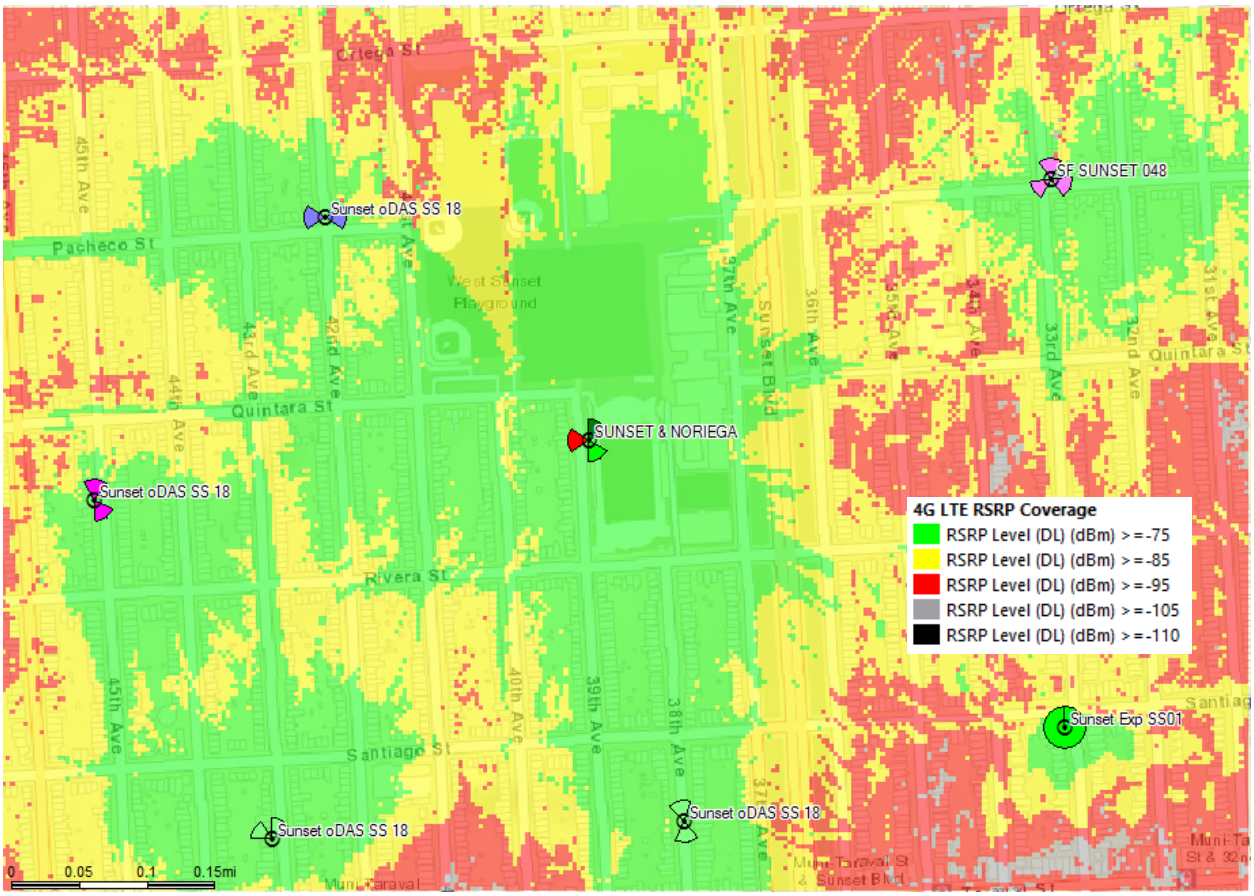
# Proposed LTE Coverage




verizon

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| | |
|---|---|
| **From:** | 陳柔菁Valerie Chan |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunset neighbors |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Thursday, September 17, 2020 12:01:40 PM |

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

September 17, 2020

Dear Mr. Mar and Members of the SF Board of Supervisors,

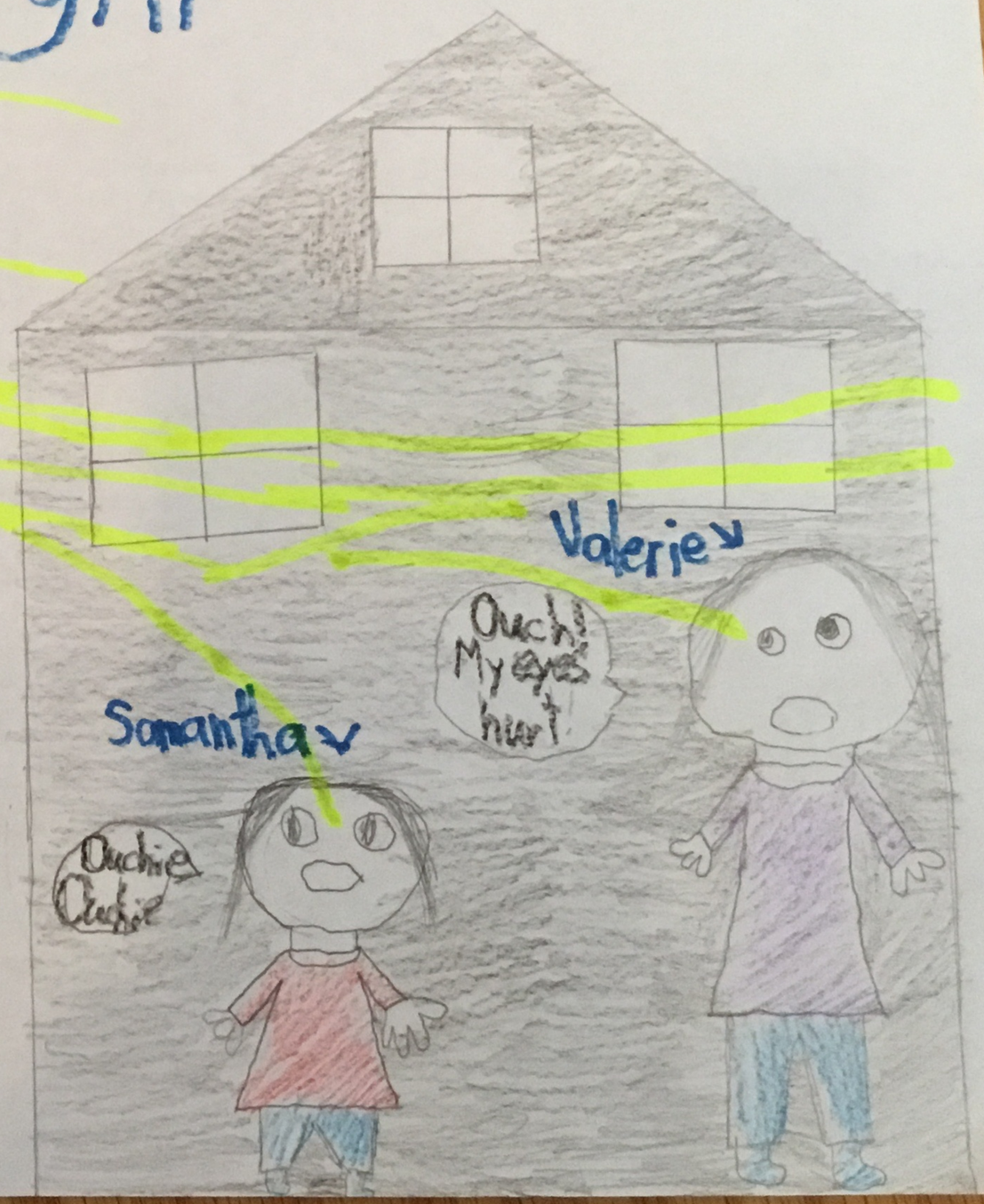
I am a 2nd grader and I want to oppose the Saint Ignatius Permanent 90' tall Lights project with my drawing.

Valerie

Too bright

SI LIGHTS

No light PLEASE



| | |
|---|---|
| **From:** | Diane Marbello |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Thursday, September 17, 2020 12:01:34 PM |

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

- Dear Mr. Mar and Members of the SF Board of Supervisors,

I live in the Sunset District near St. Ignatius College Preparatory and I am strongly opposed to the St. Ignatius plans to light their main field and hold 150 or more-night events until 9 pm on weekdays and 10 pm on weekends. The area around St. Ignatius College Preparatory is a residential neighborhood.

SI says the majority of their proposed light use is for practices. However, SI already has a practice field with lights on 37th Ave. These lights will be enormous - 9 stories tall with very large light arrays on top. It is totally out of character with our residential Sunset neighborhood and will be seen from many blocks away and even from Grandview Park.

It is not just about the lights, it’s about the 150 nights a year of sports activities that will disrupt our neighborhood evenings by the loud noise levels, blocked driveways, not being able to park our vehicles, litter, etc. Also, for our cars that are already parked we have students hit our cars parking cars in spaces that are too small. This will happen more often damaging our vehicles.

This project has no pubic value - it's for SI's private use only. Yet, it will have a direct effect on the quality of our quiet residential evenings. Very few SI students come from our neighborhood - most students are from outside San Francisco.

In addition, what about the safety of those young students driving home in the dark after practices end at 9 or 10:00 who are not experienced drivers.

No other high school in SF has the need for permanent night-time stadium lights
Those schools are able to schedule their sports programs along with their regular academics.
SI wants the lights for their private school prestige and recruitment efforts

SI was granted the permit without any sort of environmental or health studies.
How will lights on until 9 pm almost half the year affect our children's sleep/brains?
What about the SI students themselves?

SI will has not engaged with their neighbors to hear our concerns or discuss other alternatives
April 23 neighborhood remote meeting was a joke - we were muted, ended early
SI refused to have another neighborhood wide remote meeting, and only met with a few neighbors. If the lights are built - enforcement of SF Planning's rules will be left up to the

neighbors to report.

Living here, we are used to SI having weekday/weekend sporting activities with noise, traffic, parking issues during the day time - Extending these activities into our evenings is new and unacceptable. These lights will permanently alter the livability of our Sunset neighborhood.

Thank you for your consideration.

Joy Marbello

| | |
|---|---|
| **From:** | Dan Dooling |
| **To:** | Board of Supervisors, (BOS) |
| **Subject:** | Appeal to SI lights |
| **Date:** | Thursday, September 17, 2020 11:41:43 AM |
| **Attachments:** | SI appeal.docx |

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Hello,

I have attached my letter of appeal

Dan Dooling

Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648

My name is Dan Dooling of 2135 39th Ave and I support the SI Neighborhood Association appeals against the proposed Saint Ignatius Permanent Stadium Lights.

This permanent nighttime lighting project and proposed nighttime activities for over half of the year is and will be a major disruption to all the families and residents in this quiet neighborhood. This is an intrusion of our evening and nighttime home life with noise, bright lighting, commotion, parking problems. This is distruptive and unacceptable!

You must consider the health risk involved in this proposed project. Very young children that need nightly sleep for their growth and development should not be subjected to all this noise and commotion disrupting their sleep. I am also concerned about the health risk due to electromagnetic waves, especially to all children, even the students that attend this school.

I am so disappointed in this SI school, that, at one time, preached values and now to see how this school is just some powerful greedy entity that is all about benefiting themselves at the expense of the families and residents of this neighborhood.

I hope that the governing representatives of this city really listen to what each of us has to say. It is your job to represent us, the residents and families living here in the City.
We are not visitors to this neighborhood like the students of SI school. We Live Here!

Dan Dooling

| | |
|---|---|
| **From:** | Stanley Chan |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunset neighbors |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Thursday, September 17, 2020 11:38:31 AM |

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

Dear Mr. Mar and Members of the San Francisco Board of Supervisors,

My name is Stanley Chan and I live at 2819 Rivera St. I support the SI Neighborhood Association where we strongly oppose the Saint Ignatius (SI) permanent 90' tall lights project. My family live directly across from the SI football field between 38th and 39th Ave. Throughout the years, we have experienced traffic problems whenever SI has events ranging from speeding, skipping traffic stops, double parking on the street to blocking driveways. The neighborhood is a small and quiet community, these problems created an unsafe environment for us to even walk around the area. With the new lights project and the intension to host more events late into the evening, one can only imagine the situation will get a lot worst. During the hearing, SI has presented themselves as a good neighbor, but this is such an insult to the community. For example, SI decided to rent a few temporary lights for their night practice earlier in February. The temporary lights worked great for their fields, but it also shined straight into our house, from our living room all the way to our master bedroom at the very back of our house. The whole house was flooded with lights. My kids cried that the lights hurt their eyes and we had to close off our curtains for weeks until their season was over. My wife had called SI and spoke with Tom (SI, Director of Communication) and John (Director of Athletics), but it did not help. Can you imagine what happens after the lights are installed and there are issues?

The project is designed to be used for SI and their so-called SI affiliated usage only, which translates to privileged/affluent families that can afford private school benefiting from the project while the small quiet community suffers. San Francisco is already experiencing the wealth gap, would the SF board of supervisors want to approve this project as their legacy displaying privileged families get what they want while the small community deals with the consequences? I do not recall/know any other San Francisco public schools in the city installed stadium lights and are using them for a considerable amount of nights throughout the year.

The project sponsor claimed that they need the lights so the high school student can have quality sleep and start school late, so they need to extend after school practice in the evening. Have they considered moving their schedule to practice in the daytime and have classes later into the evening? In the simple shift in schedule, they would not need the lights. The community has young kids, they must sleep early and wake up early to get to school. Is their quality of sleep not important?

I strongly urge the board to reconsider and repeal the conditional approval of SI's light project. At the minimum, I request the board to at least request an EIR to study the impact of the light pollution and potential nuisance caused by the high number of events.

Regards,

Stanley

| | |
|---|---|
| **From:** | SISunsetNeighbors @hotmail.com |
| **To:** | Board of Supervisors, (BOS) |
| **Subject:** | Fw: Email 5 of 5: BOS File #200992 and #200996, CEQA and CUA Appeal Supplement – Saint Ignatius Stadium Lighting (Planning #2018-021648CUA) |
| **Date:** | Thursday, September 17, 2020 11:41:00 AM |
| **Attachments:** | Outlook-dnvmirkc.png<br>BOS File #200992 and #200996 - SINA Commission Submittal 3 - 2020_07_22.pdf |

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

Resending with correct email address
Apologies a typo in your address below.

---

**From:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Sent:** Thursday, September 17, 2020 11:36 AM
**To:** BOS Legislation, (BOS) <bos.legislation@sfgov.org>; Board.of.Supevisors@sf.org <Board.of.Supevisors@sf.org>
**Cc:** Gordon.Mar@sfgov.org <Gordon.Mar@sfgov.org>
**Subject:** Email 5 of 5: BOS File #200992 and #200996, CEQA and CUA Appeal Supplement – Saint Ignatius Stadium Lighting (Planning #2018-021648CUA)

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

---

Attached please find the final document we are submitting today that supplements the CEQA and CUA appeals filed under BOS File #200992 and #200996 for the Saint Ignatius Stadium Lighting Project.
This document was originally submitted to the Planning Commission in advance of the 7/23/20 Commission hearing on the project.
We would like to put this in the Board of Supervisors records for our appeals.

Kindly confirm receipt of all 5 emails submitted today, 9/17/20.
Thank you

Deborah Brown, Secretary

SI Neighborhood Association

---

July 22, 2020

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

cc: Planning Commissioners:
Mr. Joel Koppel, President joel.koppel@sfgov.org
Ms. Kathrin Moore, Vice-President kathrin.moore@sfgov.org
Ms. Deland Chan deland.chan@sfgov.org
Ms. Sue Diamond sue.diamond@sfgov.org
Mr. Frank Fung frank.fung@sfgov.org
Ms. Theresa Imperial theresa.imperial@sfgov.org
Ms. Milicent Johnson milicent.johnson@sfgov.org

**RE: 2nd Supplement to SINA Advance Submissions dated May 6, 2020 and June 9, 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 2nd supplement to our prior Advance Submission Documents filed May 6, 2020 and June 9, 2020 concerning the proposal to install stadium lighting at the Saint Ignatius athletic field as a Conditional Use (Planning Case No. 2018012648CUA).

Both prior comment sets are included in the current hearing packet for the July 23, 2020 hearing and available at: https://drive.google.com/file/d/1Z1eyXDgRwAplPKLKnXlEVh-cXC1TyhY_/view?usp=sharing, and https://drive.google.com/file/d/1SoVI9OkGWPhj8N5Pl8Imye7aLTuvcK4w/view.

This additional supplement is necessary because new information has become available since our two prior submittals. The two continuances of the project hearing (originally scheduled for May 14 and rescheduled to June 11, 2020) has also given us the time to review project documents in more detail and engage additional experts for their input.

Sincerely,

*Deborah Brown*

Deborah Brown, Association Secretary
Saint Ignatius Neighborhood Association
sisunsetneighbors@hotmail.com

Attachment: July 22, 2020 SINA Supplement to SINA Advance Submissions

**2nd Supplement to SINA Advance Material Submittal**
**for the Saint Ignatius Stadium Lighting Proposal,**
**CUA application #2018-012648CUA**

The comments below supplement the May 6, 2020 and June 9, 2020 Saint Ignatius Neighborhood Association (SINA) Advance Materials Submittals to the San Francisco Planning Commission for the Saint Ignatius College Preparatory High School's Stadium Lighting Project (#2018-012648CUA). SINA filed the first set of comments in advance of the previously scheduled May 14, 2020 Commission hearing and the second set in advance of the previously scheduled June 11, 2020 hearing. Both comment sets are included in the current hearing packet for the July 23, 2020 hearing and are available here as well: https://drive.google.com/file/d/1Z1eyXDgRwAplPKLKnXlEVh-cXC1TyhY_/view?usp=sharing, and https://drive.google.com/file/d/1SoVI9OkGWPhj8N5Pl8Imye7aLTuvcK4w/view.

This submittal summarizes additional information that has come to light since our June 9, 2020 submittal, discusses how the proposed project is inconsistent with the San Francisco General Plan, and reiterates SINA's continued key concerns about the project's adverse impacts.

## A. New information

### 1. Saint Ignatius - SINA meeting July 7, 2020

School representatives held a July 7, 2020 Zoom meeting with four SINA representatives as a means to engage with the neighbor community, apparently at the request of the Planning Department. During that meeting, school representatives made the following statements that continue to concern SINA about the lighting project:

a) When asked if they would consider having another neighborhood-wide remote meeting – this time without muting the neighbors and in the interest of true dialog – the school replied that this four-person neighbor meeting would be the extent of engagement, stating: "All the pre-planning is done for the July 23 Commission hearing. The Planning Department asked us to have this meeting."

b) They confirmed that night use of the athletic field would occur virtually every weeknight during the school year (August 15 – May 31) or up to 200 nights per year, and for 20 large games on Friday or Saturday nights. This is double the number of nights stated in their revised project description (see hearing packet pdf p. 104). Currently, night use of the field has ended at dark or was extended under limited use of temporary lighting only for large games. Projected attendance would be up to 1,000 people on Mondays – Thursdays, and up to 2,800 people on Friday and Saturday night games. We remain extremely concerned about the adverse impacts on traffic, parking, noise, trash, and other noxious emissions and behaviors that this new level and intensity of activity would bring to the neighborhood virtually every night throughout the school year.

c) They stated that their request to modify the practice field lighting CUA (Record #2003.1273C) from the currently authorized 7:30 pm to 9 pm on weeknights, 10 pm on Fridays, and 8 pm on weekends is no longer a part of the current CUA application. However, they indicated that they may request that modification again in

the future. The request is still described in the project proposal of the draft Commission CUA motion (see project hearing packet pdf pages 96, 98, and 101) and should be removed from the current stadium lighting proposal so that the Commission does not inadvertently approve that modification without sufficient review.

d) The school did not address noise in their proposed CUA draft motion Exhibit A Condition #11 language saying that they "probably did not consider noise". This is troubling since the CEQA Impacts section of the draft motion (see hearing package pdf p. 71) contends (without any scientific or technical basis) that the project would not result in a substantial increase in ambient noise levels. Given that field noise would now occur at least 200 nights per year, there will undoubtedly be increased noise levels. Without a noise study there is no way to determine whether the increase would be substantial or not. SINA requested such a study in our May 6 and June 9, 2020 comments.

e) At SINA's request, the school provided dimensions of the lighting arrays at the top of the 90-foot poles. According to the plan drawings provided, the arrays would occupy a space over 17 feet long, nearly 5 feet tall and nearly 4 feet deep. This bulk is approximately equivalent to the size of some 10-yard trash dumpsters[1] or three typical 4-yard trash dumpsters lined up end to end[2]. This bulk at the top of each pole would create a permanent blight on the landscape, especially during daytime and visible from the entire surrounding area.

f) The school representatives were unaware that they had not responded to neighbor questions submitted to the ASK SI webpage[3] over the last several months and said they would review those submittals and respond to them. To date, we are unaware that they have done so.

g) The school representatives agreed to obtain information from Musco on the effects of fog on lighting levels and reflection. To date, SINA has not received that information.

## 2. Musco Photometrics Study

The repeated Commission hearing continuances have allowed SINA to conduct a more in-depth review of the revised Musco photometrics documents with the assistance of a highly qualified, award-winning lighting design consultant and architect (see lighting report in Appendix A).

The report author concluded that the proposed stadium lighting installation would have a severe and negative impact on the neighborhood, and in particular, the residences located directly across the street from the school athletic field on 39th Avenue. Due to the quantity, height and most importantly, the use schedule of the lights, they would create a significant problem for the health and wellbeing of the neighbors and neighborhood. While intermittent

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[1] https://www.republicservices.com/dumpster-rental?tab=residential
[2] https://wasteindustries.com/commercial/dumpster/rentalservices
[3] https://docs.google.com/forms/d/e/1FAIpQLSd5bSWGLQ_px_pDpDe1CMdTMDgZiQakm20cqbFShIWTew_Zqw/viewform

use of the lighting (e.g. one night game a week in the fall, as is currently done with temporary lights) is generally tolerable, the use of the lights for up to 200 nights of the year (55% of the entire year and virtually every weeknight during the school year) for hours at a time, ostensibly when the nights are the longest (fall and winter), will fundamentally change the nature of the neighborhood and eliminate the darkness currently present there. Furthermore, the presence of such high light levels during hours of natural darkness will not only create problems with light pollution and glare, but has the potential to disrupt circadian cycles, particularly for the residents immediately opposite the athletic field.

The lighting consultant's report goes into detail about the fundamental issues related to the proposed lights and problems with Musco's photometrics study, including:

a) Light levels at the 39th Avenue home façades are 2-3 times higher than recommended by the Illuminating Engineering Society (IES) for those residential areas.

b) Light levels at the school's property line are 6 to 7 times higher than even a "high" pedestrian light level of 1 foot candle.

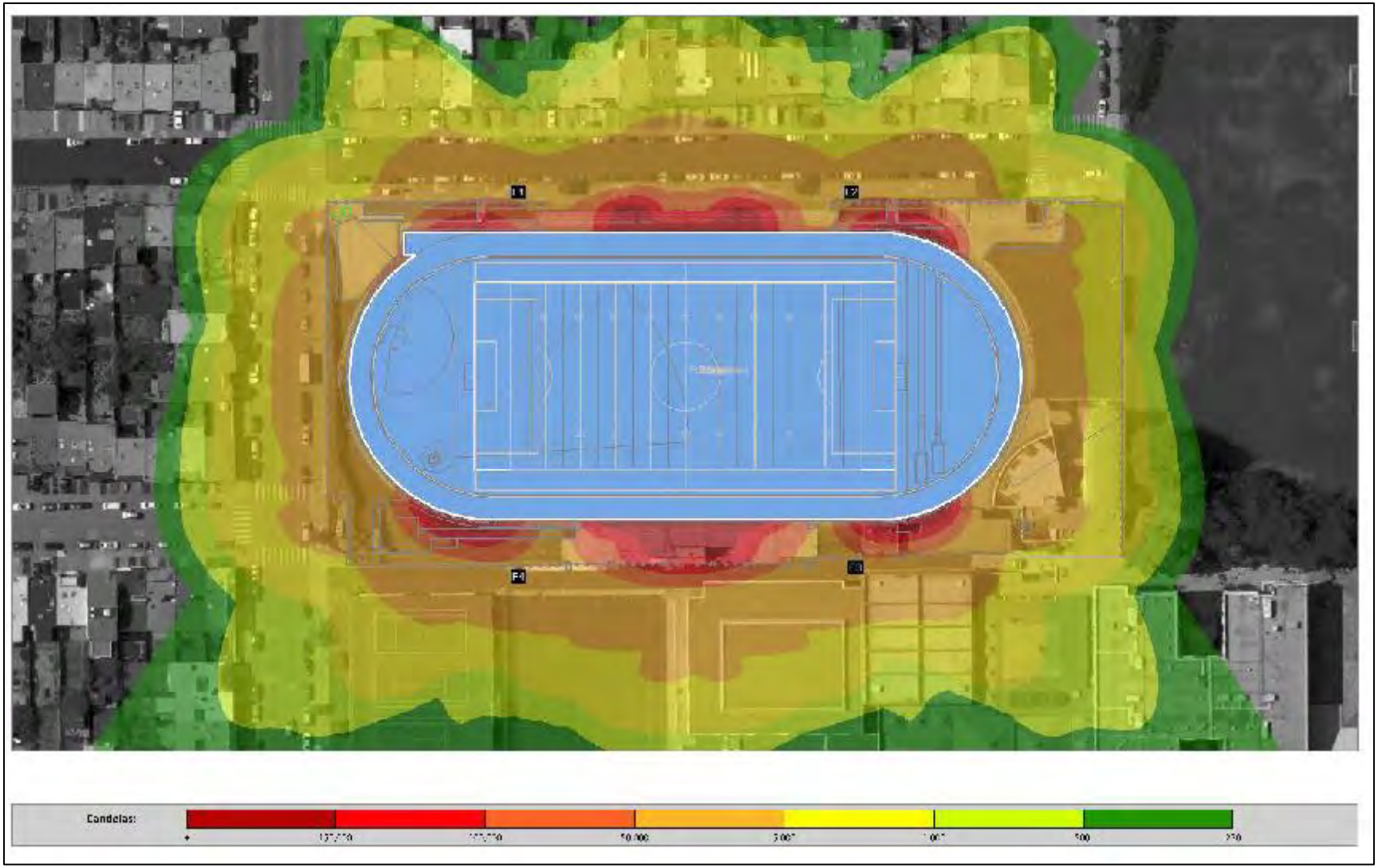
c) Misleading vertical illuminance levels measured at 3 feet off the ground significantly under-represent what the light levels would be at the 2nd floor windows of the homes (homes in the neighborhood have garages and entries on the first floor and living areas on the 2nd floor). Light trespass into windows would be 26 times higher than LEED guidelines of 0.1 foot candle.

d) The Musco photometrics do not show measurements of luminance, roughly a measure of "brightness". The addition of 50 foot candles of light onto and across the athletic field will turn the field into a bright, light-reflecting surface, and will do the same to other surfaces nearby (sidewalks, bleachers, out-building walls, etc.).

The report confirms SINA's comments submitted previously (June 9, 2020 submittal Comment 1.2) and supplemented in Sections A.3 and A.4 below, including:

a) Musco's glare map (Figure 1 below) shows the façades of the houses along 39th Avenue to be mostly in the yellow band, indicating a range of 1,000 to 5,000 candela. By Musco's own map legend, this is not negligible in terms of the amount of glare (which they indicate as <= 500 candela shown in dark green). Candela levels outside of the school's property line on the 39th Avenue sidewalk and street are even higher, shown in the range of 5,000 to 50,000 candela. Musco defines "significant glare" as starting at 25,000 candela and being equivalent to a car's high beam headlights. Since Musco has not provided the IES data files for their luminaires, it is not possible to do a separate analysis of the installation, particularly the characteristics of the luminaires as they relate to glare, backlight and uplight.

**Figure 1. Musco Glare Map**



b) Typically, sports lighting is not well shielded in any direction and contributes greatly to light pollution as the luminaires are angled. In order to verify any claims of shielding, Musco needs to provide the IES files and a detailed luminaire photometric report.

c) Fog increases the amount of light pollution because it disperses light through the water molecules suspended in air and serves as an outdoor "ceiling" which the light bounces off of and reflects back down to the ground.

d) The significant increase in the quantity and duration of blue-enriched light during dark hours has the potential to have significant impacts on circadian rhythm-related health, especially in children who are much more vulnerable to such disruptions. Animals and plants are also susceptible to disruptions in behavior, growth, and reproduction from excess blue-white light.

## 3. Adverse Human Health Effects

a) SINA's May 6, 2020 comments (Fact 5.F and associated comments) discussed some of the adverse health effects of the proposed LED lighting, and the American Medical Association's concerns for and guidelines over use of such lights.

b) The New York Times published an article on July 13, 2020[4] summarizing the results of a recent study that found that the more intense the lighting in teenagers' neighborhoods, the poorer their sleep and the greater their risk for depression and anxiety. The NY Times article quoted the senior author as saying: "At least as individuals, we ought to try to minimize exposure to light at night." SINA obtained and reviewed the report published in JAMA Psychiatry[5]. We are concerned about the study's findings not only for our neighborhood children but also for the student athletes who would have direct exposure to the high intensity lighting on the athletic field for several hours at a time most nights of the week. In addition to games, the school's three football teams and six soccer teams practice six days a week. The four lacrosse teams and four track and field teams practice five day a week. This continual high level of exposure should be of grave concern to parents and school administrators who claim that the school needs to start later in the day for student health reasons and that the lights are needed to provide sufficient time for games and practices after a later-ending school day. This perspective is incompatible with the scientific evidence on the harm to adolescents from over exposure to high-intensity light.

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[4] https://www.nytimes.com/2020/07/13/well/mind/bright-outdoor-lights-tied-to-less-sleep-more-anxiety-in-teenagers.html?action=click&module=Top%20Stories&pgtype=Homepage&contentCollection=AtHome&package_index=0

[5] https://jamanetwork.com/journals/jamapsychiatry/article-abstract/2767698?utm_campaign=articlePDF&utm_medium=articlePDFlink&utm_source=articlePDF&utm_content=jamapsychiatry.2020.1935

## 4. Adverse Biological Effects

a) The Musco photometrics study indicates that the total illumination for all pole-mounted lighting would exceed to 6.3 million lumens over the 2.5-acre athletic field. This amount of additional concentrated lighting is several orders of magnitude higher than the ambient nighttime lighting levels in the immediate neighborhood which is limited to street lighting and some minimal home and building façade lighting (see Figure 2 below). The amount of reflected light from the athletic field has not been determined by Musco but, as noted above it is likely to be significant, and exacerbated by the regularly occurring fog in the area.

b) In addition to the adverse human health effects, these lights would have significant adverse biological effects on wildlife. Extensive peer-reviewed literature is available [6, 7, 8, 9] that documents these effects, including disruption of the nocturnal environment, attraction of sea birds and migratory birds to bright lights, alterations in amphibian, reptile, insect and pollinator behavior, reproductive changes in many species, and reduction in foraging and roosting behavior of bats.

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[6] For instance, the Journal of Experimental Zoology Part A devoted an entire issue to Artificial Light at Night as an Environmental Pollutant. Volume 329 Issue 8-9, October/November 1, 2018. https://onlinelibrary.wiley.com/toc/24715646/2018/329/8-9

[7] https://www.researchgate.net/publication/272889669_Impacts_of_artificial_lighting_on_bats_A_review_of_challenges_and_solutions

[8] https://www.researchgate.net/profile/Michael_Salmon3/publication/235602286_Perry_G_B_W_Buchanan_R_Fisher_M_Salmon_and_S_Wise_2008_Effects_of_night_lighting_on_urban_reptiles_and_amphibians_Chapter_16_in_Urban_Herpetology_Ecology_Conservation_and_Management_of_Amphibians_and_/links/57486e6108aeae389f4e1792.pdf

[9] https://www.nature.com/articles/s41598-018-21577-6

**Figure 2. Musco Nighttime Photo Rendition**

c) The US Fish and Wildlife Service's online IPaC mapping system[10] provides information on the known or expected ranges of threatened and endangered species protected under the federal Endangered Species Act as well as migratory birds protected under the federal Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act. An online data check was conducted on July 20, 2020 and lists the species that could be affected by activities in the 98-acre area bounded by Ortega and Santiago Streets, and 36th and 41st Avenues, including the school (see Appendix B). Some of the species are also state-listed threatened or endangered species. In addition, over 67 more common bird species have been observed since 2015 at the West Sunset Playground, as reported on the eBird website[11] (see Appendix C). There are also 16 bat species within the Bay area[12] and at least four in the City[13] that would also be adversely affected by the stadium lighting. Lastly, as noted in SINA's May 6, 2020 comments the area along Sunset Boulevard is an urban bird refuge[14].

d) It is not the role of SINA to investigate the potential adverse effects on these sensitive species. However, it is highly likely that the new high-intensity lighting would adversely impact at least some of them. A CEQA review would typically trigger consultation with the US Fish and Wildlife Service and California Department of Fish and Wildlife; however, the lighting project has been determined to be CEQA exempt, so this review has not occurred.

e) We firmly believe that CEQA review is warranted as discussed in our May 6 and June 9, 2020 comments. But, irrespective of CEQA applicability, the school is responsible for conducting sufficient due diligence to first identify and then to mitigate adverse effects of the proposed lighting on sensitive species in accordance with state and federal law. The Planning Department must also support the City's Biodiversity Program and the Department's own Biodiversity Policy by providing robust oversight on projects that could imperil biodiversity. The Department's policy states: "*In San Francisco, 95% of our land area is developed and its remaining natural heritage, including a dozen distinct ecological communities and several endangered species, is in a precarious state. From the Pacific Ocean to the Bay, the City is a unique natural environment worth protecting. The Planning Department has an important role (in-dependently and in collaboration with our fellow City agencies) to help San Francisco be a sustainable and healthy city for all its inhabitants; human, animal, and plant*." The presence of sensitive species must be investigated and potential adverse impacts of the stadium lighting project on them must be evaluated and mitigated to the extent possible.

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[10] https://ecos.fws.gov/ipac/
[11] https://ebird.org/hotspot/L6317907?yr=all&m=
[12] https://baynature.org/article/where-are-there-bats-in-the-bay-area/
[13] https://www.krauel.com/publications/Krauel2016plosone.pdf
[14] https://sfplanning.org/sites/default/files/resources/2018-08/Urban%20Bird%20Refuge.pdf

## B. Supplemental Comments - San Francisco General Plan Consistency

SINA's prior comments were focused primarily on the stadium lighting project in relation to CEQA and the San Francisco Planning Code. These supplemental comments focus specifically on consistency with the General Plan.

The draft Commission motion states: "The Department finds that the Project is, on balance, consistent with the Objectives and Policies of the General Plan." However, the Department limited its evaluation and discussion only the few General Plan elements, objectives, and policies that could be leveraged to make the project appear to be consistent with the General Plan, when it is not. The draft motion ignores the spirit and intent of the General Plan, dismisses several pertinent policies, and fails to quantify even the minimal benefits stated.

### 1. Environmental Protection Element

This Element is completely ignored in the draft motion. Policy 11.1 is relevant and discourages new uses in areas in which noise levels exceed the noise compatibility guidelines for the new use. The policy recommends that new development be examined to determine whether background and/or thoroughfare noise level is consistent with guidelines for the proposed use.

a) The policy's associated Map 1 shows background levels in the immediate neighborhood from 50 decibels to at most 65 decibels based on 2009 information[15]. The associated Land Use Compatibility Chart of Community Noise[16] for outdoor spectator sports uses specifies that for all background noise levels, new construction or development should be undertaken "only after a detailed analysis (underlines added for emphasis) of the noise reduction requirements is made". For background levels at about 72 decibels (typical background traffic noise) or higher, new construction or development "should generally not be undertaken."

b) The additional project-related noise will come primarily from the school's sound system and loud speakers, amplified recorded music, band music, cheering, car horns and air-horns (bleachers are located directly inside the school property line on 39th Avenue). The Verizon wireless ground-based equipment would create another new noise source.

c) SINA noted the need for a valid noise study in our May 6, 2020 comments (Fact and Comment 5.D) in the context of Planning Code Section 303(c)(2)(C). In our June 9, 2020 comments we noted that noise studies were conducted under CEQA review for numerous other stadium lighting projects. We also discussed the inadequacy of this project's CEQA exemption determination that dismissed potential noise impacts.

d) Unfortunately, with the ongoing COVID situation, there is no way to obtain an accurate background noise level since regular traffic and non-school related activities are not occurring normally. Similarly, there is also no way to obtain athletic field noise levels,

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[15] https://generalplan.sfplanning.org/images/I6.environmental/ENV_Map1_Background_Noise%20Levels.pdf
[16] https://generalplan.sfplanning.org/I6_Environmental_Protection.htm#ENV_TRA_10

particularly during high attendance night football games since those games are also not occurring at this time. We reiterate our contention that the project should not be approved until a valid noise study can be conducted and confirms no adverse impact.

**2. Commerce and Industry Element, Policy 1.1 and 1.2**

These policies are mis-applied in the draft motion which states: "The Project will enhance the total city living and working environment by providing recreational and communications services for residents and workers within the City."

a) Our prior comments noted that the project will not provide any recreational benefit to most residents, only to the school's students and competing teams. Our June 9, 2020 Comment 2.1 also urged the Commission to decouple the Verizon wireless installation from the stadium lighting project since each project uses the other proposed project to justify its supposed benefits and the Verizon project does not require a 90-foot pole but assumes the presence of the light poles to justify their preferred wireless location at the school. The impacts and benefits of each should be evaluated on their individual not their combined assumed merits. We reiterate our prior comments that the Verizon wireless project must consider alternative sites for the proposed wireless installation.

b) The draft motion disregards important context for Policy 1.1, which states in part: "…<u>environmental impacts of proposed developments, often previously ignored, are to be carefully evaluated before approval of a development. The economic and social benefits of such developments are often presumed, and they sometimes are still unstated and unanalyzed.</u>" Policy 1.2 states: "A critical aspect of development management is to <u>mitigate negative impacts</u> created by new development: economic, <u>aesthetic, physical, environmental, and social</u>."

c) We agree with these statements and contend that both the draft motion and CEQA exemption ignore or minimize without any basis, the stadium lighting project's environmental, aesthetic, physical and social impacts. Both the draft motion and CEQA exemption presume benefits without quantifying or analyzing them relative to the impacts which are also not quantified.

**3. Commerce and Industry Element, Policies 2.1, 2.3, 4.1, 4.2, and 8.3; and Community Safety Element Policies**

These policies are mostly and correctly applied only to the Verizon wireless installation, yet they presume benefits larger than would occur.

a) Again, the wireless project should be decoupled from the lighting project which does not provide benefits consistent with these policies. Furthermore, the proposed wireless coverage would provide these benefits only within a localized area where little business (other than possibly home-based business) occurs. The same is true for any benefits associated with the Community Safety Element. The current and proposed wireless coverage maps are shown in Figures 3 and 4 below and illustrate the limited extent of new or improved wireless coverage expected.

b) Mysteriously, the draft motion under Policy 4.2 assumes that the lighting project will enhance the business climate from hosting sporting events. Perhaps this assertion comes directly from the original 2018 project application which states: "The lights will bring people to the neighborhood, increasing business for local restaurants and stores." However, there are very few businesses within walking distance of the school that might benefit from an influx of pre- or post-game attendees as shown in Figure 5 below.

c) Visitor Trade Policy 8.3 is also mis-applied in the draft motion since the policy states: "Assure that areas of <u>particular visitor attraction</u> are provided with adequate public services…" Even if applicable to just the Verizon wireless installation, there is no basis upon which to declare a private school athletic field a "particular visitor attraction" nor does the new wireless coverage enhance communications in areas of the City with specific visitor attractions (see Figure 4).

**Figure 3. Verizon Current Coverage Map (the project location is identified as Sunset & Noriega in the map center)**

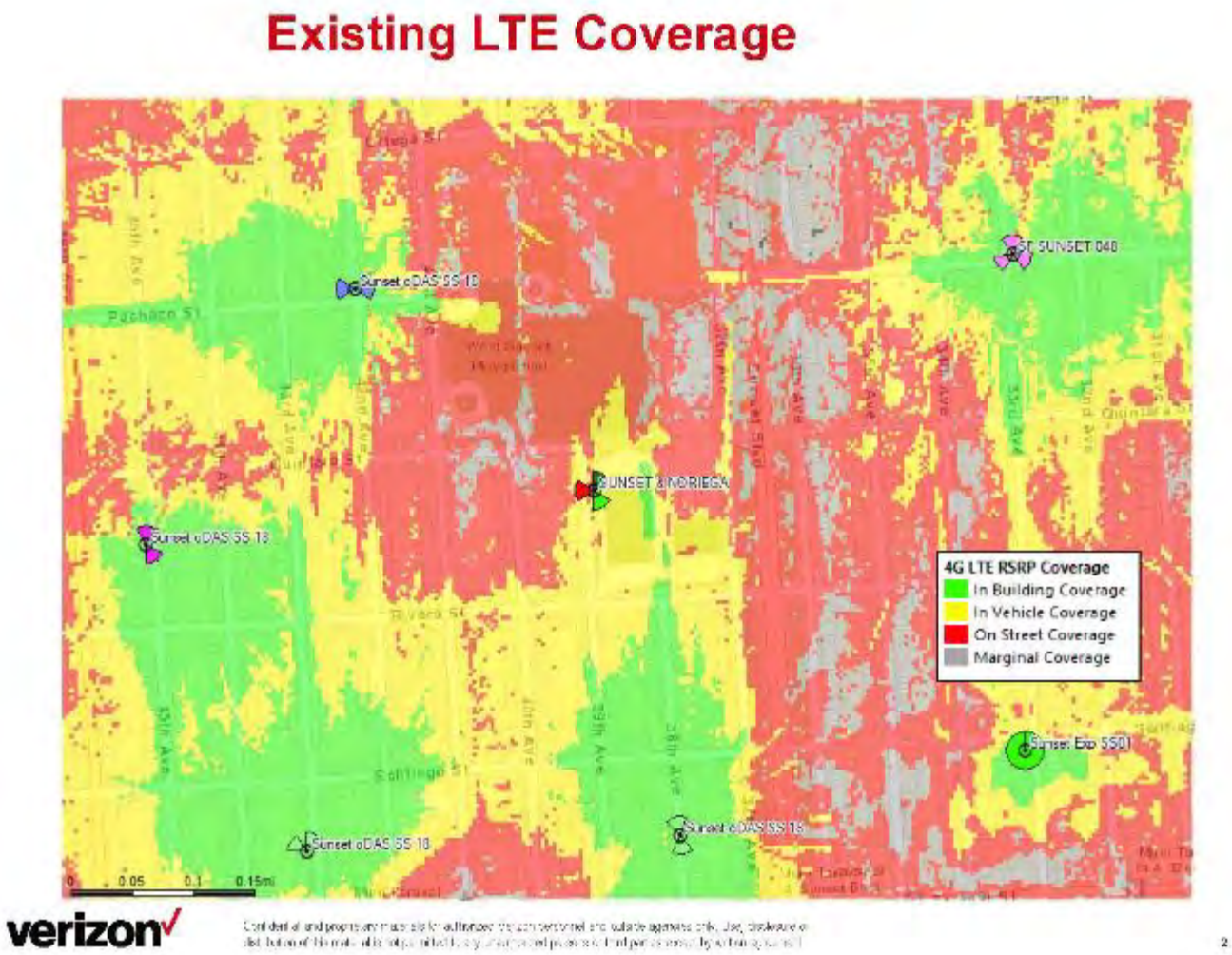

**Figure 4. Verizon Coverage Map with new Wireless Installation (the project location is identified as Sunset & Noriega in the map center)**

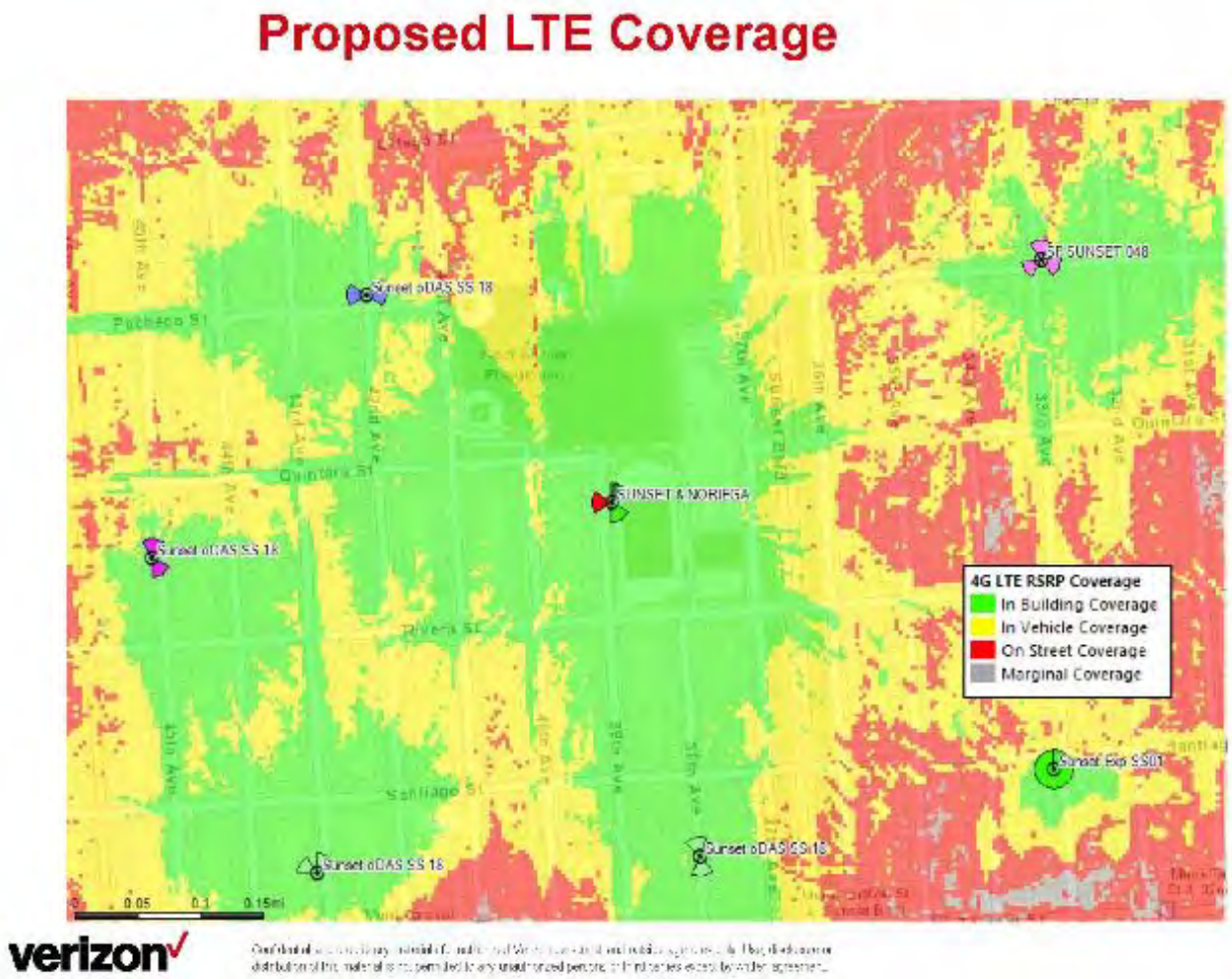

**Figure 5. Local Business Map**

## 4. Commerce and Industry Element, Policies 7.2 and 7.3

The draft motion suggests that educational services benefits would arise from the stadium lighting project, but disregards key context that must also be considered.

a) Objective 7 states: "However, future growth must be managed to achieve equitable distribution of benefits to all geographical and cultural sub-populations of the city and to minimize associated adverse effects on surrounding areas." Policy 7.2 states: "To minimize the disruption caused by institutional expansion, the city should continue its policy of reviewing expansion plans. This review examines the needs of adjacent resident areas for housing, on-street parking and safe, quiet streets as well as the needs of the institution." Policy 7.3 states, in part: "Unfortunately, the clustering of many of these major facilities in relatively few areas creates problems in the adjacent residential neighborhoods."

b) SINA's concerns with the draft motion's application of these policies are discussed in detail in our May 6, 2020 Facts and Comments 5.G and 5.H, and in our June 9, 2020 Comment 2.2. Here we simply reiterate that Saint Ignatius is an expensive private school whose benefits apply only to those students selected to attend. While the school may provide tuition assistance, it does not disclose data about the social and economic diversity of the student body or where students originate from. The school is not a neighborhood-serving school and does not provide a neighborhood benefit that could offset the stadium lighting project's adverse impacts on the neighborhood.

## 5. Commerce and Industry Element, Policy 6.9

This policy is ignored in the draft motion but is highly relevant to the stadium lighting proposal, and the additional traffic and parking strains on the neighborhood that would occur with games and practices every weeknight and some weekend nights during the school year.

a) The policy goes into great detail about conducting evaluations of traffic and parking and requires consideration of the surrounding residential neighborhoods. Most importantly, the Policy states that the proposed use should not be allowed if there is significant traffic congestion or inadequate parking.

b) The policy details what a traffic and parking analysis should involve including obtaining estimates of numbers of people and trips generated; the level of parking problems and shortages especially (but not only) during peak traffic hours; the level of additional traffic in adjacent neighborhoods; and pedestrian circulation and the potential for pedestrian/vehicle conflicts.

c) We reiterate Comment 5.C in our May 6, 2020 submittal and Comments 1.2 and 2.2 in our June 9, 2020 submittal. Namely, that a valid traffic and parking study must be conducted in order to quantify these impacts before determining if they are minimal or not. As noted above for noise in the Environmental Protection Element, it is impossible during the current COVID situation to obtain a valid baseline or to test *in situ* project-related impacts on traffic and parking. We reiterate our contention that the project

should not be approved until a valid traffic and parking study can be conducted and confirms no adverse impacts.

**6. Housing Element, Policy 10.1**

This policy is not included in the draft motion but provides important context relevant to the lighting project. The policy states in part**: "**There is a clear public benefit to creating, and applying, a strict approach to regulatory land use controls." This statement is more applicable to Comments 1.2 and 2.2 in our June 9, 2020 submittal related to CEQA and to the Planning Code as applied in the RH-1 district for this project. The school requests a rear yard modification that would allow two of the stadium lights and the Verizon wireless ground-based installation directly inside the property line. The project is exempt from the 40-foot height restriction as "light standards" or alternatively as "wireless communications facilities". As noted above, the bulk of the light arrays at each of the pole tops would be huge and we contend that these abnormal applications of the planning code (and CEQA) ignore the spirit and intent of the General Plan's strict approach.

**7. Housing Element, Policy 11.3**

This policy is also ignored in the draft motion. The policy states: "Ensure growth is accommodated without substantially and adversely impacting existing residential neighborhood character." Our prior and current comments detail the many ways that the stadium lighting project would adversely substantially, adversely, and permanently impact the neighborhood.

**8. Housing Element, Policy 11.8**

The draft motion includes this policy which states: "The scale and design of permitted commercial and institutional buildings should acknowledge and respond to the surrounding neighborhood context, incorporating neighborhood specific design guidelines whenever possible."

a) The draft motion twists the intent of this policy in a bizarre way, by stating: "the Project will minimize disruption by expanding the school vertically on the existing campus, which has been a part of the neighborhood since 1969."

b) We commented on this in Comment 2.2 of our June 9, 2020 but it remains a baffling and extremely weak argument and is certainly not within the spirit or intent of the General Plan. Furthermore, the school has been in the neighborhood for over 50 years and has undertaken numerous expansions that have incrementally changed the nature and character of the surrounding neighborhood. The proposed stadium lights would be the most glaring addition and would be grossly out of scale with the neighborhood.

## 9. Urban Design Element

The draft motion completely ignores the Urban Design Element although there are several important policies that are very relevant to the stadium lighting project.

a) Policy 1.1 addresses the importance of protecting major views in the city. It states: "Overlooks and other viewpoints for appreciation of the city and its environs should be protected and supplemented, by limitation of buildings and other obstructions where necessary…Visibility of open spaces, especially those on hilltops, should be maintained and improved..." The addition of four 90-foot poles with large lighting arrays at the top in an area with 40-foot height restrictions would clearly constitute an obstruction that would adversely impact viewpoints from locations such as Golden Gate Heights Park, Larson Peak, and Sunset Reservoir Park which all have sweeping views of the Sunset District and ocean.

b) Policy 1.12 states: "There are other developed areas which, though they may not contain individual buildings that are historic or otherwise outstanding, have a special character worthy of preservation. These areas have an unusually fortunate relationship of building scale, landscaping, topography and other attributes that makes them indispensable to San Francisco's image. Threats to the character of these areas are sure to be met with intense concern by their own residents and by the public at large." We contend that the Outer Sunset District has these qualities and a majority of immediate neighbors strongly oppose, and the public at large would also oppose, these stadium lights which will create a huge visual blight on the landscape during both daytime and nighttime and clearly threaten the character of this area. At this time, SINA is aware of at least 73% of residents on the closest blocks of 39th Avenue and Rivera Street who have explicitly opposed the lighting project. In the next closest blocks on Rivera and Quintara Streets at least 83% of residents are opposed, as are at least 50% of residents on the closest block of 40th Avenue.

c) Objective 2 covers conservation of resources. In the table entitled Fundamental Principles for Conservation, item #17 states: "Blocking, construction or other impairment of pleasing street views of the Bay or Ocean, distant hills, or other parts of the city can destroy an important characteristic of the unique setting and quality of the city." The addition of 90-foot poles with large arrays would certainly impair pleasing street views from uphill toward the ocean and from downhill toward the hills.

d) Objective 3 covers neighborhood environments and states: "Studies show that the outstanding concerns of people today in their neighborhood environment are matters of health and safety. Traffic is the leading issue, with automobiles moving through residential areas in large volumes and at high speeds, producing noise and pollutants and putting pedestrians in constant danger. With each increase in traffic the streets become less a part of the living environment and more a world of their own. Residents find the streets unsafe and unpleasant, and try to shut them out…Some neighborhoods have greater needs because their residents live in conditions of greater density, or because the residents include more children and older people who tend to live within a smaller world in which the resources close at hand are the most important." The neighborhood surrounding the

school has a large population of elderly and families with small children, as well as two public schools, a library, playground, and public recreation area used by neighborhood children and adults would be most affected by the increased traffic and related health and safety impacts that the stadium lighting project would bring.

e) Objective 4 covers improving neighborhood environments to increase personal safety, comfort, pride and opportunity. Policy 4.1 states: "In order to reduce the hazards and discomfort of traffic in residential neighborhoods, a plan for protected residential areas should be put into effect…The speed and volume of traffic on protected streets should be limited by all practical means." We note that the area surrounding the school between Noriega and Taraval Streets is a protected residential area[17] and this designation should be taken into consideration when considering traffic impacts from the project.

f) Policy 4.1.4 states: "Other clutter is produced by elements placed in the street areas. The undergrounding of overhead wires should continue at the most rapid pace possible, with the goal the complete elimination of such wires within a foreseeable period of time. Every other element in street areas, including public signs, should be examined with a view toward improvement of design and elimination of unnecessary elements." We contend that 90-foot poles with their large light arrays constitute significant clutter that is unnecessary for the neighborhood and should be avoided in the protected residential area. Furthermore, stadium lighting is not necessary for the school's athletic program to continue be successful like at other, larger schools in the City that do not have lights (see Comment 3.2 in SINA's June 9, 2020 submittal).

g) Policy 4.15 states: "In residential areas of lower density, the established form of development is protected by limitations on coverage and requirements for yards and front setbacks. These standards assure provision of open space with new buildings and maintenance of sunlight and views. Such standards, and others that contribute to the livability and character of residential neighborhoods, should be safeguarded and strengthened." We contend that allowing the school to modify its rear yard restriction down to virtually no setback in an RH-1 district and allowing 90-foot poles in a 40-foot height district even if exempted, is inconsistent with this policy.

## C. Concluding Comments

The draft motion states: "Overall, the Department also finds the project to be necessary, desirable, and compatible with the surrounding neighborhood, and not to be detrimental to persons or adjacent properties in the vicinity. The Project complies with all relevant requirements and standards of the Planning Code and is consistent with objectives and policies of the General Plan."

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[17] https://generalplan.sfplanning.org/images/I5.urban_design/urb_map7.pdf

For all the reasons explained herein and in SINA's two prior comment submittals, we strongly refute to this conclusion. SINA has consulted with a number of key experts and we have been able to expose and detail the many compelling reasons why the Saint Ignatius Stadium Lighting project should not be approved. In addition, the Verizon wireless project should be decoupled from the lighting project and a separate application submitted to the Planning Department for that project - to ensure that impacts, benefits, and alternatives to each project are considered on their own and not conflated between the two projects.

We hope you recognize the significant gaps in the project plan, the flawed permit application, the lack of thorough CEQA review, and the project's incompatibility with the General Plan. We are particularly concerned with the lack of CEQA review and dismissal of numerous portions of the General Plan that are applicable to this project. The CEQA exemption determination states: "Based on the planning department's 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." As noted in Comment 1.2 of our June 9, 2020 submittal, we question this assertion as a valid basis for complete disregard of the potentially significant impacts of this project.

When they first proposed stadium lighting (in 2015) , Saint Ignatius hosted two in-person neighborhood discussion meetings and engaged in email communications with SINA during 2016. We engaged in open discussions with the school administration regarding their plans and the neighbors' objections. Now the school is refuses to engage further with the neighborhood community and directly answer questions or to have an open dialogue, even by remote meetings. Additionally, the school has dismissed SINA's suggestions of an alternative plan for their large night time games despite our repeated requests to jointly discuss, brainstorm, and craft a viable alternate option.

The school is giving its neighbors only one option – permanent stadium lights – impacting the neighborhood every weeknight of the school year and for up to 20 large nighttime events (up to 2,800 people) a year. The school insists these lights are necessary for their current sports programs, however SI's student body has not increased, and we are unaware of any new sports teams or activities. Permanent lighting would clearly enhance the school's exclusive reputation, recruitment efforts, and would provide a benefit to its private school students. However, if the lights are installed the adverse impacts would also be permanent.

We believe it would be impossible to mitigate for all of the potentially significant impacts of this project. Furthermore, oversight of compliance with the CUA conditions would, in practicality, fall to the neighbors – a difficult, if not impossible, and certainly unreasonable burden. We have clearly shown how these stadium lights would, in no conceivable way, benefit the public, or enhance our neighborhood or its character. We therefore urge you to not approve this stadium lighting project.

## List of Appendices

**APPENDIX A: LIGHTING CONSULTANT REPORT**

**APPENDIX B: US FISH AND WILDLIFE SERVICE IPAC REPORT OF THREATENED AND ENDANGERED SPECIES**

**APPENDIX C: BIRDS OBSERVED AT WEST SUNSET PLAYGROUND, 2015 - PRESENT**

# APPENDIX A

# LIGHTING CONSULTANT REPORT

# St. Ignatius Sports Lighting Proposal Response

Kera Lagios, LEED AP, Assoc. IALD
2020-07-20

In order to understand the impacts of the proposed lighting installation at St. Ignatius, it is important to understand several fundamental issues related to light and specifically light at night.

## A. Light Levels

The addition of the sports lighting significantly increases the quantity of light in the area, both from what it is currently, and above what is recommended by the IES (Illuminating Engineering Society), and vertical illuminances are underestimated by Musco's photometrics.

<u>1. IES recommended light levels:</u>

a. According to the IES RP-33-14_Lighting for Exterior Environments[1], lighting for low-activity pedestrian areas (residential areas) in LZ1 and LZ2 range from 0.9 fc (10 lux) horizontal, 0.19 fc (2 lux) vertical immediately near entries and exits (e.g. front doors), to 0.09 fc (1 lux) horizontal, 0.0 fc (0 lux) vertical for paths to curbs.

b. The Musco photometrics show 0.33 fc horizontal, 0.42 fc vertical at the facades of the houses directly across 39th avenue.[2] **These light levels are 2-3 times higher than recommended for those residential areas.**

c. In addition, Musco is showing 6 fc horizontally and almost 7 fc vertically at the property line, which is much higher than even a "high" pedestrian light level of 1 fc.

<u>2. Vertical illuminance is more important than horizontal in this case</u>

a. While many lighting studies focus on horizontal measurements, here we are very concerned with vertical measurements for two reasons:

   i. Given the height of the poles, the lighting impact will be more extreme on the vertical plane, and

   ii. We are concerned with "what people see" both at ground level and from the windows.

b. Musco's photometrics show the vertical illuminance of 0.42 fc (~4.2 lux) at the facades of the residences, however, this measurement is taken 3'-0" above the ground. Not only is a typical adult eye height around 5'-0" or more, this does not at all represent the amount of light entering the windows which are mostly on the 2nd level of the homes. Given the mounting heights of the lights (15',16', 22', and 65', 87', 90'), much more light will be present at eye level above grade and entering the residential windows, approx. 12'-20'

[1] "Lighting for Exterior Environments", IES RP-33-14, Illuminating Engineering Society, 2014.
[2] 2020 Musco Photometrics, St. Ignatius Prep School FB/SO, pages 11, 12.

above grade. The light levels there are going to be higher than what Musco is representing.

c. We can use LEED v4.1 Sustainable Sites, Light Pollution Reduction credit as a guideline for acceptable levels of light trespass. Following LEED we see that, measured at the centerline of 39th Avenue, on a vertical plane extending up to 33' above grade, the limits on illuminance are: 0.05 fc (0.54 lux) for LZ1, and 0.10 fc (1.07 lux) for LZ2.[3] The project's photometrics show as much as 2.6 fc at 0'-0" off the ground, 26 times the higher value (LZ2). Clearly, even if LEED is not being pursued, this is an excessive amount of light spilling off of the property.

## B. Glare and Brightness

The negative issues caused by the proposed sports lighting not only include the glare produced by the fixtures themselves, but by how much brighter the area, as a whole, will be.

1. Luminance ("brightness") is important

a. The Musco photometrics do not show measurements of luminance. Loosely speaking, luminance is a measure of "brightness". The addition of 50 fc of light across the field will turn the field itself into a bright, light reflecting surface, as well as any other surfaces nearby (sidewalks, bleachers, out-building walls, etc.). These surfaces themselves, especially when seen from the 2nd story windows of homes will have a significant deleterious impact on the nighttime environment of the neighborhood.

b. Below are two images showing the effect of a sports lighting installation on brightness of the adjacent areas. While this is a different installation, the concept of brightness is clearly illustrated.

[3] "Light Pollution Reduction - Language," LEED BD+C: New Construction v4.1 - LEED v4.1 https://www.usgbc.org/credits/new-construction-core-and-shell-schools-new-construction-retail-new-construction-healthc-163?return=/credits/New%20Construction/v4.1/Sustainable%20sites

These two photos were taken at the same facility, on opposite sides of the access road. (Left) Pointed toward the athletic field. (Right) Pointed toward the neighborhood.

*Image Source: IDA-Criteria for Community-Friendly Outdoor Sports Lighting v1.0, November 28, 2018*

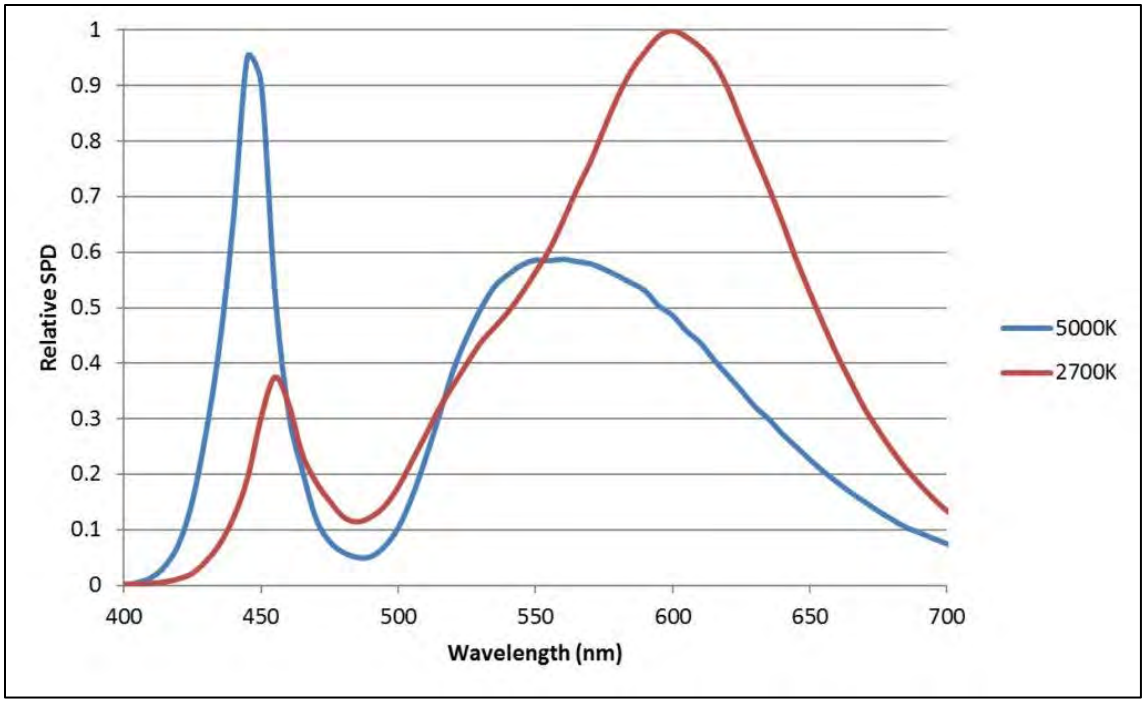
2. Glare due to nighttime scotopic v. photopic vision

a. At night, our eyes "shift" from what is called "photopic" to "mesopic" or "scotopic" vision. You've experienced this if you have come out of a dark movie theater into the daylight. In the theater, your eyes have adapted to the dark and switched over to mesopic or scotopic vision, and then attempt to switch back to photopic in the daylight.

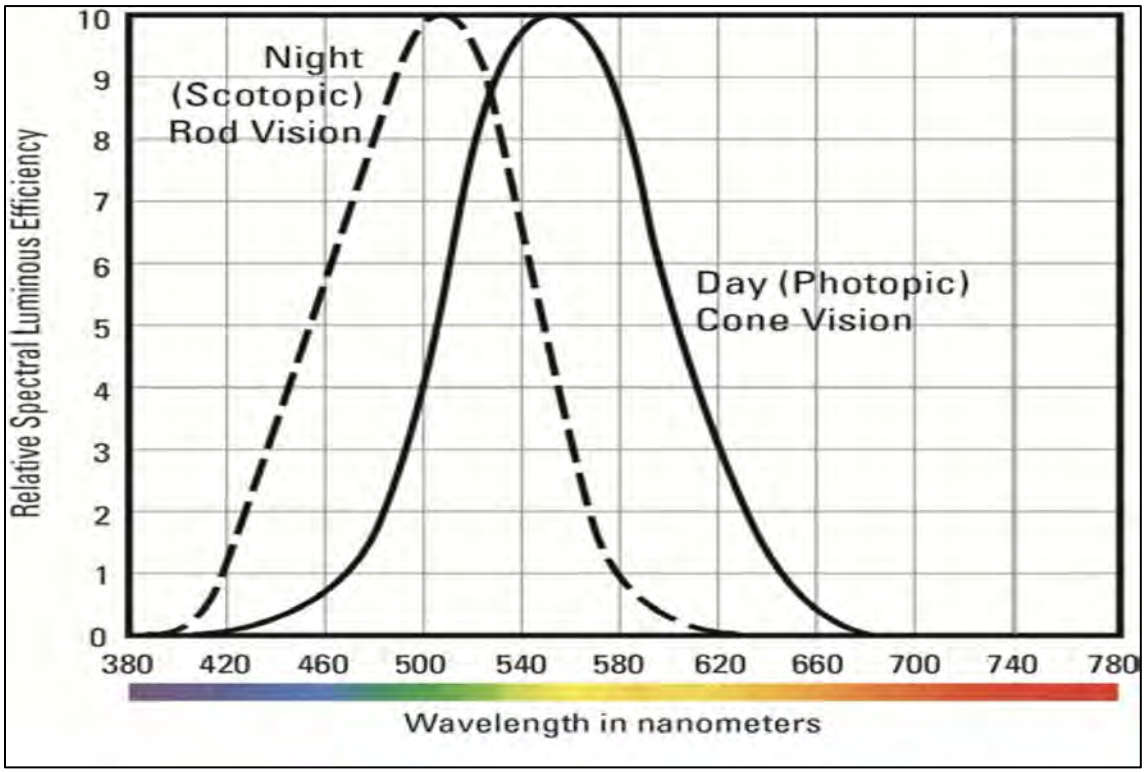
b. Scotopic and mesopic vision are more sensitive to green and blue light than photopic vision is, meaning that 'cooler' light will appear brighter than a similar light source that is more yellow.

c. The Musco lights are 5700K, which are considered very "cool" and mimic daylight In fact, 5500K is equivalent to noon-time sunlight and 6000K is equivalent to a camera's electronic flash.[4] While these are more efficient in terms of energy, they produce more glare than a similar fixture with a lower color temperature (e.g. 3000K). Thus, the same quantity of light will appear even brighter. This effect is worse for people over 65.[5]

[4] https://hci-led.com/wp-content/uploads/2015/08/Don-Werthmann-on-Kelvin.pdf
[5] "Light and Vision", IES Ready Reference App, Illuminating Engineering Society, 2020.




*Notice the larger peak in the 440-450 nm range with the 5000k (cooler) LED source, as opposed to the 2700K (warmer) LED source. This is significant for scotopic sensitivity as well as melanopic sensitivity.*
*Image source: [https://www.allthingslighting.org/index.php/2019/02/15/filtered-leds-and-light-pollution/](https://www.allthingslighting.org/index.php/2019/02/15/filtered-leds-and-light-pollution/)*




*Notice how the Night (Scotopic) peak is shifted to the left, closer to the blue and green wavelengths (around 500 nm).*
*Image source: "Light and Vision", IES Ready Reference App, Illuminating Engineering Society, 2020.*

3. Glare (Musco lights)

a. In Musco's diagram addressing glare, the facades of the houses along 39th avenue are mostly in the yellow band, indicating 1,000 to 5,000 candela. By Musco's own legend, this is not negligible in terms of the amount of glare (which they indicate as <= 500 candela).[6]

b. Musco has not provided the IES files for their luminaires. As such it is not possible to do a separate analysis of the installation, particularly the characteristics of the luminaires as they relate to glare, backlight and uplight.

c. It should be noted, that while Musco provided a diagram showing their TLC technology emits fewer candelas than other sources[7], it is not clear which luminaire is being used in that diagram, nor how many are used in the proposed installation.

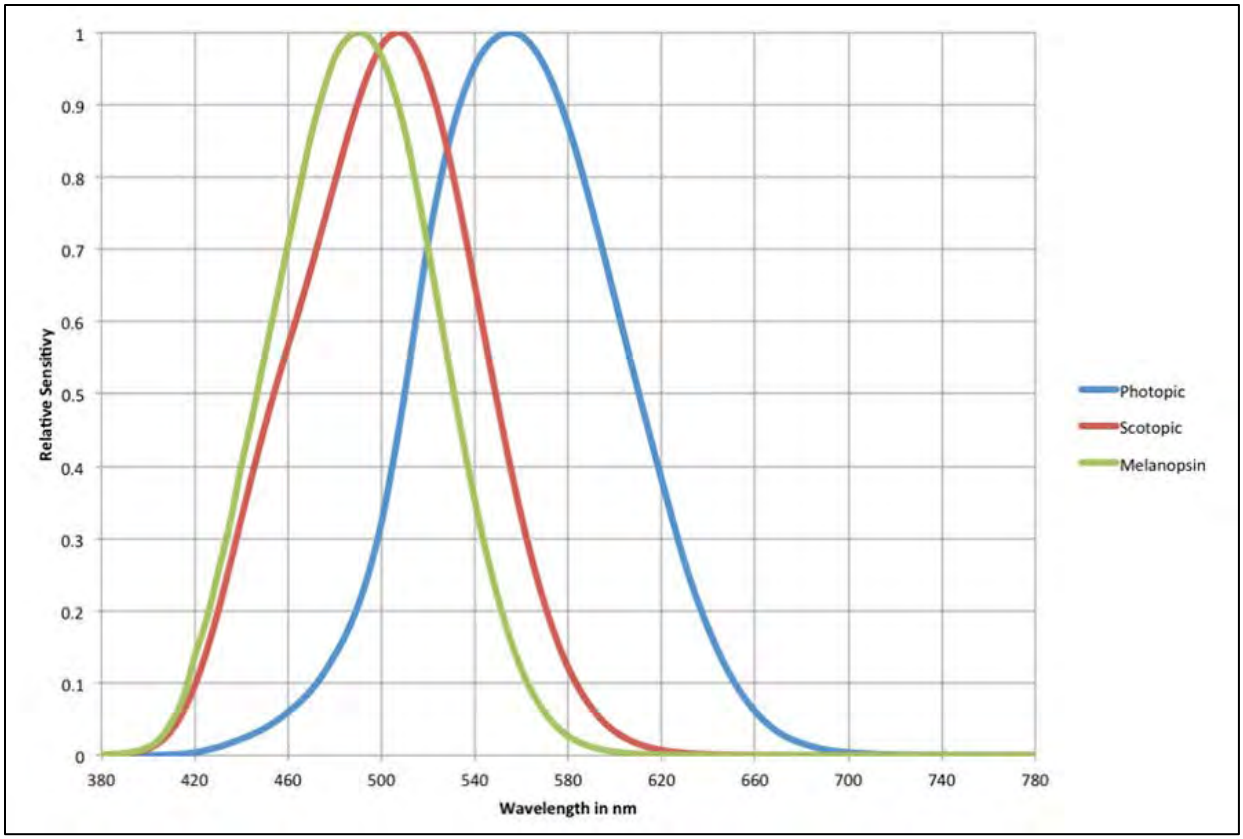
d. While the Musco fixtures may be better than other sources/installations, due to the proximity and duration of the proposed lighting and schedule, it is still too much for this residential area.

## C. Light + Health

Research over the past few decades has shown that our bodies regulate our health in part due to the natural cycle of light and dark, called the circadian cycle.[8] Disruptions to that cycle have been shown to impact health through changes to hormones, sleep and body temperature. The regulation of circadian rhythms by light is controlled by suppression of melatonin. In the morning, bright, blue light suppresses melatonin and encourages us to wake up, and later in the evening, lower light levels help to stimulate melatonin and encourage our bodies to go to sleep.

It should be noted that the cells in the eye that control this are different than the rods and cones that control vision. These cells (called intrinsically photosensitive retinal ganglion cells or "iprgcs") respond to light differently and are most sensitive to light in the blue range around 480 nm, and this system is termed "melanopic".

[6] 2020 Musco Photometrics, St. Ignatius Prep School FB/SO, page 18.
[7] Evolution of Light Control - Musco - St. Ignatius Light Poles.
[8] Light and Human Health: An Overview of the Impact of Optical Radiation on Visual, Circadian, Neuroendocrine and Neurobehavioral Responses, IES TM-18-18, Illuminating Engineering Society, 2018.




*Graph showing photopic, scotopic and melanopic responses to visible wavelengths of light showing differing peak sensitivities.*
*Image source: https://www.ies.org/fires/simplifying-melanopsin-metrology/*

1. Circadian rhythms are affected by many things including: the age of the individual, recent sleep patterns, time during the day/night when blue light is present, quantity of blue light, duration of exposure to blue light, and angle/location of the light.[9]

a. The Musco lights, as mentioned, are 5700K CCT (correlated color temperature) which are "blue-er" lights than, say a 3000K source. There is a larger percentage of the light emitted in the 480 nm range, which stimulates the melanopic system. Therefore, it has a greater tendency to disrupt the circadian system.

b. Because the circadian system responds to the quantity of light received at eye level, the higher vertical illuminances created by the Musco lights are going to elevate the impact.

c. Most importantly, the lights will be on for up to 55% of the entire year and virtually every weeknight during the school year, for up to 4 or 5 hours at a time in winter. This significant increase in the quantity and duration of blue-enriched light during dark hours has the potential to have significant impacts on circadian health, especially in children who are much more vulnerable to such disruptions.

[9] Light and Human Health: An Overview of the Impact of Optical Radiation on Visual, Circadian, Neuroendocrine and Neurobehavioral Responses, IES TM-18-18, Illuminating Engineering Society, 2018.

## D. Light pollution

Finally, the Musco lights will negatively affect light pollution in the area, particularly due to the frequency of fog, and they will have a potential negative effect on the ecosystems in the relatively nearby ocean and shoreline habitats.

1. Fog increases the light pollution because it both disperses light through the water molecules suspended in the air and serves as an outdoor “ceiling” which the light bounces off of and distributes back down to the ground.

2. Musco has not provided the IES photometric data files (.ies files) or any report on the photometric distribution of the luminaires, so it is not possible to evaluate the BUG (backlight-uplight-glare) ratings of the selected luminaires to evaluate their characteristics. Typically, sports lighting is not well shielded in any direction and contributes greatly to light pollution as the luminaires are angled. In order to verify any claims of shielding, Musco needs to provide the IES files and luminaire photometric report.

3. Like humans, animals and plants also have circadian rhythms which are impacted by changes in light and dark. Sea turtles are probably the most well-known example of animals whose reproductive processes are disrupted by light levels near beaches, however, other plants and animals are susceptible as well. [10]

[10] “Lighting for Exterior Environments”, IES RP-33-14, Illuminating Engineering Society, 2014.

# APPENDIX B

# US FISH AND WILDLIFE SERVICE IPAC REPORT OF THREATENED AND ENDANGERED SPECIES

**IPaC** Information for Planning and Consultation **U.S. Fish & Wildlife Service**

# IPaC resource list

**This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be** directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

NOT FOR CONSULTATION

## Location

San Francisco County, California

## Local office

**Sacramento Fish And Wildlife Office**

(916) 414-6600
(916) 414-6713

# Endangered species

**This resource list is for informational purposes only and does not constitute an analysis of project level impacts.**

**The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move,** and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this **list. Please contact** NOAA Fisheries **for** species under their jurisdiction.

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1. **Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information.**
2. **NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.**

**The following species are potentially affected by activities in this location:**

NOT FOR CONSULTATION

# Mammals

| NAME | STATUS |
|---|---|
| **Salt Marsh Harvest Mouse** Reithrodontomys raviventris<br>No critical habitat has been designated for this species.<br>https://ecos.fws.gov/ecp/species/613 | **Endangered** |
| **Southern Sea Otter** Enhydra lutris nereis<br>No critical habitat has been designated for this species.<br>https://ecos.fws.gov/ecp/species/8560 | **Threatened**<br>Marine mammal |

# Birds

| NAME | STATUS |
|---|---|
| California Clapper Rail Rallus longirostris obsoletus<br>No critical habitat has been designated for this species.<br>https://ecos.fws.gov/ecp/species/4240 | Endangered |
| California Least Tern Sterna antillarum browni<br>No critical habitat has been designated for this species.<br>https://ecos.fws.gov/ecp/species/8104 | Endangered |
| Marbled Murrelet Brachyramphus marmoratus<br>There is **final** critical habitat for this species. Your location is outside the critical habitat.<br>https://ecos.fws.gov/ecp/species/4467 | Threatened |
| Short-tailed Albatross Phoebastria (=Diomedea) albatrus<br>No critical habitat has been designated for this species.<br>https://ecos.fws.gov/ecp/species/433 | Endangered |
| Western Snowy Plover Charadrius nivosus nivosus<br>There is **final** critical habitat for this species. Your location is outside the critical habitat.<br>https://ecos.fws.gov/ecp/species/8035 | Threatened |
| **Yellow-billed Cuckoo** Coccyzus americanus<br>There is **proposed** critical habitat for this species. Your location is outside the critical habitat.<br>https://ecos.fws.gov/ecp/species/3911 | **Threatened** |

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# Reptiles

| NAME | STATUS |
|---|---|
| **Green Sea Turtle** Chelonia mydas<br>**No critical habitat has been designated for this species.**<br>https://ecos.fws.gov/ecp/species/6199 | **Threatened** |
| **San Francisco Garter Snake** Thamnophis sirtalis tetrataenia<br>**No critical habitat has been designated for this species.**<br>https://ecos.fws.gov/ecp/species/5956 | **Endangered** |

# Amphibians

| NAME | STATUS |
|---|---|
| California Red-legged Frog Rana draytonii<br>There is **final** critical habitat for this species. Your location is outside the critical habitat.<br>https://ecos.fws.gov/ecp/species/2891 | Threatened |

# Fishes

| NAME | STATUS |
|---|---|
| Delta Smelt Hypomesus transpacificus<br>There is **final** critical habitat for this species. Your location is outside the critical habitat.<br>https://ecos.fws.gov/ecp/species/321 | Threatened |
| Tidewater Goby Eucyclogobius newberryi<br>There is **final** critical habitat for this species. Your location is outside the critical habitat.<br>https://ecos.fws.gov/ecp/species/57 | Endangered |

# Insects

| NAME | STATUS |
|---|---|
| **Bay Checkerspot Butterfly** Euphydryas editha bayensis<br>**There is final critical habitat for this species. Your location is outside the critical habitat.**<br>https://ecos.fws.gov/ecp/species/2320 | **Threatened** |

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**Callippe Silverspot Butterfly** Speyeria callippe callippe — **Endangered**
There is **proposed** critical habitat for this species. The location of the critical habitat is not available.
https://ecos.fws.gov/ecp/species/3779

**Mission Blue Butterfly** Icaricia icarioides missionensis — **Endangered**
There is **proposed** critical habitat for this species. The location of the critical habitat is not available.
https://ecos.fws.gov/ecp/species/6928

Myrtle's Silverspot Butterfly Speyeria zerene myrtleae — Endangered
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/6929

San Bruno Elfin Butterfly Callophrys mossii bayensis — Endangered
There is **proposed** critical habitat for this species. The location of the critical habitat is not available.
https://ecos.fws.gov/ecp/species/3394

# Flowering Plants

| NAME | STATUS |
|---|---|
| Franciscan Manzanita Arctostaphylos franciscana<br>There is **final** critical habitat for this species. Your location is outside the critical habitat.<br>https://ecos.fws.gov/ecp/species/5350 | Endangered |
| Marin Dwarf-flax Hesperolinon congestum<br>No critical habitat has been designated for this species.<br>https://ecos.fws.gov/ecp/species/5363 | Threatened |
| Marsh Sandwort Arenaria paludicola<br>No critical habitat has been designated for this species.<br>https://ecos.fws.gov/ecp/species/2229 | Endangered |
| **Presidio Clarkia** Clarkia franciscana<br>**No critical habitat has been designated for this species.**<br>https://ecos.fws.gov/ecp/species/3890 | **Endangered** |

NOT FOR CONSULTATION

**Presidio Manzanita** Arctostaphylos hookeri var. ravenii **Endangered**
**No critical habitat has been designated for this species.**
https://ecos.fws.gov/ecp/species/7216

**Robust Spineflower** Chorizanthe robusta var. robusta **Endangered**
**There is final critical habitat for this species. Your location is outside the critical habitat.**
https://ecos.fws.gov/ecp/species/9287

**San Francisco Lessingia** Lessingia germanorum (=L.g. var. germanorum) **Endangered**
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/8174

Showy Indian Clover Trifolium amoenum Endangered
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/6459

White-rayed Pentachaeta Pentachaeta bellidiflora Endangered
No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/7782

NOT FOR CONSULTATION

## Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

# Migratory birds

**Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].**

**Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.**

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1. The Migratory Birds Treaty Act of 1918.

2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php
- Measures for avoiding and minimizing impacts to birds http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php
- Nationwide conservation measures for birds http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

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| NAME | BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.) |
|---|---|

**Allen's Hummingbird** Selasphorus sasin — **Breeds Feb 1 to Jul 15**

**This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.**
https://ecos.fws.gov/ecp/species/9637

**Bald Eagle** Haliaeetus leucocephalus — **Breeds Jan 1 to Aug 31**

**This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.**
https://ecos.fws.gov/ecp/species/1626

Black Oystercatcher Haematopus bachmani — Breeds Apr 15 to Oct 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9591

Black Swift Cypseloides niger — Breeds Jun 15 to Sep 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/8878

Black Turnstone Arenaria melanocephala — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Burrowing Owl Athene cunicularia — Breeds Mar 15 to Aug 31

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/9737

Clark's Grebe Aechmophorus clarkii — Breeds Jan 1 to Dec 31

This is a Bird of Conservation Concern (BCC) throughout its range in **the continental USA and Alaska.**

**Common Yellowthroat** Geothlypis trichas sinuosa — **Breeds May 20 to Jul 31**

**This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA**
https://ecos.fws.gov/ecp/species/2084

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**Costa's Hummingbird** Calypte costae — **Breeds Jan 15 to Jun 10**

**This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA**
https://ecos.fws.gov/ecp/species/9470

**Golden Eagle** Aquila chrysaetos — **Breeds Jan 1 to Aug 31**

**This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.**
https://ecos.fws.gov/ecp/species/1680

Lawrence's Goldfinch Carduelis lawrencei — Breeds Mar 20 to Sep 20

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9464

Lewis's Woodpecker Melanerpes lewis — Breeds Apr 20 to Sep 30

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9408

Long-billed Curlew Numenius americanus — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/5511

Marbled Godwit Limosa fedoa — Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9481

Nuttall's Woodpecker Picoides nuttallii — Breeds Apr 1 to Jul 20

**This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA**
https://ecos.fws.gov/ecp/species/9410

**Oak Titmouse** Baeolophus inornatus — **Breeds Mar 15 to Jul 15**

**This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.**
https://ecos.fws.gov/ecp/species/9656

NOT FOR CONSULTATION

| | |
|---|---|
| **Rufous Hummingbird** selasphorus rufus<br>**This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.**<br>**https://ecos.fws.gov/ecp/species/8002** | **Breeds elsewhere** |
| **Short-billed Dowitcher** Limnodromus griseus<br>**This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.**<br>**https://ecos.fws.gov/ecp/species/9480** | **Breeds elsewhere** |
| Song Sparrow Melospiza melodia<br>This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA | Breeds Feb 20 to Sep 5 |
| Spotted Towhee Pipilo maculatus clementae<br>This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA<br>https://ecos.fws.gov/ecp/species/4243 | Breeds Apr 15 to Jul 20 |
| Tricolored Blackbird Agelaius tricolor<br>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.<br>https://ecos.fws.gov/ecp/species/3910 | Breeds Mar 15 to Aug 10 |
| Whimbrel Numenius phaeopus<br>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.<br>https://ecos.fws.gov/ecp/species/9483 | Breeds elsewhere |
| Willet Tringa semipalmata<br>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. | Breeds elsewhere |
| **Wrentit** Chamaea fasciata<br>**This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.** | **Breeds Mar 15 to Aug 10** |

NOT FOR CONSULTATION

# Probability of Presence Summary

**The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ**

"Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

**Probability of Presence ( )**

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

**Breeding Season ( )**
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

**Survey Effort (|)**
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

**No Data (–)**
A week is marked as having no data if there were no survey events for that week.

**Survey Timeframe**
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

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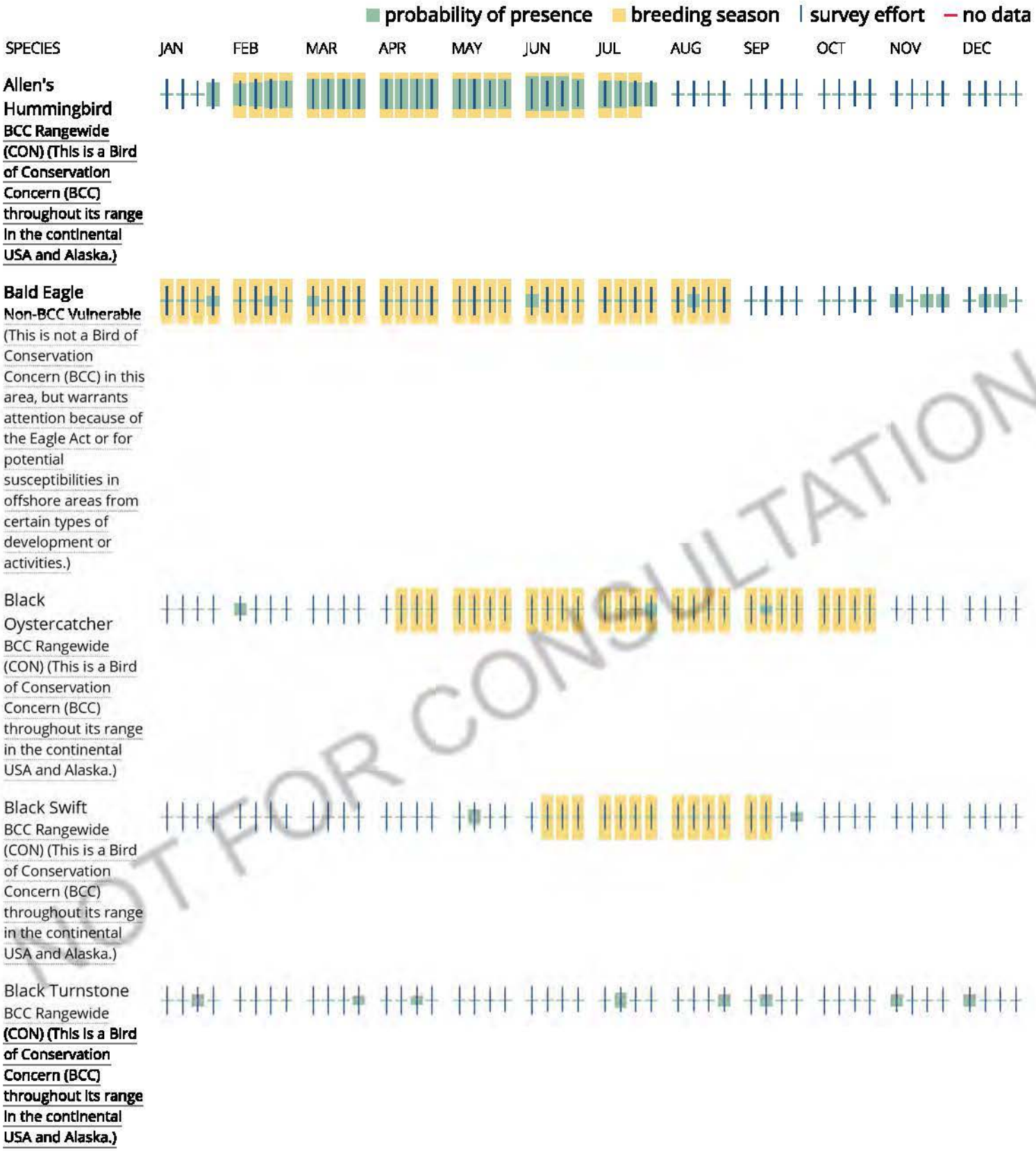


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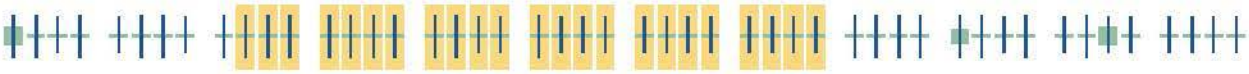
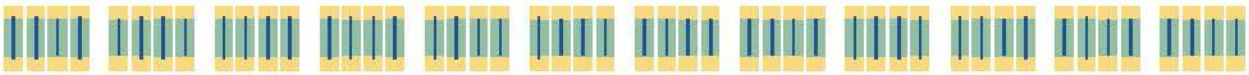
**Burrowing Owl**
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)



**Clark's Grebe**
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

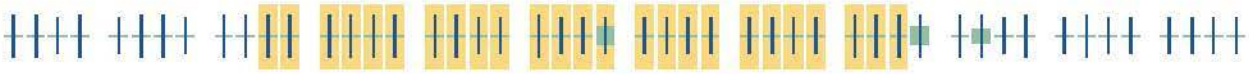


Common Yellowthroat
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Costa's Hummingbird
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Golden Eagle
Non-BCC Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

**Lawrence's Goldfinch**
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



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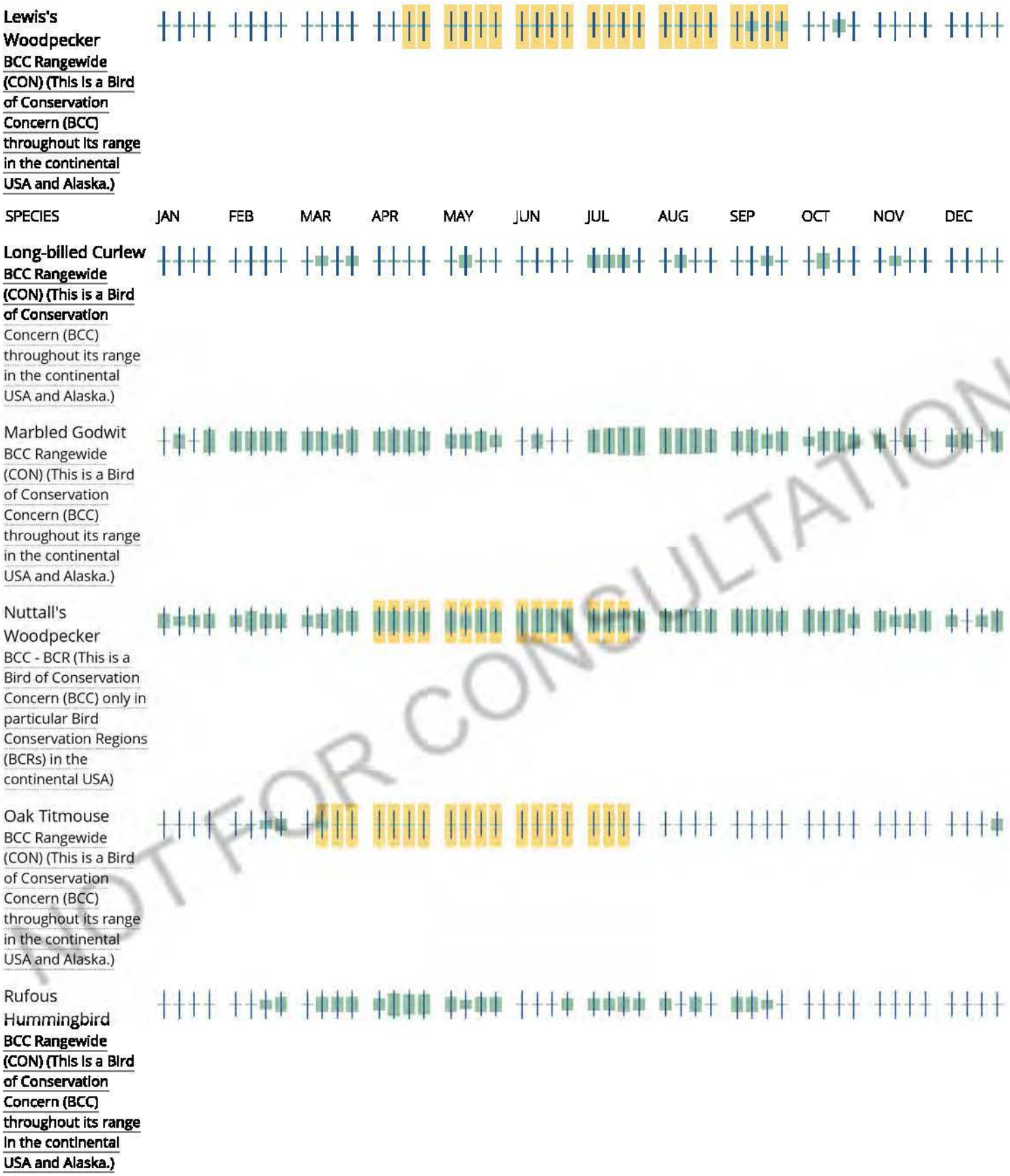


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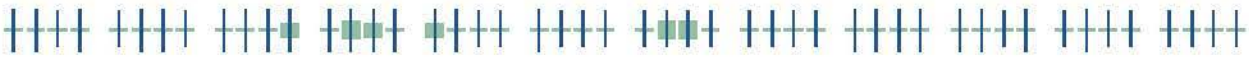
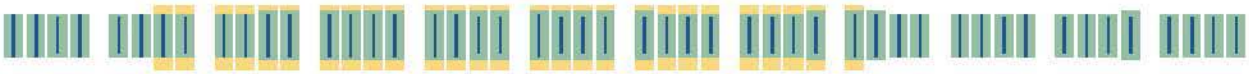
**Short-billed Dowitcher**
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



**Song Sparrow**
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

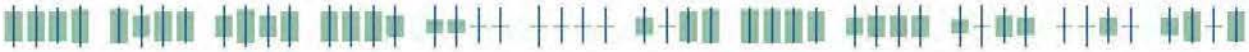


Spotted Towhee
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Tricolored Blackbird
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Whimbrel
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Willet
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



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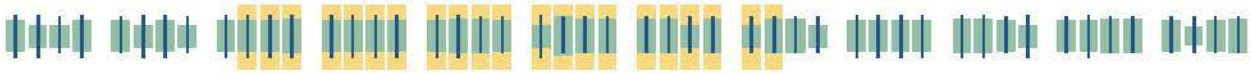
Wrentit
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental

USA and Alaska.)



**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures and/or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

**What does IPaC use to generate the migratory birds potentially occurring in my specified location?**

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the AKN Phenology Tool.

**What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets .

**Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.**

**How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?**

**To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: The Cornell Lab of Ornithology All About Birds Bird Guide,**

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or (if you are unsuccessful in locating the bird of interest there), the Cornell Lab of Ornithology Neotropical Birds guide. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

### What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

### Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a

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red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

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# APPENDIX C

# BIRDS OBSERVED AT WEST SUNSET PLAYGROUND, 2015 - PRESENT

Birds Observed at West Sunset Playground
Source: Ebird https://ebird.org/hotspot/L6317907?yr=all&m= Accessed July 20, 2020

| | Species Name | Count | Date |
|---|---|---|---|
| 1 | Killdeer | 1 | 30 Mar 2020 |
| 2 | Rock Pigeon | 6 | 18 Jan 2020 |
| 3 | Mourning Dove | 1 | 18 Jan 2020 |
| 4 | Anna's Hummingbird | 1 | 18 Jan 2020 |
| 5 | Western Gull | 6 | 18 Jan 2020 |
| 6 | Black Phoebe | 1 | 18 Jan 2020 |
| 7 | European Starling | 26 | 18 Jan 2020 |
| 8 | House Sparrow | 6 | 18 Jan 2020 |
| 9 | Tricolored Blackbird | 25 | 18 Jan 2020 |
| 10 | Brewer's Blackbird | 40 | 18 Jan 2020 |
| 11 | American Crow | 4 | 2 Jan 2020 |
| 12 | Common Raven | 2 | 2 Jan 2020 |
| 13 | Chestnut-backed Chickadee | 1 | 2 Jan 2020 |
| 14 | Ruby-crowned Kinglet | 1 | 2 Jan 2020 |
| 15 | Pygmy Nuthatch | 3 | 2 Jan 2020 |
| 16 | American Robin | 4 | 2 Jan 2020 |
| 17 | House Finch | 2 | 2 Jan 2020 |
| 18 | Dark-eyed Junco | 4 | 2 Jan 2020 |
| 19 | White-crowned Sparrow | 12 | 2 Jan 2020 |
| 20 | Yellow-rumped Warbler | 5 | 2 Jan 2020 |
| | blackbird sp. | 15 | 26 Nov 2019 |
| 21 | Eurasian Collared-Dove | 2 | 10 Nov 2019 |
| 22 | Brown-headed Cowbird | 2 | 10 Nov 2019 |
| 23 | Townsend's Warbler | 1 | 10 Nov 2019 |
| 24 | Red-necked Phalarope | 6 | 21 Aug 2019 |
| 25 | Lark Sparrow | 1 | 12 Aug 2019 |
| 26 | Turkey Vulture | 1 | 14 Apr 2019 |
| 27 | Peregrine Falcon | 1 | 14 Apr 2019 |
| 28 | Hooded Oriole | 1 | 31 Mar 2019 |
| 29 | Merlin | 1 | 28 Mar 2019 |
| 30 | Barn Owl | 1 | 21 Mar 2019 |
| 31 | Western Bluebird | 2 | 5 Feb 2019 |
| 32 | Red-tailed Hawk | 1 | 26 Jan 2019 |

| | Species Name | Count | Date |
|---|---|---|---|
| 33 | California Gull | 15 | 20 Jan 2019 |
| | Larus sp. | 30 | 20 Jan 2019 |
| 34 | Northern Flicker | 1 | 20 Jan 2019 |
| 35 | Say's Phoebe | 1 | 20 Jan 2019 |
| 36 | Bushtit | 16 | 20 Jan 2019 |
| | Zonotrichia sp. | 4 | 20 Jan 2019 |
| 37 | California Towhee | 1 | 20 Jan 2019 |
| 38 | Cooper's Hawk | 1 | 2 Jan 2019 |
| 39 | Lesser Goldfinch | 2 | 21 Oct 2018 |
| 40 | Yellow Warbler | 1 | 23 Sep 2018 |
| 41 | Osprey | 1 | 9 Sep 2018 |
| | shorebird sp. | 1 | 3 Sep 2018 |
| | warbler sp. (Parulidae sp.) | 2 | 3 Sep 2018 |
| 42 | Canada Goose | 11 | 26 Aug 2018 |
| 43 | Double-crested Cormorant | 2 | 26 Aug 2018 |
| 44 | White-tailed Kite | 1 | 5 Aug 2018 |
| 45 | American Goldfinch | 1 | 1 Apr 2018 |
| 46 | Tropical Kingbird | 1 | 31 Mar 2018 |
| 47 | Mallard | 3 | 27 Mar 2018 |
| 48 | Barn Swallow | 1 | 27 Mar 2018 |
| 49 | Red-shouldered Hawk | 1 | 26 Mar 2018 |
| 50 | Red-breasted Nuthatch | 2 | 18 Mar 2018 |
| 51 | Golden-crowned Sparrow | 2 | 18 Mar 2018 |
| 52 | Song Sparrow | 1 | 18 Mar 2018 |
| 53 | Spotted Towhee | 1 | 18 Mar 2018 |
| 54 | Red-winged Blackbird | 1 | 18 Mar 2018 |
| | gull sp. | 1 | 2 Mar 2018 |
| 55 | Pine Siskin | 2 | 25 Feb 2018 |
| 56 | Fox Sparrow | 1 | 25 Feb 2018 |
| 57 | Northern Pintail | 4 | 10 Dec 2017 |
| 58 | Glaucous-winged Gull | 1 | 10 Dec 2017 |
| | pigeon/dove sp. | 1 | 26 Nov 2017 |
| 59 | Orange-crowned Warbler | 1 | 26 Nov 2017 |
| 60 | Cedar Waxwing | 5 | 20 Nov 2017 |
| 61 | Downy Woodpecker | 1 | 11 Nov 2017 |
| 62 | Purple Finch | 1 | 11 Nov 2017 |

| | Species Name | Count | Date |
|---|---|---|---|
| 63 | American Pipit | 7 | 7 Oct 2017 |
| 64 | California Scrub-Jay | 2 | 2 Oct 2017 |
| 65 | Great Blue Heron | 1 | 10 Mar 2017 |
| 66 | Wilson's Snipe | 1 | 20 Nov 2016 |
| | peep sp. | 1 | 28 Aug 2016 |
| | passerine sp. | 2 | 28 Aug 2016 |
| 67 | Hermit Thrush | 1 | 19 Jan 2015 |

| | |
|---|---|
| **From:** | SISunsetNeighbors @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 11:33:38 AM |
| **Attachments:** | Outlook-hhvbttbd.png<br>BOS File #200992 and #200996 - SINA Commission Submittal 1 - 2020_05_06.pdf<br>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

| | |
|---|---|
| **From:** | Daniel McCarthy |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Re: File No. 200992 and 200996 // Lights at JB Murphy Field @ St Ignatius |
| **Date:** | Thursday, September 17, 2020 11:07:01 AM |

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Dear President Norman Yee and Members of the San Francisco Board of Supervisors,

I am a third generation resident of the Sunset, fourth generation San Franciscian, and a third generation alumnus of St. Ignatius College Preparatory.
I live in the neighborhood to this day. I've chosen to buy my home, join the community, and raise my own daughter in the neighborhood I grew up in.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes
and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the
campus rather than traveling great distances to practice. In addition, I believe that well-lit sports fields can create a safer surrounding area.
St. Ignatius College Preparatory has been a hub of education and community for my
own family and has been a part of my family and community
for generations. Many of those lessons are learned through the shared experience on the field. Even the students who participate as spectators
gain a strong feeling of community by supporting their friends and fellow classmates.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration on this appeal.

Sincerely,

Daniel Colin McCarthy
3716 Taraval St
San Francisco, CA 94116
DColinMcCarthy@gmail.com

**May 6, 2020**

**Via Email To:**

Planning Commission Affairs Commissions.Secretary@sfgov.org
Jeff Horn, Senior Planner, Current Planning jeffrey.horn@sfgov.org

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

Dear Planning Commission Secretary and Mr. Horn,

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

## A: SUBMISSION IN ADVANCE OF THE PUBLIC HEARING

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

## B: REQUEST FOR CONTINUANCE

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

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

   Specifically, Saint Ignatius should prepare and provide:
   - A CEQA Environmental Impact Report to assess all potential impacts for their level of significance;
   - the traffic and parking study claimed to be completed;

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

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

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

**B: CONFLICT OF INTEREST**

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

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

Sincerely,

*Deborah Brown*

Deborah Brown, Secretary
Saint Ignatius Neighborhood Association
sisunsetneighbors@hotmail.com

Attachment: SINA Advance Submittal documentation

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

## Introduction

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

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

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

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

### Background

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

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

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

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

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

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

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

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

### Current Project Status

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

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

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

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

## Neighborhood Association Objections and Concerns

### Unclear and Misleading Project Communications

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

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

We believe this was very misleading.

**SI Seeking Stadium Lighting Approval During COVID 19 Crises**

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

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

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

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

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

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

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

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

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

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

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

**The Impact of Temporary Field Lighting**

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

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

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

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

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

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

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

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

## Summary

### The Impact of Permanent Stadium Lights

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

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

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

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

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

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

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

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

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

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

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

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

**Alternate Proposal**

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

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

SI responded that approach would not work for them.

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

## Additional Information

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

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

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

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

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

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

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

# ATTACHMENT 1

# MARIN COUNTY PLANNING DIVISION

# 2016 LETTER RE: MARIN CATHOLIC HIGH SCHOOL LIGHTING PROPOSAL

November 21, 2016

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

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

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

Dear Mr. Bentivoglio,

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

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

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

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

The following outlines a few of our key concerns:

**Light, Contrast, and Glare**

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

**Noise**

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

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

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

**Traffic**

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

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

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

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

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

Sincerely,

Jocelyn Drake
Senior Planner

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

# ATTACHMENT 2

# SINA TECHNICAL COMMENTS ON

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

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

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

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

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

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

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

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

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

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

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

CEQA exemption without further environmental evaluation. Refer also to the 2020 CEQA State Guidelines Section 15162[2].

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

a) The Determination did not include evaluation of the wireless facility portion of the project. The wireless facility is not an existing facility and constitutes a modification to the submitted stadium lighting CUA application, which provides only passing mention of the wireless facility and does not describe its impacts.

b) The Determination fails to recognize the lighting project's proposed expanded uses. The transportation review in Step 2 of the CEQA Checklist states: "*The proposed addition of lights at the existing facility would not expand the use of such facility. Instead, the proposed lights would shift the existing use to later times in the day and/or days of the week.*"

c) The Determination fails to recognize the proposed change in use and new construction. The CEQA Determination Checklist Step 4 Item 1 - "Change of use and New Construction" box is not checked although the CUA application checked both of those boxes.

d) The Determination does not include consideration of geology and soils and there is no evidence that a geotechnical report has been completed for the project.

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

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

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

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

[2] https://www.califaep.org/docs/2020_ceqa_book.pdf

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Comment 2.C:** There was plenty of time for Saint Ignatius to select and answer at least some questions during the meeting, but they did not. Therefore, full participation by even English-speaking stakeholders was denied.
Saint Ignatius did not provide a mechanism for participants to officially sign-in to the meeting nor were participants asked to provide the contact information required for a sign-in sheet to be submitted to the Department as part of the Pre-Application Meeting Packet to be filed with the Department. The Pre-Application submittal sign-in form that Saint Ignatius was supposed to use was not used and there was no other way provided to verify who participated in the meeting. The sign-in form also contains a box for people to check to request copies of project plans. Saint Ignatius did not point out that option at the meeting, so neighbors were not informed of their ability to request relevant plans.

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

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

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

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

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[4] https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=7.&chapter=3.5.&lawCode=GOV&title=1.&article=1.

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

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

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

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

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

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

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

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

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

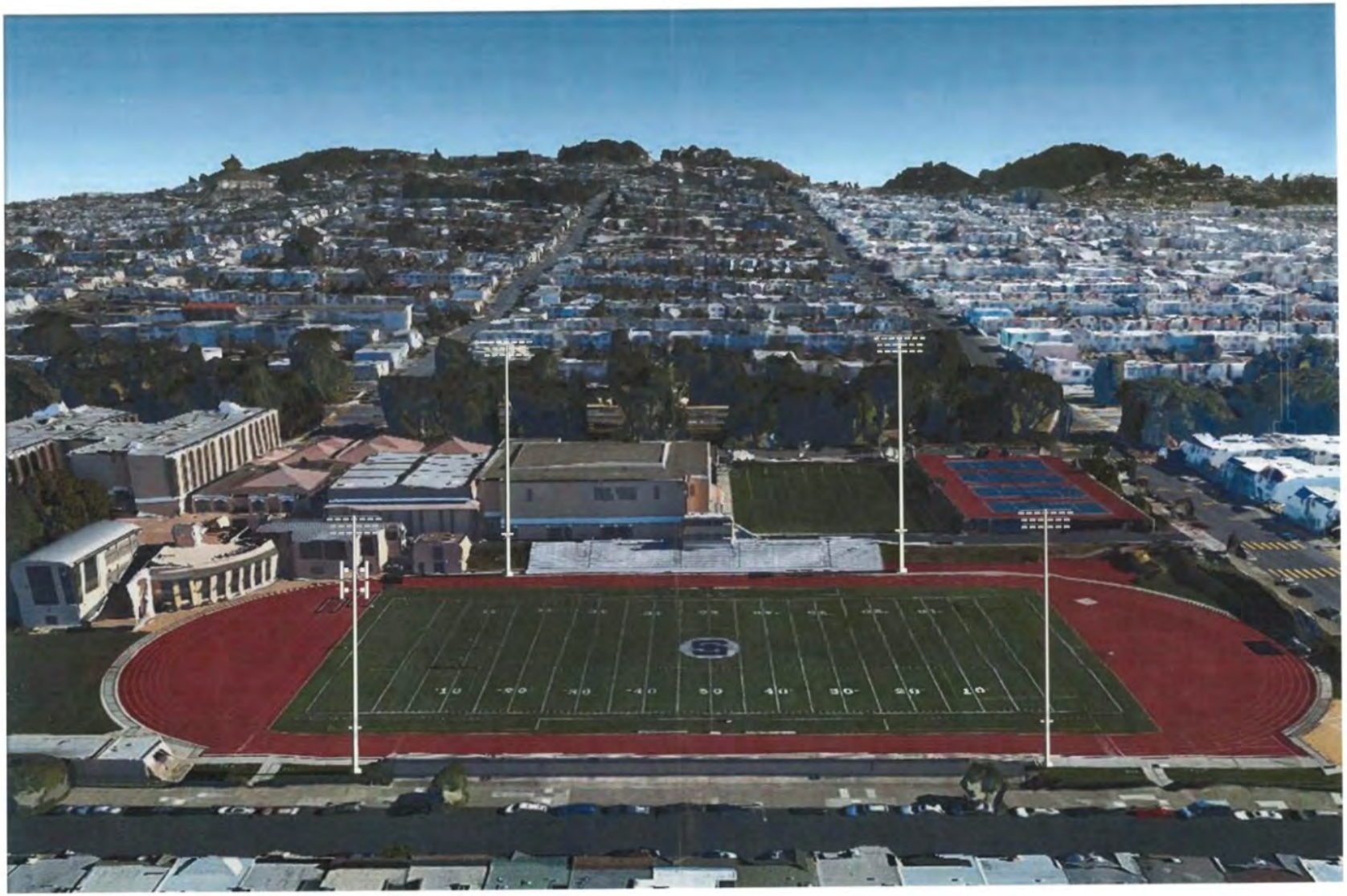
The proposal should be re-filed as a variance application under Code Section 305 rather than as a CUA application. We believe that the project proponent has attempted to circumvent the stricter variance requirements by applying for a CUA rather than a variance. We also believe that a variance should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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

informal meeting with SINA, Mr. Murphy stated the new lights are intended as *"a marketing tool"* to attract top student athletes since the school must compete for top talent[5].

> **Comment 5.A:** The project does not meet the applicable criteria of 303(c)(1). The stadium lighting will only benefit students and the school, which has operated successfully for many years without permanent field lighting. The football field is not available for public use and the proposal will not change that, so the proposed use will not serve the surrounding neighborhoods at all. Instead, it will have significant overflow impacts on the neighborhoods and will degrade the quality of life in them. We believe that very few students live in the Outer Sunset neighborhoods since most students arrive by car or public transit (see also Comment 3.A above).
>
> The project is not necessary or desirable for the immediate neighborhoods especially given the height of the poles and the added intensity of use over many new night time games and practices during weekdays that would result (see additional discussion in Fact and Comment 5.H). The height of the poles is also not compatible with the neighborhood, nor are the poles in keeping with the height or scale of existing development within the surrounding residential neighborhoods (see Fact and Comment 5.E below).

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

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

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

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

[5] SINA contemporaneous meeting notes, March 12, 2020.

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

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

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

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

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

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

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

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

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

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

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

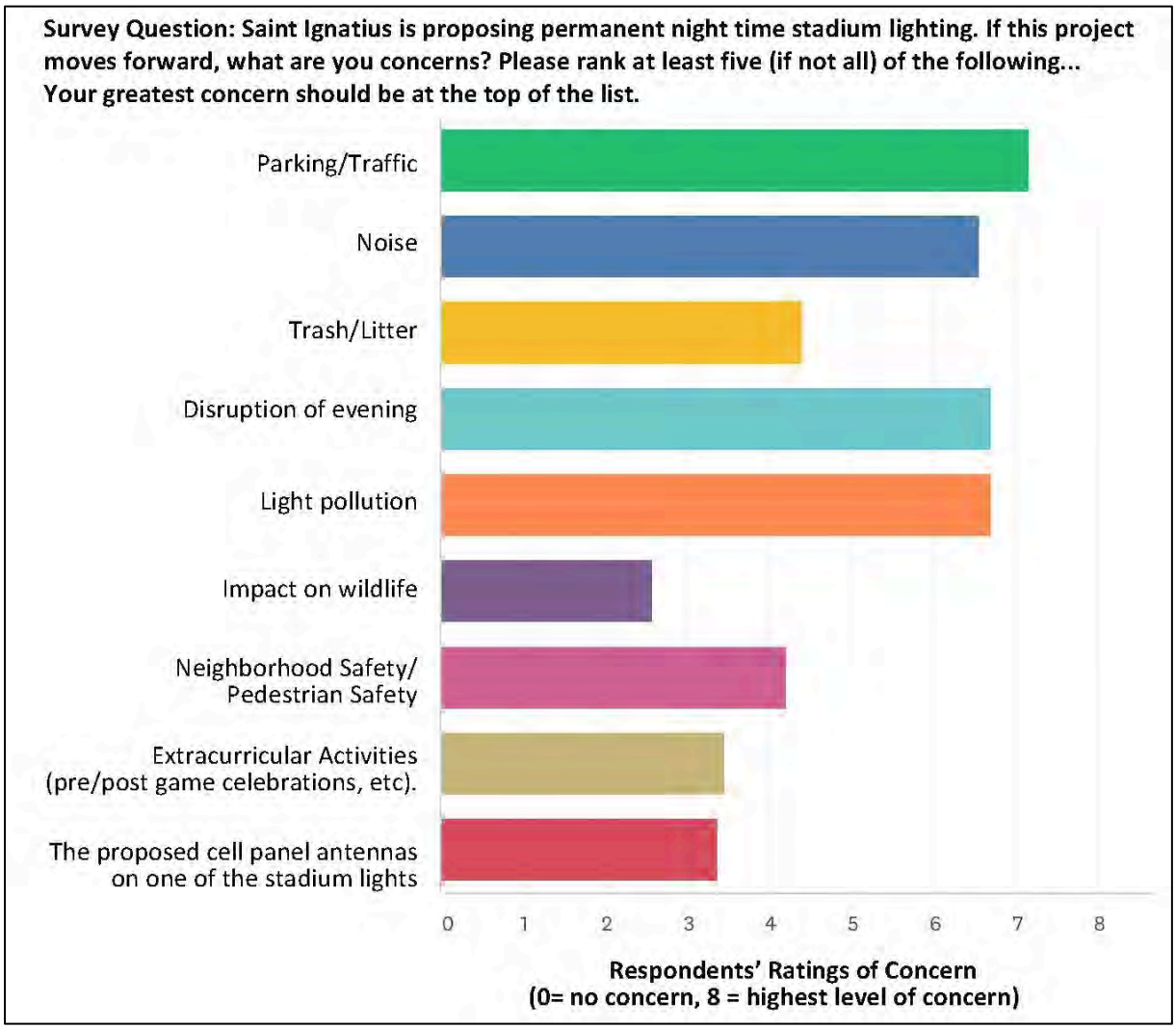
In addition, there are currently no permanent lights on the athletic field, so any new lighting will add significant light pollution load onto the immediate neighborhood and night sky, where there was previously none (see also Facts and Comments 5.E and 5.F, and Topic 6).

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

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

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

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




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

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

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

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

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

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

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[7] Measured estimates from Google Earth.

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

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

[10] https://romesentinel.com/stories/lighting-issues-at-sheveron-stadium,76585

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

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

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

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

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

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

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

are located within 300 feet of a possible urban bird refuge[12] (see 2015-014427PRV) so great care should be taken to ensure that any school lighting does not adversely impact birds.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The 2015 project description document states that Friday night football games would end by 10:00 pm and evening practices and other sporting competitions would end by 8:00 or 8:30 pm. The school provided a table in 2018 of anticipated field use (Figure 3) that shows 66 nights of games with lights on until 10:00 pm, including 12 night time football games that currently occur on Saturday during the day, and 68 other games with lights on until 9;00 pm. At the time, Saint Ignatius also planned to continue renting out their field for 75 additional nights until 10:00 pm although more recently they stated it would not be rented for night use. These games and events are apparently in addition to 150 practice evenings that would have lights on until 8:30 pm (see note ** in Figure 3). Unless temporary lights are used (see Fact and Comment 5.I below) all games have ended at dusk. It can be assumed that all practices currently end at dusk too. This projected usage constitutes potentially a full year of disturbed nights in our neighborhood over potentially seven days of the week as listed in Figure 3.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[18] https://www.usgbc.org/sites/default/files/LEED%20v4%20BDC_07.25.19_current.pdf

**List of Appendices**

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

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

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

**Appendix 4:** 2015 neighborhood meeting materials

**Appendix 4.a:** June 2015 SINA letter to Saint Ignatius
**Appendix 4.b:** September 2015 neighborhood meeting handouts
**Appendix 4.c:** October 2015 Saint Ignatius responses to neighbor questions

# APPENDIX 1

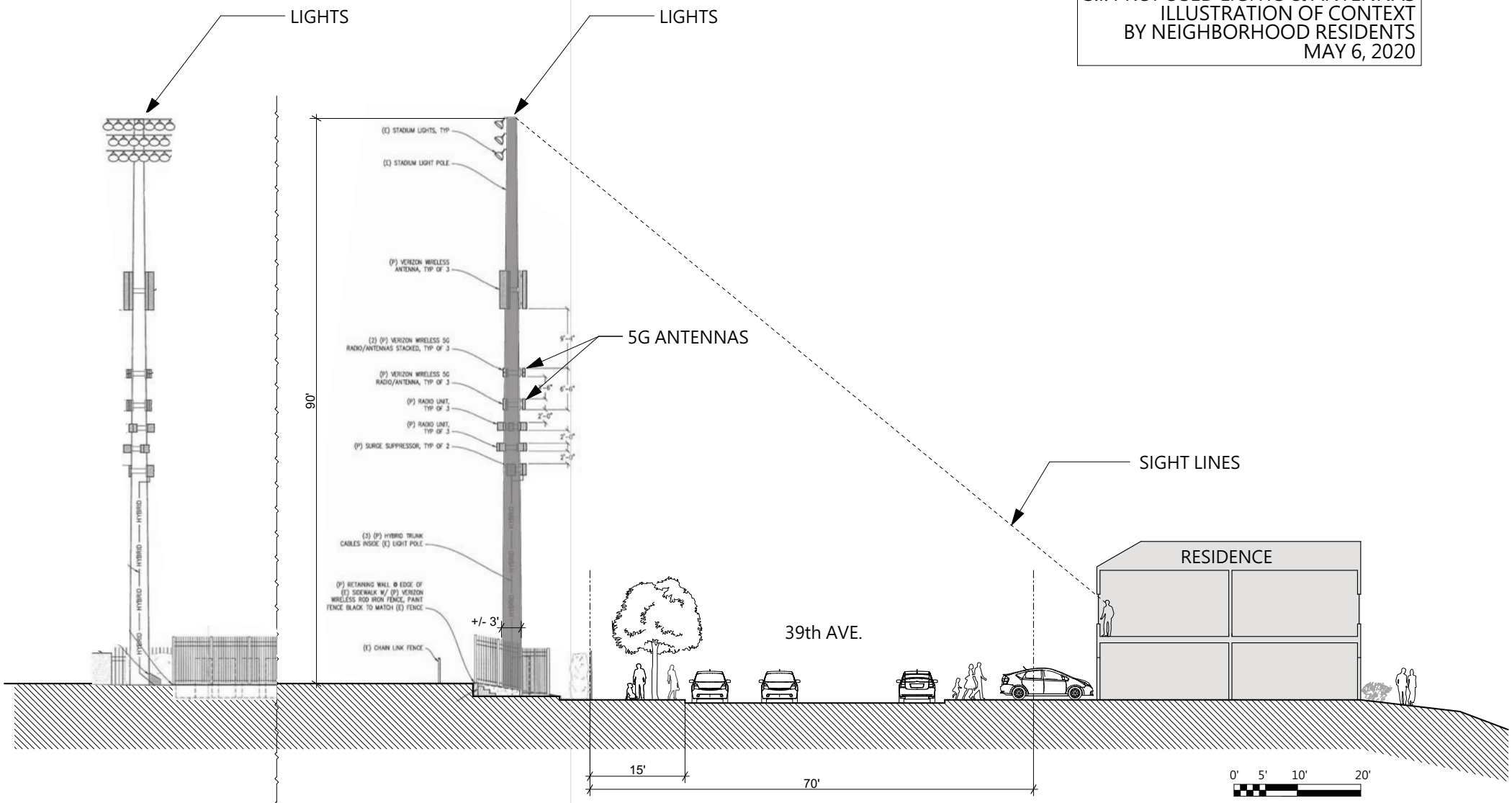
## PHOTOGRAPHIC RENDITIONS AND SCALE DRAWINGS SHOWING RELATIONSHIP OF 90-FOOT POLE HEIGHT TO SURROUNDING BUILDINGS AND LANDSCAPE

Photo Rendition 1
TOP OF LIGHT 90 FT. APPROX 4.5X HEIGHT OF RESIDENCES.
TOP OF LIGHT 90 FEET. OVER 2X HEIGHT OF ADJ. SCHOOL BUILDING.
TOP OF BUILDING APPROX 40 FEET
TREES APPROX 40-50 FEFT
SINGLE FAMILY RESIDENTIAL NEIGHBORHOOD, APPROX 20 FEET
39th Ave
Google Earth
Image Landsat / Copernicus
© 2020 Google
100 ft
N

Photo Rendition 2
TREES APPROX 40-50 FEET
TOP OF BUILDING APPROX 40 FEET
TOP OF LIGHT 90 FEET. OVER 2X HEIGHT OF ADJ. SCHOOL BUILDING.
TOP OF LIGHT 90 FT. APPROX 4.5X HEIGHT OF RESIDENCES.
SINGLE FAMILY RESIDENTIAL NEIGHBORHOOD, APPROX 20 FEET
WIDTH OF FOOTBALL FIELD 160'
Google Earth
Image Landsat / Copernicus
© 2020 Google
Data SIO, NOAA, U.S. Navy, NGA, GEBCO
Data MBARI
N
100 ft

Photo Rendition 3
TOP OF LIGHT APPROX 90 FT. APPROX 4.5X HEIGHT OF RESIDENCES.
SINGLE FAMILY RESIDENTIAL NEIGHBORHOOD, APPROX 20 FEET
TOP OF LIGHT 90 FEET. OVER 2X HEIGHT OF ADJ. SCHOOL BUILDING.
TOP OF BUILDING APPROX 40 FEET
TREES APPROX 40-50 FEET
Google Earth
Data LDEO-Columbia, NSF, NOAA
©2020 Google
Data SIO, NOAA, U.S. Navy, NGA, GEBCO
Data CSUMB SFML, CA OPC
90 ft

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

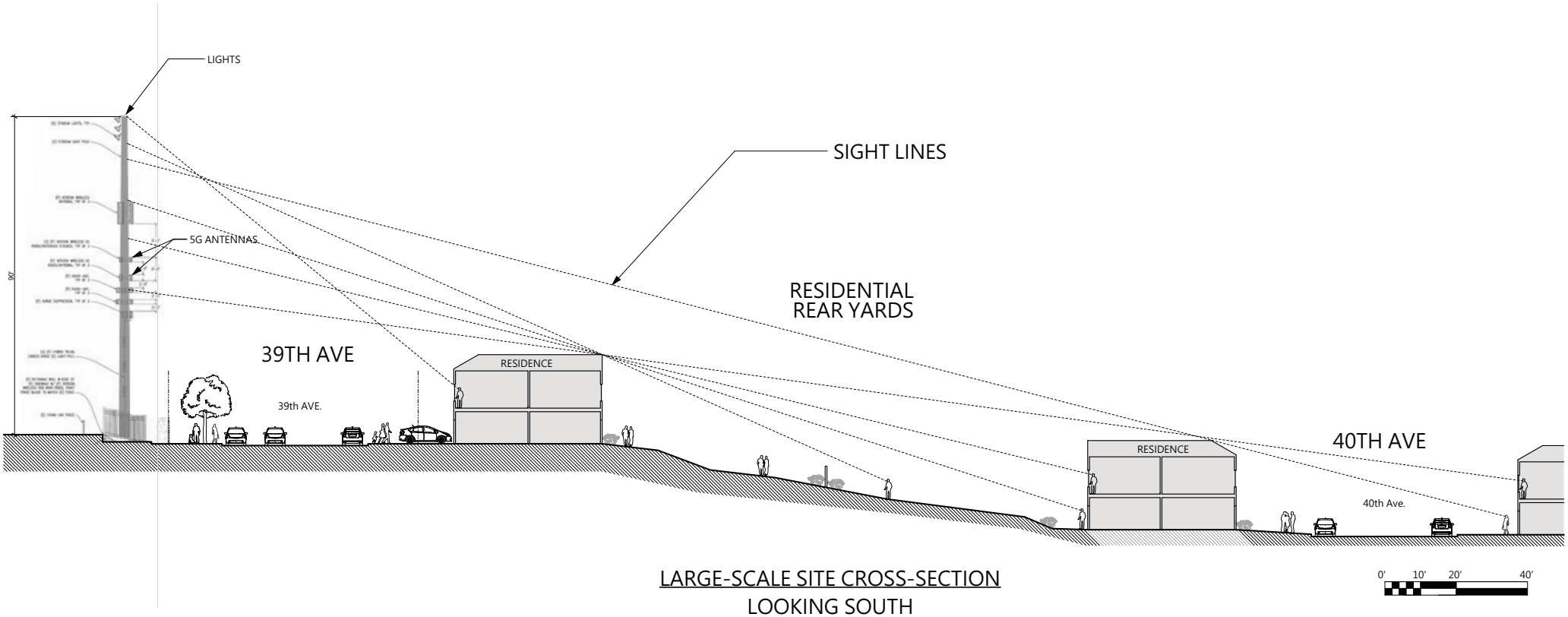



POLE EAST ELEVATION
PER SHEET A-5

SITE CROSS-SECTION AT POLE
PER SHEET A-3
LOOKING SOUTH

# 39TH AVENUE VIEW

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




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

## 39TH & 40TH AVENUE VIEW

# APPENDIX 2

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

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

**Location:** Accessor Block: 2094, Lot No. 006
**Address:** 2001 37th Avenue
**Property Name:** Saint Ignatius College Preparatory

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

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

**Please refer questions and send documents to:**
Deborah Fischer-Brown, Secretary Saint Ignatius Neighborhood Association
415-566-6075
sisunsetneighbors@hotmail.com

**If US mail must be used, please deliver documents to:**
Deborah Fischer-Brown
2151 39th Ave
San Francisco, CA 94116

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

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FYI No Action

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

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

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

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

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

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

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

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

Location: Accessor Block: 2094, Lot No. 006 Address: 2001 37th Avenue.

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

Email: sisunsetneighbors@hotmail.com

If US mail must be used, please deliver documents to:
Deborah Fischer-Brown
Secretary, Saint Ignatius Neighborhood Association
2151 39th Ave
San Francisco, CA 94116

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

Thank you for your prompt attention to this request.

Deborah Fischer-Brown
Secretary, Saint Ignatius Neighborhood Association
415-566-6075
sisunsetneighbors@hotmail.com

# APPENDIX 3

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

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

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

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

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

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

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

Saint Ignatius Questions:

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

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

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

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

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

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

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

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

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

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

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

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

14) In your response to comments at the 2016 neighborhood meeting, you said you would involve an acoustical engineer if 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

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

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

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

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

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

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

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

Thank you
Saint Ignatius Neighborhood

# APPENDIX 4.a

## 2015 NEIGHBORHOOD MEETING MATERIALS

## JUNE 2015 SINA LETTER TO SAINT IGNATIUS

June 29, 2015

Open Letter to SI from your neighbors.

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

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

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

This will reiterate our concerns:

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

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

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

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

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

# APPENDIX 4.b

# 2015 NEIGHBORHOOD MEETING MATERIALS

# SEPTEMBER 2015 NEIGHBORHOOD MEETING HANDOUTS

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

Dear Neighbor,

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

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

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

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

Here's the agenda for the night:

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

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

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

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

Thanks, and we look forward to seeing you.

Rev. Edwin B. Harris, S.J.

Edwin B. Harris SJ

President, St. Ignatius College Preparatory

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

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

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

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

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

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

1. Current state laws do not allow students to carpool until they are 18 years old.
2. SI encourages carpooling and public transportation. We contract with CYO to provide bus transportation from Marin and San Mateo counties for 140 students, and many of our families choose to carpool or ride BART and/or MUNI. Some even use Uber.
3. At this point, we don't plan to build more parking structures, though we do hope to create more parking on 37th avenue between Pacheco and Rivera Streets by making this section one-way and having cars park on a diagonal. This would add 60 additional space (approximately) to the area in front of our school. We have begun discussions with the city to expedite these changes.
4. For evening events or for high capacity events, we can (if available) rent parking at A.P. Giannini School. (We have secured parking there already for the Nov. 7 & 8 fashion shows.)
5. We will continue to encourage the carpooling by using the 511 car-sharing option.
6. We have many students who use car ride services, such as Uber, Lyft and Shuddle.
7. We invite our neighbors to help us think of other solutions. We're curious about the possibility of having street cleaning happen from 3-5 p.m. around the area rather than 9-11 and 1-3 to create more space on the Sunset Blvd. side of 36th Avenue where there is no option to block driveways. We would not pursue this without neighborhood support, and we welcome your ideas to help lessen this problem.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**History**

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

**Rationale**

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

**Advantages to Neighbors**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1. Our hope is that Friday night games will alleviate parking and congestion issues on Saturdays. On many Saturdays, we have events at J.B. Murphy Field while soccer and other teams gather at West Sunset. Having more playing time available will, we hope, reduce congestion on Saturdays in the neighborhood.
2. While many neighbors are concerned about the lights, some may want to attend a Friday night football game, an opportunity we are making available to you at no cost.

**Q. Just how dangerous are cell towers?**

From www.cancer.org (the American Cancer Society)

1. Some people have expressed concern that living, working, or going to school near a cell phone tower might increase the risk of cancer or other health problems. At this time, there is very little evidence to support this idea. In theory, there are some important points that would argue against cellular phone towers being able to cause cancer.
2. First, the energy level of radiofrequency (RF) waves is relatively low, especially when compared with the types of radiation that are known to increase cancer risk, such as gamma rays, x-rays, and ultraviolet (UV) light. The energy of RF waves given off by cell phone towers is not enough to break chemical bonds in DNA molecules, which is how these stronger forms of radiation may lead to cancer.
3. A second issue has to do with wavelength. RF waves have long wavelengths, which can only be concentrated to about an inch or two in size. This makes it unlikely that the energy from RF waves could be concentrated enough to affect individual cells in the body.
4. Third, even if RF waves were somehow able to affect cells in the body at higher doses, the level of RF waves present at ground level is very low – well below the recommended limits. Levels of energy from RF waves near cell phone towers are not significantly different from the background levels of RF radiation in urban areas from other sources, such as radio and television broadcast stations.
5. For these reasons, most scientists agree that cell phone antennas or towers are unlikely to cause cancer.

**Q. Will the lights affect the resident bird population or migrating birds?**

1. We have been in contact with the Audubon society and asked for their input on this matter. We have also spoken with SF Rec & Park about this and they have no documented bird deaths with their lighting systems.

**Q. Will light reflect on the Field Turf back into the night sky?**

1. We don't expect this to be a problem as LED lights do not have the reflective and glare issues of older technology lights. Imagine light shining on a piece of plastic from 90 feet above. Then imagine that light bouncing up at the brightly lit area directly above the field (five feet up). We doubt any additive effect will occur anywhere close to the height of the stadium. We have contacted the lighting engineer who did this study for Beach Chalet and asked for his input on the project.

**Q. Why don't you put lights on your Pacifica Fields and use them for football games?**

1. Fairmont Field in Pacifica is located directly over the San Andreas fault. We lease the field and are not allowed to build any structures there. In addition, there is no running water or permanent bathroom at the facility.

# APPENDIX 4.c

# 2015 NEIGHBORHOOD MEETING MATERIALS

# OCTOBER 2015 SAINT IGNATIUS RESPONSES TO NEIGHBOR QUESTIONS

Here are the objections raised by neighbors and our responses to them:

1. **The lights will be visible from nearby homes at night, disturbing neighbors and keeping children from sleeping.**
    a. These are state-of-the-art LED lights that light the field efficiently with hardly any illumination beyond the stadium. Take a look at the chart to see just how little light will spill over onto 39th avenue.
    b. The lights will be focused down at the field, not out at the neighborhood
    c. LED lights have less impact on birds and other wildlife than older generation lights.
    d. We have engaged a lighting engineer recommended by the City of San Francisco to perform a light study, the same engineer who did the work at the Beach Chalet soccer fields. We will share the lighting study with all interested parties.

2. **Lights on the field means the school day, with all its noise, parking, congestion and litter, will be extended, disrupting the lives of the neighbors when they return from work.**
    a. SI is working to lessen the burden of parking on the neighbors on two fronts. First, we have asked Rec & Park to open the parking lot on West Sunset to our students when the construction to the site is completed. We are asking for the neighborhood's help with getting this accomplished. Secondly, we are applying to change parking on the north side of Rivera between 37th and 39th Avenues from parallel to diagonal parking. We hope both efforts will reduce the incidence of students or parents double-parking or parking in driveways.
    b. We continue to work with students to be good neighbors, especially concerning litter and noise. We have instituted a reporting mechanism available through our website, and our director of security is part of several neighborhood organizations to work to mitigate these issues.
    c. SI encourages carpooling and public transportation. We contract with CYO to provide bus transportation from Marin and San Mateo counties for 140 students, and many of our families choose to carpool or ride BART and/or MUNI. Some even use Uber.
    d. We have just instituted a van pick-up from BART to SI in order to further alleviate issues surrounding traffic & parking.
    e. We plan to add existing parking when we build major structures on campus.
    f. Approximately 35 events each year – both games and practices combined – will involve lights. Five of these events will be football games. These five are the only games that draw crowds larger than 100 spectators. The others simply don't attract viewers other than parents of students. We are looking into the viability of closing off 39th avenue during the five night games that attract larger crowds.
    g. For all games, lights will be off by the athletics office by 10 p.m. at the latest and most likely earlier,
    h. For all practices, lights will be off by the athletics office by 8 p.m. at the latest and most likely earlier .
    i. Ultimately, we believe that adding lights to our field will benefit neighbors in two ways. First, rather than drawing two sets of commuters to the area for games at SI & West Sunset, we will spread this out over two days, lessening the impact on neighbors. (For example, rather than 600 cars coming to the neighborhood on Saturday, for example, 200+ will come Friday night for a football game at SI five times per year and 400 cars will come Saturday for Rec & Park games and practice at West Sunset. Due to the sharp cutoff of light, our lighting engineer has recommended that lights be added to shine on 39th avenue to improve safety immediately after extended games.
    j. The second advantage to lights is in case of emergencies. If our field were needed for a staging area after an earthquake, we would have lighting in place to assist emergency personnel.

3. **Lights on the field means that SI will rent the field out to groups who will also bring traffic, noise & light pollution to the neighborhood after regular school hours.**
    a. We have significantly cut back rentals. We will not rent our facility for night use.

4. **The height of the towers will obstruct views and be unsightly.**
    a. 90 feet is the optimal height to adequately light the field while providing almost no spillover of light onto surrounding houses. Please look at the light spillover schematic at the lighting table. The light poles can be shorter but this will likely lead to greater light spillover. Note that the lights at South Sunset and Beach Chalet are 70 feet tall.
    b. Only one light pole needs to have cellular equipment mounted to it; however, at a future date, we may add cellular equipment to a second pole.
    c. The antennas atop our light poles are less obtrusive than the antennas mounted on existing telephone poles.

5. **Some people have expressed concern that living, working, or going to school near a cell phone tower might increase the risk of cancer or other health problems.**
    a. At this time, there is very little evidence to support this idea. In theory, there are some important points that would argue against cellular phone towers being able to cause cancer.
    b. First, the energy level of radiofrequency (RF) waves is relatively low, especially when compared with the types of radiation that are known to increase cancer risk, such as gamma rays, x-rays, and ultraviolet (UV) light. The energy of RF waves given off by cell phone towers is not enough to break chemical bonds in DNA molecules, which is how these stronger forms of radiation may lead to cancer.
    c. A second issue has to do with wavelength. RF waves have long wavelengths, which can only be concentrated to about an inch or two in size. This makes it unlikely that the energy from RF waves could be concentrated enough to affect individual cells in the body.
    d. Third, even if RF waves were somehow able to affect cells in the body at higher doses, the level of RF waves present at ground level is very low – well below the recommended limits. Levels of energy from RF waves near cell phone towers are not significantly different from the background levels of RF radiation in urban areas from other sources, such as radio and television broadcast stations.
    e. For these reasons, most scientists agree that cell phone antennas or towers are unlikely to cause cancer.
    f. See item 4.c. as the use of antennas on the light poles reduces the need for antennas at telephone pole level.

6. **Some neighbors wonder why the school needs the lights at all, given the long history of the school functioning without the lights.**
    a. Students can use JB Murphy Field only on daylight hours; this impacts the rest of their day and defines just when they can practice and play, especially in the winter months when the sun sets earlier than the rest of the year. The same is not true anywhere else on campus (with the exception of the tennis courts). Students can practice and perform dance, drama, orchestra and choir well into the evening, freeing up their time after school for collaborative work on class projects and other co-curricular activities. The primary mission of the school is the education of our students and lights will permit us to have fewer early dismissals in which students miss class time.
    b. It is important, too, to keep as many of the students at the main campus as possible. This is true for theatre, music and sports. While we have alternative fields, the goal is to utilize this campus as a headquarters, with academics followed by afterschool co-curriculars, including athletics and performing arts. Having students on campus aligns with our priorities.

June 9, 2020

Via Email To: Planning Commission Affairs Commissions.Secretary@sfgov.org
Mr. Jeff Horn, Senior Planner, Current Planning jeffrey.horn@sfgov.org

cc: Planning Commissioners:
Mr. Joel Koppel, President 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
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/1Z1eyXDgRwAplPKLKnXlEVh-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]*" [1]. 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)[2] which required the Novato School District to prepare a revised draft EIR that includes an appropriate baseline, evaluates aesthetics, analyzes the

[1] https://caselaw.findlaw.com/ca-court-of-appeal/1629130.html
[2] Publicly available at http://lawzilla.com/blog/coalition-to-save-san-marin-v-novato-unified-school-district/

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.[3] 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.[4]

d) Clayton Valley High School prepared an EIR and later a supplemental EIR for their stadium lighting project.[5] 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[6] 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[7] 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; <u>therefore, the only benefit is to the school</u>.
2. The combined effects of the project on light and glare, noise, and traffic congestion would <u>adversely affect the character of the surrounding community</u>.

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[3] https://caselaw.findlaw.com/ca-court-of-appeal/1629130.html
[4] https://www.mpusd.net/apps/pages/index.jsp?uREC_ID=1424772&type=d&pREC_ID=1788897
[5] https://yvhslightingproject.files.wordpress.com/2012/06/environmental-impact-report-clayton-valley-hs1.pdf
[6] https://yvhslightingproject.files.wordpress.com/2012/06/northgate-high-school-final-eir.pdf
[7] https://www.lgsuhsd.org/UserFiles/Servers/Server_87205/File/District%20Information/General%20Obligation%20Bond,%202014/073.pdf

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:

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.[8] 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).

[8] https://www.siprep.org/uploaded/Neighbor_Postcard_one_side.pdf

**Figure 1a: Proposed Athletic Field Use**

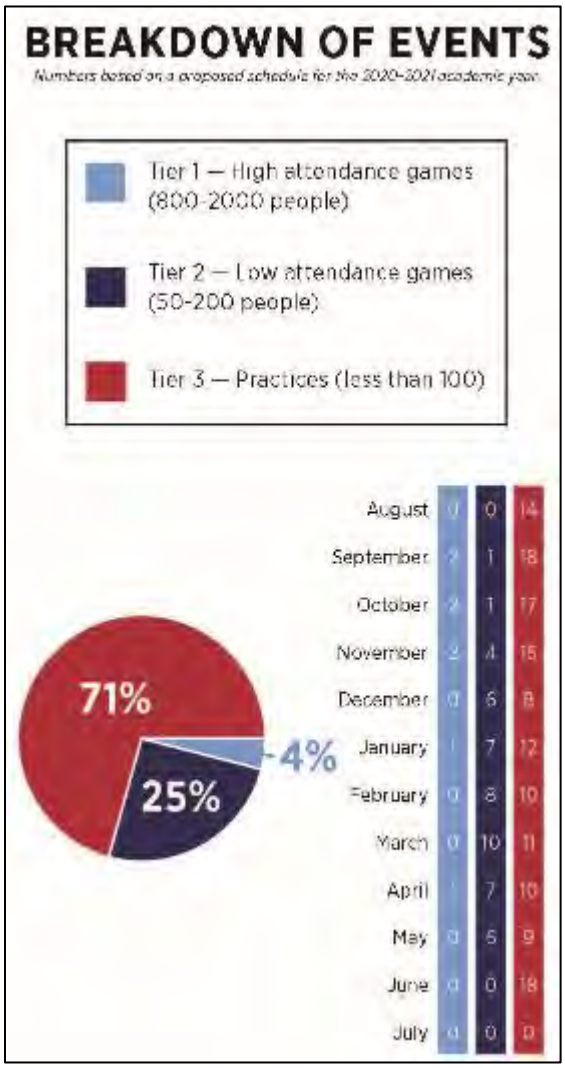


**Figure 1.b: SINA Calculations of Use**

SINA has calculated that the schedule totals 200 games and practices per year, with monthly totals as follows:

| Month | Total Evenings | % of Total Days in Month |
|---|---|---|
| Aug | 14 | 45% |
| Sep | 21 | 70% |
| Oct | 20 | 65% |
| Nov | 21 | 70% |
| Dec | 14 | 45% |
| Jan | 20 | 65% |
| Feb | 18 | 64% |
| Mar | 21 | 68% |
| Apr | 18 | 60% |
| May | 15 | 50% |
| Jun | 18 | 60% |
| Jul | 0 | 0% |

Via a public records request, SINA obtained a 1990 traffic study[9] 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

[9] Jon Twichell/Associates. Traffic Study for Proposed Alterations to S. Ignatius College Preparatory School, May 25, 1990.

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[10], 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 39th 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 37th, 38th and 40th Avenues. Note that Figure 3 shows only a single open parking space on 39th 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.

[10] https://www.siprep.org/uploaded/NIGHT_EVENT_MGMNT_PLAN_2020.pdf

**Figure 2: Verizon Photo Rendition View 1.**

verizon

Sunset & Noriega Site # 255926

Looking Southeast from 39th Ave.

2001 37th Ave.
San Francisco, CA

2/6/20

View #1

Insight photosim (707) 315-1585

**Figure 3: Verizon Photo Rendition View 2.**

verizon

Sunset & Noriega Site # 255926

Looking Northeast from 39th Ave.

2001 37th Ave.
San Francisco, CA

View #2

2/6/20

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:

- 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.
- 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.[11]

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 39th Avenue and Rivera Street, in the middle of the street on 39th Avenue, and at some homes on 39th Avenue.

More important, however, are estimates of candela[12]. 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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[11] http://library.amlegal.com/nxt/gateway.dll/California/police/policecode?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$sync=1

[12] Candela is a measure of the intensity of a light source in a particular direction.

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 39th 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.[13] Readings above 1,500 candela also exceed Musco's own "*minimal to no glare*" category and occur at 22 of 24 homes on 39th 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."[14] 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."[15]

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[16]. Reflected glare should be considered in predictions of overall glare levels[17] 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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[13] (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/WP528003EN-Ephesus-University-of-Phoenix-Glare-Analysis.pdf
[14] https://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=1038&context=archengdiss
[15] https://www.darksky.org/the-promise-and-challenges-of-led-lighting-a-practical-guide/
[16] IESNA Recommended Practice for Sports and Recreation Lighting (RP-6-1)
[17] International Commission on Illumination "Technical Report: Guide on the Effects of Obtrusive Light From Outdoor Lighting Installations" (2003)

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).

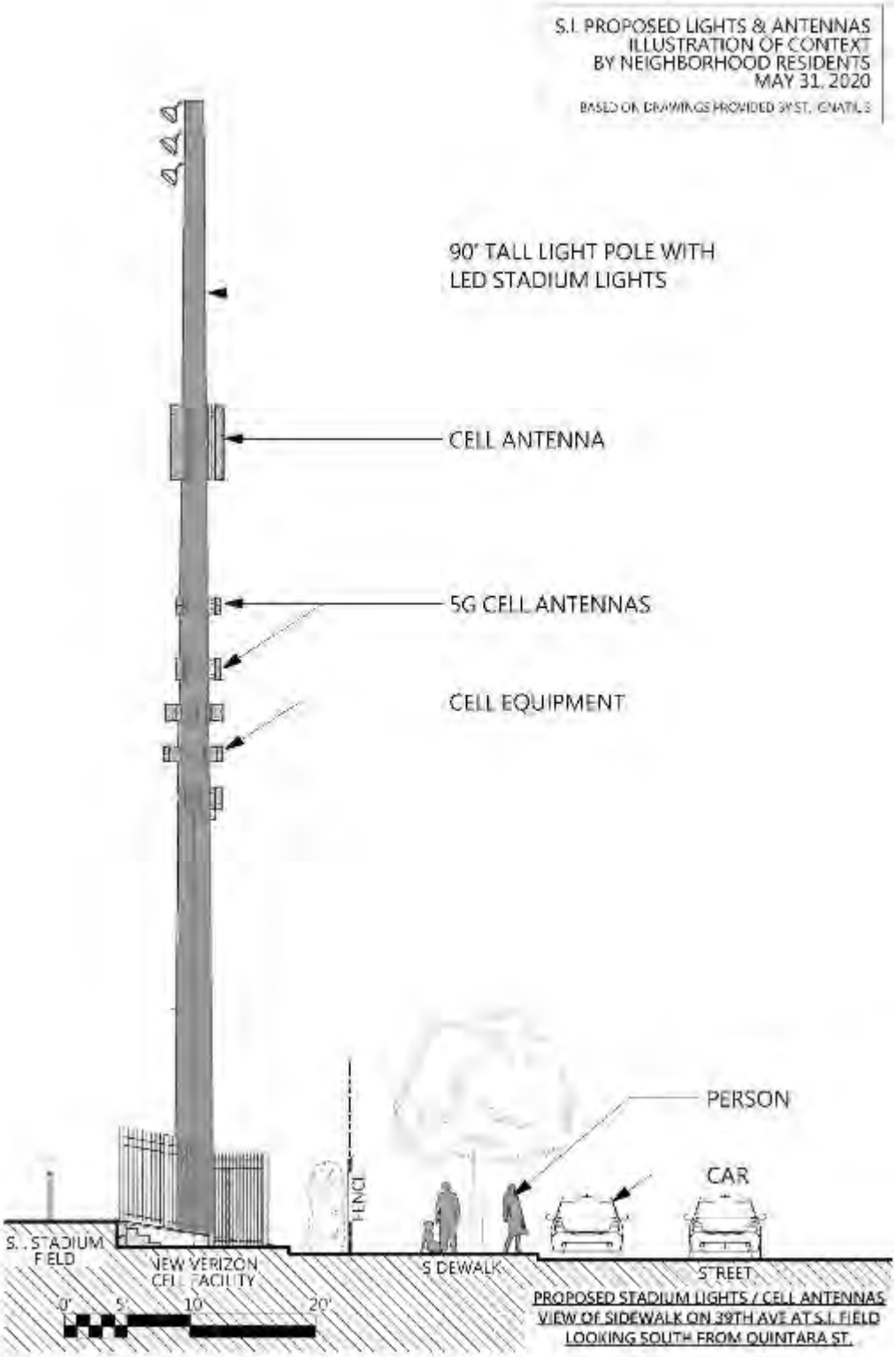
d) **Aesthetics:** The CEQA determination is incomplete since it does not include an evaluation of aesthetic impacts. The current CEQA determination still maintains that no further environmental review is required, the project is categorically exempt, and "*There are no unusual circumstances that would 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.

**Figure 4: Scale Drawing of Stadium Lighting Poles**



## 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[18] 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

[18] https://commissions.sfplanning.org/cpcpackets/2018-012648CUA.pdf

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.[19] 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 <u>will not approve</u> 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 <u>on buildings that already have wireless installations,</u> 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 39th 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 <u>within 11 feet of the sidewalk</u> on 39th Avenue, and within less than 100 feet of the homes on 39th 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

[19] https://archives.sfplanning.org/documents/8709-Wireless%20Telecommunications%20Services%20WTS.pdf

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,

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

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.

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.[20] 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 29th 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 30th 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

[20] https://www.sfgate.com/sf-locals/article/biggest-high-schools-enrollment-san-francisco-15038809.php

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).

<u>SINA Question /Concern #14:</u> 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.

<u>SINA Question /Concern #15:</u> 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

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 40th 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."*

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 39th 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 <u>not</u> 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 irrevokably disrupted, significantly affecting the livability of the neighborhood in adverse ways.

## 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

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# APPENDIX 1

## COALITION TO SAVE SAN MARIN V. NOVATO UNIFIED SCHOOL DISTRICT APPEALS COURT DECISION, APRIL 23, 2020

Court of Appeal, First Appellate District
Charles D. Johnson, Clerk/Executive Officer
Electronically FILED on 4/23/2020 by G. King, Deputy Clerk

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,<br>Plaintiff and Respondent,<br>v.<br>NOVATO UNIFIED SCHOOL DISTRICT,<br>Defendant and Appellant. | A156877<br><br>(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)[1] for a project known as the San Marin

[1] "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,[2] § 21168). We affirm.

## FACTUAL AND PROCEDURAL BACKGROUND[3]

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.

[2] 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*).)

[3] 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[4]

### 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)[5], glare intensity[6], and sky glow[7].

#### 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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[4] The description is taken, in part, from quoted portions of the trial court's decision, omitting citations to the administrative record.

[5] "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.' "

[6] "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 adopted.' Glare intensity ranges from the wors[t] case – 'disability glare' where visibility is lost, to 'discomfort glare' where the light is distracting and uncomfortable."

[7] "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 'sparely-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 with 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.

Petrou, J.

WE CONCUR:

Siggins, P.J.

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

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

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 staduim 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?

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25. Name: Susan Lin on 2020-05-28 02:35:23
Comments:

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26. Name: Randall Hung on 2020-05-28 02:38:33
Comments:

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27. Name: Alan OBrien on 2020-05-28 02:41:06
Comments:

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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.

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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!

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30. Name: Adelle-Akiko Kearns on 2020-05-28 03:50:27
Comments:

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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 crouds 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.

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!

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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.

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73. Name: Lori Ziemba on 2020-06-02 19:12:52
Comments: NO 5G, NO lights!

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74. Name: Donald Ciccone on 2020-06-02 19:32:42
Comments:

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75. Name: Tina zhu on 2020-06-02 20:14:43
Comments:

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76. Name: Tracy Ashton on 2020-06-02 21:19:07
Comments:

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77. Name: Kelsey Koch on 2020-06-02 22:19:17
Comments:

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78. Name: Susan rivadeneyra on 2020-06-02 23:05:05
Comments:

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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.

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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.

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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 I intrusive to the neighborhood. Also, neighbors should be allowed use of the field. Parking on the surrounding streets will be impacted I to evening hours,as well.

No thank you

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 woulds 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

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:

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103. Name: Philip Hung on 2020-06-03 18:13:29
Comments:

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104. Name: Damian A Nunez on 2020-06-03 19:08:38
Comments: No Lights Please!!! Share....

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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.

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106. Name: Natalie Tam on 2020-06-03 19:42:32
Comments: We should respect the neighbors

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107. Name: Duncan Lee on 2020-06-03 19:45:24
Comments:

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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 quailty of life. Please deny the permit or, at a minium, order SI to publish a sufficiently detailed plan so we can ensure mitigation of the detrimental impact on our quiet residential neighborhood.

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109. Name: Jerry Woo on 2020-06-03 20:37:35
Comments: No stadium lights in residential area.

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110. Name: Harry on 2020-06-03 20:42:31
Comments:

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111. Name: Marykathleen stock on 2020-06-03 20:45:13
Comments:

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112. Name: Patrick Schlemmer on 2020-06-03 21:10:44
Comments: I do not want these bright lights in my neighborhood.

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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 theose 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????

---

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:

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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.

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145. Name: Millie Fish on 2020-06-04 16:59:20
Comments:

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146. Name: Nicole on 2020-06-04 17:12:14
Comments:

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147. Name: Benja kew on 2020-06-04 17:44:28
Comments:

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148. Name: Lauraine Edir on 2020-06-04 18:05:32
Comments:

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149. Name: Ellen Scanlan on 2020-06-04 18:16:21
Comments: Light pollution is a global problem.

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150. Name: Dianne Alvarado on 2020-06-04 18:26:22
Comments:

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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?

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152. Name: Albert Ma on 2020-06-04 20:29:10
Comments:

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153. Name: Garlen Chan on 2020-06-04 20:33:59
Comments:

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154. Name: Agnes V on 2020-06-04 20:40:17
Comments:

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155. Name: Vincent T on 2020-06-04 20:40:59
Comments:

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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.

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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!!!

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170. Name: Erin Aulner on 2020-06-05 07:28:09
Comments:

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171. Name: Erin Armstrong on 2020-06-05 07:37:27
Comments:

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172. Name: Rosalie Friedman on 2020-06-05 17:16:43
Comments:

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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.

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174. Name: Jack Allen on 2020-06-05 23:43:16
Comments: No lights at SI please

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175. Name: Michael Ma on 2020-06-06 00:41:47
Comments:

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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.

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177. Name: Michele Gachowski on 2020-06-06 05:47:21
Comments:

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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

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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 noice, more cars, more violence. Our children are able to walk to the park safely ow and that will be imposible with this project.

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181. Name: Michelle Tam on 2020-06-06 21:21:18
Comments:

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182. Name: Elaine Mina on 2020-06-06 23:37:37
Comments:

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183. Name: Yvonne Daubin on 2020-06-06 23:55:35
Comments: I strongly oppose this.

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184. Name: Sadaf Mir on 2020-06-06 23:57:31
Comments:

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185. Name: Andrew Sohn on 2020-06-07 02:01:48
Comments:

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186. Name: Michael Murphy on 2020-06-07 02:44:13
Comments: This project is of no benefit to the community.

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187. Name: Crystal Stermer on 2020-06-07 05:13:15
Comments:

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188. Name: Michael Bourne on 2020-06-07 05:18:16
Comments: No lights! No cell tower!

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189. Name: Kelly Le on 2020-06-07 05:28:02
Comments:

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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 surounding 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**

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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 though 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. femoticell
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 be 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 afflicated

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 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 37th 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 we 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 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
**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
**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 tpically 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
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

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# 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 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.

Photo: Paul Kozakiewicz

**The St. Ignatius School football field and track could be getting permanent night-time lighting for sporting events.**

"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."

| | |
|---|---|
| **From:** | SISunsetNeighbors @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 11:33:38 AM |
| **Attachments:** | Outlook-hhvbttbd.png<br>BOS File #200992 and #200996 - SINA Commission Submittal 1 - 2020_05_06.pdf<br>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

| | |
|---|---|
| **From:** | SISunsetNeighbors @hotmail.com |
| **To:** | BOS Legislation, (BOS); Board of Supervisors, (BOS) |
| **Cc:** | Mar, Gordon (BOS) |
| **Subject:** | Email 3: BOS File #200996 CUA Appeal Supplement – Saint Ignatius Stadium Lighting (Planning #2018-021648CUA) |
| **Date:** | Thursday, September 17, 2020 11:14:44 AM |
| **Attachments:** | Outlook-wz2z3cg4.png<br>BOS File #200996 - CUA Appeal Supplement - CHEE LLC - 2020_09_17.pdf |

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**To: Clerk of the Board of Supervisors**
**Fr: SI Neighborhood Association**

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Attached please a document that supplements the CUA appeal filed under BOS File #200992 for the Saint Ignatius Stadium Lighting Project.

Please kindly confirm receipt.
Thank you

Deborah Brown, Secretary

SI Neighborhood Association

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**The Center for Health, Energy & the Environment, LLC**

PO Box 424 Strafford, NH 03884
Voice: 603.664.5097 Fax: 603.664.5109
CHEE@myfairpoint.net

**September 17, 2020**

Attn: Angela Cavillo, Clerk of the Board of Supervisors
San Francisco City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102
Via email: Board.of.Supevisors@sf.org, bos.legislation@sf.org

**RE: Planning Case Number 2018-012648CUA - Saint Ignatius Stadium Lighting Project**

Honorable Members of the Board of Supervisors:

I am writing on behalf of the Saint Ignatius Neighborhood Association ("SINA") concerning the proposal to install stadium lighting towers and a wireless telecommunications facility at the J.B. Murphy Field Stadium ("stadium" or "field") of Saint Ignatius College Preparatory ("Saint Ignatius" or "school") located at 2001 37th Avenue. Saint Ignatius is a private secondary school located in a residential neighborhood in the Outer Sunset District.

SINA is an association comprised of over 165 neighbors who live in the area surrounding the school. The organization was formally registered as a community/neighborhood organization with the San Francisco Planning Department ("Department") in October 2016.

The Planning Commission granted Conditional Use Authorization ("CUA") for the stadium lighting project ("Project") on July 23, 2020 (Motion No. 20769, Case No. 2018-012648CUA)[1]. Pursuant to San Francisco Administrative Code Section 308.1, SINA submitted a timely CUA appeal on August 21, 2020[2].

This letter supplements the CUA appeal filing with more information in support of the appeal. It expands upon SINA's previous submittals for the Planning Commission hearings (May 6, 2020 and June 9, 2020[3], and July 22, 2020[4]) and includes results of CHEE's review and analysis of the proposed Project in relation to the Planning Code and other relevant City codes.

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[1]BOS File No. 200996 https://sfgov.legistar.com/View.ashx?M=F&ID=8761935&GUID=CC045236-5338-4B44-9F81-4D846A69C42B
[2] https://sfgov.legistar.com/View.ashx?M=F&ID=8761935&GUID=CC045236-5338-4B44-9F81-4D846A69C42B .
[3] Included as Exhibit J in the July 23, 2020 Commission hearing packet. https://commissions.sfplanning.org/cpcpackets/2018-012648CUAc1.pdf
[4] Available at https://docs.google.com/document/d/1tnLYBpZMoCu-rsKzRUBUmcrwfZ_lSXNcAwL3cmhrOgc/edit?usp=sharing

## Qualifications of the Center for Health, Energy & the Environment, LLC

The Center for Health, Energy & the Environment, LLC ("CHEE") is a boutique consulting firm specializing in environmental and regulatory analysis, permitting, and compliance monitoring. Our staff have over 40 years of technical expertise in regulatory interpretation and review at the federal, state and municipal levels; development planning and permitting; and regulatory compliance plans and training. We have provided services across more than 30 states including California for clients such as federal and state agencies, multi-national corporations, regional planning commissions, municipalities and non-profit organizations. A sample of CHEE's project experience relevant to this CUA appeal is summarized in Attachment 1.

## Project Summary

The Project Sponsors (Saint Ignatius and Verizon Wireless) propose to add four 90-foot tall lighting towers to the stadium which borders Rivera Street and 39th Avenue. The area is zoned as residential, single family district with a 40-foot height restriction (RH-1 40X). The lighting towers are intended to allow for 150 nights a year of weekday evening use for athletic practices, games and events lasting until 9 pm, and until 10 pm on 20 Friday or Saturday nights per year. In addition, on the proposed northwest light tower (at 39th Avenue near Quintara Street), the Project Sponsors seek to install and operate a wireless telecommunications service facility, consisting of antennas, remote radio units, and surge suppressors located at a height of 34.75 to 66 feet above ground on the tower, as well as ancillary equipment in a ground-based lease area within a fenced compound adjacent to 39th Avenue near Quintara Street.

At this time there is no lighting at the stadium, which means the Project would constitute a significant expansion of use of the field on virtually every weekday evening in the late fall, winter, and early spring seasons, as well as on some weekends - from the time of sunset between 5 and 6 pm without field lights - to 9 to 10 pm under the proposed Project. The school currently has field lighting at their smaller practice field, authorized under a separate CUA (Case No. 2003.1273C, Motion No. 16770). Practice field lighting is authorized for use only until 7:30 pm.

## Additional information related to the CUA appeal filing

CHEE has conducted a detailed review of the Project's application documents, the Commission's draft and final CUA Motions, SINA's prior submittals (May 6, 2020 and June 9, 2020, July 22, 2020) for the Commission hearing that approved the Project, SINA's CUA appeal filing dated August 21, 2020, and applicable sections of the Planning Code ("Code"), the Police Code, and the General Plan.

We also reviewed the Department's September 15, 2020 memorandum[5] in response to SINA's CUA appeal. We note that the memorandum contains numerous errors including the document date, incorrect date of the Commission hearing, reference to a Medical Cannabis Dispensary (MCD), incorrect Motion number, and incorrect geographic locations of the athletic field and surrounding structures).

[5] https://sfgov.legistar.com/View.ashx?M=F&ID=8788124&GUID=CC64FDB5-09B6-4450-BD9D-6ED57523BBAD

**Summary of CUA Issues**

The Commission Motion and the Department's response memorandum state in several places that the Project is "on balance" in compliance with the Planning Code including Section 101.1(b) – General Plan Consistency, Section 209.1 – Residential RH District, Section 303 – Conditional Uses, and Section 304 – Planned Use Developments. The Motion also states that the Project is consistent with the General Plan's Objectives and Policies, and with the Wireless Telecommunications Services Facilities Siting Guidelines.

The term "on balance" means "after considering all the facts" or "after taking all factors into consideration". The Department has failed to explain exactly how the Project is in compliance with the Code provisions included in the Motion's findings. Rather, the Department continues to assert, without any underlying rationale or evidence to support the assertion, that:

- The Project would maintain and expand educational and recreational uses, "which are uses in support of families and children in San Francisco";
- That the lighting system would have a "nominal impact" of light and glare to the surrounding residential areas;
- That nighttime use of the field "is not expected to adversely impact traffic and parking" in the neighborhood; and
- That the Project is desirable because it "promotes the operation of a neighborhood-serving school".

In order to be approved, it is reasonable to expect the Project to be fully in compliance and consistent with all applicable requirements - not in partial compliance with them, or consistent with only some requirements, while totally inconsistent with other relevant and fundamentally important requirements and policies intended to protect the neighborhood character and ensure that residents are not unduly impacted by this new development.

**Our review finds that the proposed Project does not fully meet the requirements of several applicable sections of the Planning Code, and it is not at all consistent with the Wireless Siting Guidelines. The Project also does not meet the objectives, policies, spirit or intent of applicable portions of the San Francisco General Plan.**

These matters are discussed in detail below, but for one example - the Project is required to have a 25% rear yard setback under Code Section 134. However, the Department dismisses this requirement entirely by simply stating that the Commission "approved a rear yard modification" under Section 304 (Planned Unit Development), despite providing no justification for that approval other than the Planned Unit Development itself (see Section 1.b below).

The Project is also unlikely to meet applicable sections of the Police Code (noise restrictions) and the school may be currently out of compliance with that code.

The school is also not in compliance with, and has repeatedly violated, the conditions of its practice field lighting CUA (No. 2003.1273C) by leaving those lights on well after the 7:30 pm

shut off restriction, according to neighbor testimony. Lastly, the school has repeatedly violated Code Section 205.4(b) for past unauthorized use of temporary lighting on the athletic field.

The Department's appeal response memorandum states that the Police Code and Planning Code Section 205.4(b) are not subject to the CUA findings and were not considered in the CUA approval. We disagree. For example, State law requires that the General Plan address seven issues: land use, circulation, housing, conservation, open space, noise and safety. Noise is regulated under the Police Code rather than the Planning Code, but noise is still clearly applicable to this Project within the context of the General Plan.

The Board of Supervisors and the Commission must consider these additional requirements, as well as the past violations of an existing CUA approval when looking "on balance" to approve a new CUA. A Project Sponsor or a Planned Unit Development that has shown past disregard for important City codes must have new applications scrutinized closely to assure that any new project or development will remain in compliance with new approvals.

Our analysis of the Project's non-compliance with applicable Code and General Plan requirements is provided below. Section 1 deals with the Planning Code, Section 2 with the Wireless Guidelines, Section 3 with the General Plan, and Sections 4 and 5 with other codes and past violations. Many aspects of these issues are also discussed in the following documents related to the Project:

- CUA appeal filing, August 21, 2020
- Expert testimonial letters from CHEE and Kera Lagios in support of the CEQA appeal, filed September 17, 2020
- Neighbor testimony submitted with SINA's appeal letter, filed September 17, 2020
- Over 40 recent letters from neighbors to the Board of Supervisors
- SINA's three prior submittals to the Commission (also filed with the Board, September 17, 2020)

## 1. The Project does not meet numerous Planning Code requirements

The following discussion follows the order of applicable Planning Code Sections. Our comments lay out the purpose of each applicable Code Section precisely to highlight the many ways in which the Commission has not considered these in their "on balance" determination that the Project should be approved.

a. Section 101 states that the purpose of the Planning Code is to "promote and protect the public health, safety, peace, morals, comfort, convenience and general welfare" including the following specific purposes related to this Project (paraphrased):

   101(b): To protect the character of residential areas within the City, and to promote the orderly and beneficial development of such areas

   101(c): To provide adequate privacy and convenience of access to property

Section 101.1(b) discusses priority policies under General Plan and 101.1(b)(2) reiterates that existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.

Installation of stadium lighting for evening and night time athletic games and practices on 150 nights per school year does not in any way meet these requirements despite numerous Commission findings to the contrary (Finding 14A, 14B, the second Finding No. 6, 6A on page 9 of the Motion, Finding 16B, and Finding 17) . The lighting Project would irreparably harm the neighborhood character due to the daily impacts of the lighting and the associated increased noise, which would disturb the peacefulness of the neighborhood. Traffic and parking impacts including residents' blocked driveways would clearly disrupt neighbor convenience and lead to public safety concerns during athletic field use. The aesthetic impact on the neighborhood due to the presence of 90-foot towers in a residential 40-foot height district also does not protect the neighborhood character. See also the CEQA appeal and CEQA expert testimonial letters for more detail on these issues.

b. Section 134(a)(2) states that the purpose of rear yard setbacks is to "maintain a scale of development appropriate to each district, complementary to the location of adjacent buildings" [emphasis added]. Section 134(c)(1) dictates current minimum rear yard setbacks within this RH-1 district to be 30% of the total depth of the rear yard and no less than 15 feet. We understand that since the original Project application was submitted prior to January 15, 2019, the minimum rear yard depth was based on the minimum setback in effect at the time, or 25% [6].

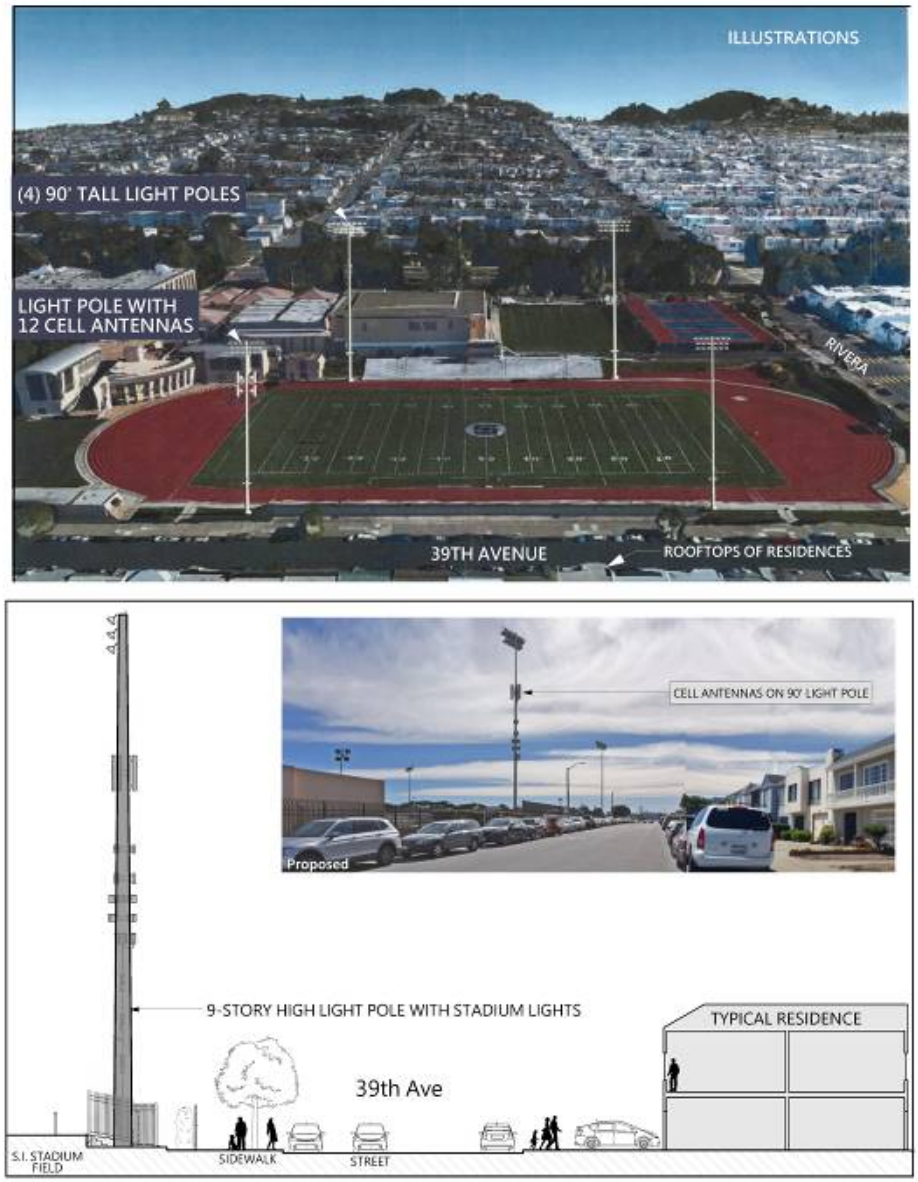
The school's rear yard borders on 39th Avenue with homes directly across the street. According to the Motion (Finding 13B) the Project seeks to "encroach into the rear yard". The minimum 25% setback for the rear yard is 137.5 feet (the Motion's second Finding No. 6, 6A on page 9). Our review of the Project plans finds that the edge of the Verizon ground-based lease area would be located only 6.5 feet from the property line and two of the four 90-foot light towers would be located only about 11.5 feet from the property line, directly across the street from the homes on 39th Avenue and within about 85 feet of them.

The Department justifies this grossly out-of-scale project at the very edge of the rear yard under Code Section 304, Planned Use Development (PUD) (Findings 13A, 13B, and the second Finding No. 6, 6A on page 9 of the Motion). Section 304 allows modifications to certain Code requirements "for projects that produce an environment of stable and desirable character which will benefit the occupants, the neighborhood and the City as a whole".

[6] Section 134 of the Code was amended effective October 14, 2019 under Ordinance 206-19, changing the minimum rear yard setback from 25% to 30%.

Figure 1 below is from SINA's July 22, 2020 Commission hearing submittal[7] and illustrates the Project's scale in relation to the surrounding neighborhood. While the Verizon ground-based lease area might be relatively unobtrusive, it strains credulity that the scale of the lighting towers so close to the property line is in keeping with the intent of the rear yard setback requirements - under a PUD or not. This non-existent rear yard setback cannot reasonably constitute a "modification"; rather the Commission completely disregards the setback requirement in its entirety. We fail to see how such a gross disregard for a basic Code requirement promotes or maintains an appropriate scale of development in this neighborhood.

**Figure 1. Scale of light towers in relation to neighborhood and 39th Avenue homes**




[7] Op. cit. Footnote 4, Appendix 1 therein.

c. Section 138.1(a) purpose is to "establish requirements for the improvement of the public right-of-way associated with development projects, such that the public right-of-way may be safe, accessible, convenient and attractive to pedestrian use and travel by all modes of transportation consistent with the San Francisco General Plan".

   Specifically, Section 138.1(c)(1) requires street tree planting for development projects in accordance with the Public Works Code, Article 16 – Urban Forestry Ordinance for projects that add 500 gross square feet or more (Section 806(d)(1)(E)). This Project will add nearly 500 square feet (about 477 sq. ft for lease area and towers).

   The Department makes an argument (Finding 15) that: "The Project will minimize disruption <u>by expanding the school vertically</u>…" [emphasis added] to support supposed consistency with Policy 11.8 in the housing element of the General Plan (see Section 3 below). **This is an absurd argument;** however, using the Department's own logic would imply that the total new square footage must also include the height of the towers - each 90 feet tall. That amount of additional area would greatly exceed the 500 square foot threshold for street trees.

   The Motion also states that the Project requires no additional street treatment since the lights will be equipped with spill and glare shielding such that light and glare "would be nominal on surrounding residential areas".

   We refer you to the CEQA appeal expert testimonial letter from Kera Lagios, a lighting expert who refutes this baseless contention.

   Street trees could also serve to diffuse <u>a small amount</u> of the Project's lighting and noise effects (see CEQA appeal expert testimonial letter from CHEE). Given the proximity of the Project directly adjacent to 39th Avenue and Rivera Street; the disregard for the rear yard setback requirement; and the fact that the ground disturbance area is nearly 500 square feet, makes it important for street trees to be required. <u>But to be clear, street trees offer no panacea</u> to mitigate the overall impacts of this Project.

d. Code Section 202(c) states: "No use shall be permitted in any R District…which by reason of its nature or manner of operation creates conditions that are hazardous, noxious or offensive through emission of odor, fumes, smoke, cinders, dust, gas, vibration, glare, refuse, water-carried waste, or excessive noise".

   The Department completely ignored this section in the Motion. In fact, the Project will create noxious and offensive conditions including glare from the stadium lighting, refuse from attendees left in the neighborhood/resident yards after games, and excessive noise from the public address system, game whistles, and game crowds (see CEQA appeal, K. Lagios and CHEE CEQA letters). Neighbor testimony confirms that these emissions are noxious and/or offensive (see SINA's September 17, 2020 letter Attachments 2-5).

e. Section 209.1 requires a Conditional Use Authorization for PUDs in residential districts. Section 102 defines "Conditional Use" as one that allows the Commission to consider a

project for approval if it is necessary or desirable in a particular neighborhood [emphasis added] but is not normally allowed within a particular zoning district.

While the wireless installation Project may be desirable because it may enhance wireless service in the neighborhood, Saint Ignatius has not demonstrated that the stadium lighting Project is necessary for the school's athletic program (no other high school in the City has such lights) nor how the lighting Project would be desirable in, or for, this particular neighborhood. Yet the Commission persists in promoting the Project's desirability (Finding 14A, 14C, the second Finding No. 6, 6A on page 9, and Finding 15).

**As the SINA discussed in their June 9, 2020 submittal, the wireless installation and the stadium lights have been cleverly combined into one project in order to justify the other's purposed benefits. Without the wireless component, the stadium lights have no benefit to the public or the neighborhood. We suggest that these obvious two separate projects must be decoupled and evaluated, each on their own merits, under the Planning Code. See also Sections 2 and 3 below.**

f. Section 251 states the purpose of height and bulk districts is to implement the Urban Design element and other elements of the General Plan, including these applicable provisions (paraphrased):

251(a) Relating the height of buildings to the height and character of existing development

251(b) Relating the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction

251(d) Promotion of harmony in the visual relationships and transitions between new and older buildings

251(e) Protection and improvement of the neighborhood environment

There are no buildings or structures including light standards or wireless installations in the surrounding neighborhood that even approach the 90-foot height of the proposed lighting towers. As discussed above, the Project is not in keeping with the character of the existing neighborhood and would certainly not serve to protect and improve the neighborhood environment. The towers would dominate the area (Figure 1) and do not support visual harmony. Yet the Commission justifies this Project as a conditional use (Finding 13C) under Section 253 and Section 260 (see Section 1.i below).

g. Section 253(a) allows the Commission to approve conditional uses that exceed District height restrictions. However, the Department (Finding 13C) completely ignores Section 253(b)(1) which states: "The Planning Commission shall consider the expressed purposes [emphasis added] of this Code, of the RH, RM, or RC Districts, and of the height and bulk districts…as well as the criteria stated in Section 303(c) of this Code and the objectives, policies and principles of the General Plan".

As noted throughout this discussion, the Commission has dismissed rather than thoughtfully considered the express purposes of any applicable Codes or policies. More importantly, the Commission has not articulated how the Project satisfies those purposes.

h. Section 303(c) (Motion Finding 14A, 14B) requires that a CUA can be granted only if the facts presented are such to establish that [emphasis added here and below]:

303(c)(1) The proposed use or feature, at the size and intensity contemplated and at the proposed location, will provide a development that is necessary or desirable for, and compatible with, the neighborhood or the community.

If the proposed use exceeds the non-residential use size limitations for the district, additional aspects must be considered. Those applicable to the stadium lighting Project include:

303(c)(1)(B) The proposed use will serve the neighborhood, in whole or in significant part…

303(c)(1)(C) The building in which the use is to be located is designed in discrete elements which respect the scale of development in the district

303(c)(2) Such use or feature as proposed will not be detrimental to the health, safety, convenience or general welfare of persons residing or working in the vicinity, or injurious to property, improvements or potential development in the vicinity, with respect to aspects including but not limited to the following:

303(c)(2)(A) The nature of the proposed site, including its size and shape, and the proposed size, shape and arrangement of structures

303(c)(2)(B) The accessibility and traffic patterns for persons and vehicles, the type and volume of such traffic, and the adequacy of proposed off-street parking and loading and of proposed alternatives to off-street parking…

303(c)(2)(C) The safeguards afforded to prevent noxious or offensive emissions such as noise, glare, dust and odor

303(c)(2)(D) Treatment given, as appropriate, to such aspects as landscaping, screening, open spaces, parking and loading areas, service areas, lighting and signs

303(c)(3) Such use or feature as proposed will comply with the applicable provisions of this Code and will not adversely affect the General Plan; and

303(c)(4) Such use or feature as proposed will provide development that is in conformity with the stated purpose of the applicable Use District.

As shown throughout these comments and in the CEQA appeal expert testimonial letters, the facts presented in the Project application documents do not clearly establish that the Project as a whole meets these requirements. The Motion does not provide any facts at all, merely contentions.

It is possible that the wireless installation as a stand-alone project could meet some of these Code and General Plan requirements (see Section 2 below), but the stadium lighting Project does not. Therefore, it is our opinion that a CUA is inappropriate and should not be granted in this case.

i. The Project was approved under Code Section 304, Planned Unit Developments or PUDs. Despite reference to the limitations in Section 304(d), the Department ignores some that are relevant to the Project, including these requirements:

304(d)(1) That the Project affirmatively promote applicable objectives and policies of the General Plan.

See Section 3 below for discussion of General Plan applicability.

304(d)(2) Provide off-street parking appropriate to the occupancy proposed.

The Motion simply states: "The Project is not required to provide off-street parking" (second Finding No. 6, 6B.2 on page 9).

While the school itself may not be required to provide off-street parking for normal school use, that is no justification for not requiring additional off-street parking for the stadium lighting Project. CHEE's CEQA appeal testimonial letter goes into great detail about the expected numbers of game attendees, the lack of existing neighborhood parking, the parking impacts of the Project, and the inadequacy of the school's Large Event Management Plan to provide sufficient parking capacity.

304(d)(6) That the Project be not excepted from any height limit unless it is explicitly authorized by the Code.

Technically the Project could be exempt from the 40-foot height restriction in Section 253 based on Section 260(b)(2)(I) and (b)(2)(J) which allow height exceedances for wireless facilities and other antennas, and "warning and navigation signals and beacons, light standards, and similar devices…", respectively (Motion second Finding No. 6, 6B.6).

However, it is profoundly unreasonable to consider 90-foot tall towers to be "light standards" at all, as if they were of similar scale to standard street light poles.

We challenge the Department to provide evidence of CUA approvals for such tall towers <u>on non-public property in an RH-1 district.</u> There are tall lighting towers at Kezar Stadium, Beach Chalet and South Sunset Playground, but these are all public facilities that provide public benefit to their local neighborhoods and the City at large.

Furthermore, the wireless installation does not require a 90-foot tower since the wireless equipment would be located at a maximum height of 66 feet. While still much higher than 40 feet, the wireless installation would have less of an overall visual impact on the neighborhood.

## 2. The Verizon Wireless project does not meet the requirements of the Wireless Telecommunications Services Facilities Siting Guidelines

The Motion's Finding No. 6 (the first No. 6 on pp. 4-5) summarizes Section 8.1 of the Wireless Telecommunication Services Facilities Siting Guidelines ("Guidelines")[8]. Finding 7 states the wireless installation would qualify as a Location Preference 2 Site (Co-Location Site), making it a "desired location".

The Wireless Guidelines are very clear in on what constitutes a preferred location, yet the Department's appeal response memorandum states: "on balance, the wireless portion of the Project is consistent with the Guidelines" and the General Plan. We believe that the Project should fully meet the Guideline requirements and it does not. The Department's "on balance" argument has no legitimacy, as discussed below.

a. Section 5 of the Guidelines relate wireless installations to the General Plan including the Urban Design and Commerce and Industry Elements.

b. Section 6 discusses "Quality of Life Considerations" for wireless installations. The first three considerations are the most important for this Project and all are related to the visual impacts of antennas.

   The Department has not considered or even mentioned the visual aspects associated with the wireless equipment, which would be located at a height of 34.75 feet to 66 feet above ground on the 90-foot lighting tower, rather only the ground-based lease area visual impacts are considered.

c. Section 7 of the Guidelines includes fifteen policies intended to address public concerns over wireless installations, three of which are directly applicable to this Project.

   - Policy LU2 is intended to ensure that a wireless facility "is compatible with the scale of the locale" or if not, that it is "necessary at that location".
   - Policy LU6 is intended to ensure that wireless siting is mitigated for and will positively address [emphasis added] the eight priority policies in Code Section 101.1 as well as the General Plan's Urban Design Element and its Neighborhood Environment section.
   - Policy UD1 is intended to ensure that wireless installations protect the scale, character and visual continuity of the neighborhood, and minimize visual obtrusion so as to protect the City's vistas and beauty. That Policy notes that wireless facilities "should be made as unobtrusive as possible".

   The scale of the Project has been discussed throughout this letter, SINA's prior submittals, and in the CEQA appeal. Again, the Project is strikingly incompatible with

[8] https://default.sfplanning.org/currentplanning/wireless/wtsguidelines.pdf

the scale or character of the neighborhood and would disrupt the visual continuity due to the height of the lighting tower to which the wireless installation would attach. Nor has Verizon equivocally shown that the wireless installation is necessary at this particular location.

d. Wireless Guideline Section 8.1 - Location Preferences is of primary importance here since the Department mis-applies location site preferences. Section 8 states: "The following location preferences…are intended to ameliorate any potential visual or neighborhood livability concerns" [emphasis added], while still allowing for vital telecommunication services. Figure 2 is a summary of the wireless location preferences[9].

   The Guidelines define a Preference 2 Co-Location Site as "any existing site on which a legal wireless telecommunications facility is currently located" [emphasis added]. Such locations are also subject to Code Section 101.1 and the General Plan.

9 https://sfplanning.org/sites/default/files/documents/publications/GeneralInfo_Wireless_Telecommunications_Services.pdf

**Figure 4. Wireless Guideline Location Preference Chart**

***Preferred Location Sites***

1. **Publicly-Used Structures** (police or fire stations, libraries, utility structures, etc.);
2. **Co-location Sites** (per the 2003 Supplement, must have been approved pursuant to the 1996 Guidelines);
3. **Industrial or Commercial Structures** (with removal of visual obstructions/clutter);
4. **Industrial or Commercial Structures** (without removal of visual obstructions/clutter);
5. **Mixed Use Buildings in High Density Districts** (per the 2003 Supplement, with alternative site analysis);

***Limited Preference Sites***

6. **Buildings in Neighborhood Commercial Districts** (with alternative site analysis demonstrating no other viable candidate);

***Disfavored Sites***

7. **Buildings in Zoned Residential Districts** (with alternative site analysis demonstrating no other viable candidate).

The Department completely ignores the fact that this location is not an existing co-location site and would require construction of a new tower. There are no other wireless installations on a lighting tower that itself does not already exist. We note ~~that~~ there are other (non-Verizon) wireless installations located on one or more of the school's rooftops which are relatively unobtrusive.

This is reason enough to separate the wireless installation and stadium lighting proposals (see Section 1.e above) so that each Project can be evaluated separately under the

Planning Code such that the purported benefits of each stand alone on their own merits and are not used to justify the other's purported benefits.

The Project cannot be considered a Co-Location Site, given that there is no pre-existing 90-foot tower and no pre-existing wireless installation on the non-existent tower. The only applicable site category is a Location 7 - Disfavored Site since even Location 6 – Limited Preference Sites are not applicable in an RH-1 District per the Guidelines.

Importantly, a Location 7 Site requires alternative site analysis, but Verizon did not conduct one stating, stating only "not applicable" in their March 28, 2020 CUA Application.

**It violates the Guidelines for this wireless installation to be approved without an alternative site analysis that shows no other viable alternatives. We further contend that are likely to be alternative sites (e.g., Location 1 or 2) on public structures or buildings in the area and Verizon must be required to conduct the alternative site analysis.**

## 3. The Project is not consistent with the General Plan

The CUA approval (Finding 14C, Finding 15) is based in part on Code Section 304(d) for Planned Unit Developments that require the Project to meet the conditional use criteria in Section 303(c) and elsewhere in the Code [emphasis added].

In addition, the Project "shall affirmatively promote applicable objectives and policies of the General Plan" [emphasis added]. The Department's appeal response memorandum also refers to the Section 303 requirement that the Project "will not adversely affect the General Plan" [emphasis added].

The appeal response memorandum justifies General Plan consistency by stating that the Commission "must often balance competing policies" yet the Department has not articulated exactly which policies were balanced or which policies compete with the few selective policies used to support the consistency determination.

**When balancing competing policies, it is incumbent upon the Commission to err on the side of protection not on the side of unnecessary development.**

The General Plan "is intended to be an integrated, internally consistent and compatible statement of objectives and policies, and its objectives and policies are to be construed in a manner which achieves that intent"[10] [emphasis added]. It is designed as a guide to the attainment of six general goals[11], three of which apply to this Project:

[10] https://sfgov.org/sfplanningarchive/ftp/General_Plan/index.htm
[11] https://generalplan.sfplanning.org/introduction.htm

- Protection, preservation, and enhancement of the economic, social, cultural, and esthetic values that establish the desirable quality and unique character of the city.
- Improvement of the city as a place for living, by aiding in making it more healthful, safe, pleasant, and satisfying…for all residents and by providing adequate open spaces and appropriate community facilities.
- Coordination of the varied pattern of land use with public and semi-public service facilities required for efficient functioning of the city, and for the convenience and well-being of its residents, workers, and visitors.

The only support for the consistency determination is the Department's restated contention that the Project would expand educational and recreational uses, that the lighting would have "nominal impact" on the neighborhood, that the night time use "is not expected to adversely impact traffic and parking", and that the Project "is desirable because it promotes the operation of a neighborhood-serving school". No evidence is provided that supports the truth of these statements, and therefore, they cannot be considered a valid basis for the consistency determination.

It is highly debatable that these statements are even true as the CEQA appeal and CEQA expert testimonials conclude relative to lighting, traffic and parking. Further, the school is not primarily a neighborhood serving school. The Project's educational and recreational uses are limited to their private students only and are not available to the broader neighborhood. It is common knowledge that few students live in the neighborhood and thus it is not a neighborhood-serving school as is the case with the two adjacent public schools.

We reviewed the public letters submitted to the Commission in support of the Project. Excluding duplicate letters, we identified only 16% of letters that came from the immediate neighborhood and only 18% from parents of current students. It is reasonable to expect that there should be many more supporting letters from neighbors if they had a direct connection to the school and would benefit from the Project.

The Commission claims that the Project is, "on balance", consistent with the General Plan; and that it "complies with and promotes <u>many</u> [emphasis added] of the Objectives and Policies of the General Plan" (Finding 14D).

However, consideration of consistency was limited to the few General Plan elements, objectives, and policies that could be leveraged to make the Project appear to be consistent, when it is clearly not.

**The Commission did not consider several pertinent aspects and ignores the spirit and intent of the General Plan as a whole.**

SINA's July 22, 2020 submittal to the Commission[12] went into great detail about the many ways the Project fails to meet the General Plan criteria. Section B therein summarizes the gross inadequacy of the Commission's General Plan evaluation and findings.

In particular, these aspects of the General Plan were completely ignored but are applicable and must be considered:

**Environmental Protection Element**

Objective 1 "Principles for City Pattern" table lists considerations including street trees (see Section 1.c above); and recommends that the local streets such as those abutting the school's athletic field should have lighting that is "low glare and warm color light".

Refer to CEQA appeal, K. Lagios expert testimonial letter which discusses that the proposed lighting would be a "cold" light in the blue color range.

Policy 11.1 discourages new uses in areas in which noise levels exceed the noise compatibility guidelines for the new use.

Refer to CHEE's CEQA appeal submittal Section 1 which discusses ambient neighborhood noise levels in comparison to the noise levels expected from the Project that would exceed noise compatibility guidelines.

**Urban Design Element**

Policy 1.1 addresses the importance of protecting major views in the city and seeks to protect viewpoints and limit obstructions that interfere with them.

The addition of four 90-foot towers with large lighting arrays at the top in a 40-foot height District clearly constitutes an obstruction that would adversely impact viewpoints from locations such as Golden Gate Heights Park, Larson Peak, and Sunset Reservoir Park – all of which have sweeping views of the Sunset District and ocean.

Policy 1.12 addresses the special character of some neighborhoods with "unusually fortunate relationships of building scale, landscaping, topography and other attributes".

As noted in Section 1 above, the addition of 90-foot towers would greatly impinge upon the existing scale of the neighborhood given their vast size and scale that would loom over the street directly across the street from front windows of neighboring homes.

Similarly, Objective 2 covers conservation of resources and the "Fundamental Principles for Conservation" table, item #17 states: "Blocking, construction or other impairment of pleasing street views of the Bay or Ocean, distant hills, or other parts of the city can destroy an important characteristic of the unique setting and quality of the city."

[12] Op. cit. Footnote 4. https://docs.google.com/document/d/1tnLYBpZMoCu-rsKzRUBUmcrwfZ_lSXNcAwL3cmhrOgc/edit?usp=sharing

The addition of 90-foot towers with large lighting arrays would certainly impair the pleasing street views from east of the school toward the ocean and from west of the school up toward the Inner Sunset District and open hillsides.

Objective 3 covers neighborhood environments including health and safety, especially traffic. The Objective states: "Some neighborhoods have greater needs because their residents live in conditions of greater density, or because the residents include more children and older people who tend to live within a smaller world in which the resources close at hand are the most important."

The neighborhood surrounding the school has a large population of elderly and families with small children, along with two public schools, a library, and a public recreation area used by neighborhood children and adults. Neighborhood residents would definitely be affected by the increased traffic and related health and safety impacts that the stadium lighting project would bring. Refer to the neighbor testimonials in the Attachments to SINA's September 17, 2020 appeal submittal, and Section 2 of CHEE's CEQA appeal submittal which discusses the potential impacts of the Project on traffic, parking, and public safety.

Objective 4 covers improving neighborhood environments to increase personal safety, comfort, pride and opportunity. Importantly, the preamble to Objective 4 Policies states: "Neighborhood quality is of overriding importance to the individual, since the most basic human needs must be satisfied close to home… [p]eople wish to have a tolerable and comfortable living environment, safe and free from stress, and the elements that make up such an environment are easily described. People also wish to know that their neighborhoods will be guarded against physical deterioration, and that any elements they consider deficient are likely to be improved".

Policy 4.1 states: "In order to reduce the hazards and discomfort of traffic in residential neighborhoods, a plan for protected residential areas should be put into effect…"

We note that the area surrounding the school between Noriega and Taraval Streets is a protected residential area[13] and if this designation is to have any real meaning, it must be taken into consideration when considering traffic impacts from the Project.

Policy 4.14 addresses distracting and cluttering elements and states: "Every other element in street areas…should be examined with a view toward improvement of design and elimination of unnecessary elements."

Clearly, 90-foot towers with their large light arrays constitute significant clutter that is unnecessary for the neighborhood and should be avoided in the protected residential area. Stadium lighting is not necessary for the school's athletic program to continue be successful as demonstrated by other, larger schools in the City that do not need lights.

Policy 4.15 addresses protection of the livability and character of residential properties from the intrusion of incompatible development including regulated setbacks. The Policy states that setback standards, and other standards that "contribute to the livability and character of residential neighborhoods, should be safeguarded and strengthened."

[13] https://generalplan.sfplanning.org/images/I5.urban_design/urb_map7.pdf

Allowing the school to modify its rear yard setback restriction down to virtually no setback in an RH-1 district and allowing 90-foot towers in a 40-foot height district even if exempted, is inconsistent with this policy.

**Commerce and Industry Element**

Policy 6.9 is ignored. It goes into great detail about conducting evaluations of traffic and parking and requires consideration of the surrounding residential neighborhoods. Most importantly, the Policy states that the proposed use should not be allowed if there is significant traffic congestion or inadequate parking.

Refer to the CEQA appeal and CHEE's CEQA expert testimonial letter for details on the current and expected level of traffic and parking impacts from the Project.

**Housing Element**

Policy 10.1 provides important context relevant to the lighting project. The policy states in part**: "**There is a clear public benefit to creating, and applying, a strict approach to regulatory land use controls" [emphasis added].

As discussed in Section 1 above, the rear yard setback modification and the allowance of 90-foot "light standards" under Code Section 260(b)(2)(J) that would allow two of the stadium lights and the Verizon wireless ground-based installation directly inside the property line. These allowances are abnormal applications of the Planning Code and ignore the spirit and intent of the General Plan's strict approach.

Policy 11.3 states: "Ensure growth is accommodated without substantially and adversely impacting existing residential neighborhood character" [emphasis added].

It has been shown clearly through SINA's prior submittals, the CEQA appeal and expert testimonials, and neighbor testimony, that the stadium lighting would substantially, adversely, and permanently impact the neighborhood's character - from a Project that cannot be considered necessary growth since there is no "growth" associated with this Project (e.g., the school has not expanded its enrollment).

Most of the stated Project benefits delineated in the Motion for the few General Plan elements that were considered apply only to the wireless installation and not to the lighting project at all. Again, this is sufficient reason to decouple the two projects and evaluate them separately for General Plan consistency. Other Plan elements that were considered were mostly mis-applied to the lighting project in ways that ignore the spirit and intent of them. We will not review those here (refer instead to Section B of SINA's prior submittal[14]). However, the Commission should re-consider them and provide a sound rationale for each in response to SINA's prior comments.

**Ultimately, the wholesale dismissal and/or mis-application of numerous General Plan aspects cannot support the Department's "reasonable" finding of "balancing competing policies" or of General Plan consistency.**

[14] Op. Cit. Footnote 10.

## 4. The Lighting Project may not meet Police Code Noise requirements

The Summary of CUA Issues above notes that the Board of Supervisors and the Commission must consider the Planning Code and other applicable Codes within the context of the General Plan. State law requires that the General Plan address seven specific issues including noise[15]. The California Supreme Court has also held that the purview of the General Plan extends beyond zoning and land use[16].

**Our review of the regulations, discussed below, clearly demonstrates that Project-related noise are subject to other applicable codes and must be considered as part of the CUA evaluation and General Plan consistency determination.**

Noise is regulated under the Police Code rather than the Planning Code. Article 1, Section 49 regulates unnecessary noise and references other sections of the Police Code that are also applicable to this Project.

- Section 49(a) states: "Except as provided in Article 15.1 of this Code…it shall be unlawful for any person to use, operate, maintain, or permit to be played, used, or operated any…broadcasting equipment, or other machine or device for the producing, reproducing, or amplification of sound or human voice in such manner as to produce raucous noises or in such manner so as to disturb the peace, quiet, and comfort of persons in the neighborhood [emphasis added], or with volume louder than is necessary for convenient hearing for the person or persons for whom said machine, instrument, or device is operated.

- Section 49(c) states: "The operation of any such…broadcasting equipment, machine, or device at any time in such a manner as to cause a noise level in excess of the standards set forth in Article 29 of this Code shall be *prima facie* evidence of a violation of this Section 49 [emphasis added].

- The referenced Police Code Article 15.1, Section 1060.16 regulates outdoor amplified sound under the Code's entertainment permit regulations.

    - Section 1060.16(a) states in part: "The use or operation of amplified sound equipment to project sound outside of any building or at any location out of doors in the City may be detrimental to the health, welfare, and safety of the inhabitants of the City, in that such use or operation diverts the attention of pedestrians and vehicle operators in the public streets and places, thus increasing traffic hazards and potentially causing injury to life and limb. Further, such use or operation may disturb the public peace and comfort and the peaceful enjoyment by the people of their rights to use the public streets and places for street and other public purposes, and may disturb the peace, quiet, and comfort of the neighboring inhabitants" [emphasis added}.

[15] https://sfgov.org/sfplanningarchive/ftp/General_Plan/index.htm
[16] https://sfplanning.org/project/san-francisco-general-plan

- Section 1060.16(b)(2) states: "Amplified speech and music shall not be unreasonably loud, raucous, or jarring to persons of normal sensitivities within the area of audibility, nor louder than permitted…".

- Section 1060.16(b)(3) states: "The volume of outdoor sound shall be controlled so that it will not be audible for a distance in excess of 250 feet from the property line of the Business or premises or from the periphery of the attendant audience".

- The referenced Police Code Article 29 provides noise limits for various use categories. The associated Noise Guideline[17] provides a table in Appendix A that lists applicable noise standards and thresholds for different sources of noise emission. There is no category for educational institutions nor is there an applicable exemption for schools, therefore the most applicable category is for commercial/industrial property noise regulated under Section 2909(b).

  - Section 2909(b) sets a noise limit not to exceed eight decibels above the ambient at any point outside of the property plane, from any combination of mechanical device(s) and implied sound systems(s).

CHEE's CEQA appeal expert testimonial letter (September 17, 2020) discusses ambient noise levels in the immediate neighborhood and analyzes the noise levels expected at Saint Ignatius that result from amplified sound as well as crowd noise and game or practice whistles.

That analysis shows that noise levels are likely to exceed 8 decibels above ambient and it is ~~quite~~ likely that the school is currently violating this standard even without stadium lighting. Neighbor testimony including audio recordings of day time noise from practices supports our CEQA analysis and demonstrates the history of neighbor noise complaints for day time use, and evening football games conducted under temporary lighting (see Attachments 2 – 5 in SINA's appeal letter, September 17, 2020).

**Therefore, noise levels from the Project must be considered as part of the CUA evaluation and General Plan consistency determination.**

## 5. The school has repeatedly violated the practice field lighting CUA No. 2003.1273C and Planning Code Section 205.4(b)

As noted in the Summary of CUA Issues above, we contend that the Board of Supervisors and the Commission must consider the school's past violations when looking "on balance" to approve a new CUA. A Project Sponsor or a Planned Unit Development that has shown past disregard for important City codes must have new applications scrutinized closely to assure that any new project or development will remain in compliance with new approvals.

[17] Op. cit. Footnote 4.

- The CUA that authorized practice field lighting included Condition 3 that requires lights to be shut off by 7:30 pm any time they are in use.

  **Neighbors have reported that the shut off restriction is not followed by the school and not enforced.** For example, one neighborhood testimonial email to the Commission[18] noted that the school's practice field lights "are meant to be turned off at 7:30 but are routinely left on past 9 pm. When calling the school, they refuse to turn these lights off". Other neighbors have reported similar violations of that CUA since its 2003 authorization.

- Code Section 205.4 regulates temporary uses and requires authorization for outdoor intermittent activities that occur occasionally but with some routine or regularity. The school has rented temporary lights for use at the stadium for several years, but we could find no authorizations for such use in the school's Planning Department records. In 2019 these rentals took place for an 8 week period according to neighbor testimony, and the lights were left in place the entire time. The lights were brought back in early 2020 for a two-week period. The school informed neighbors of the 2019 plan for temporary lighting but failed to notify neighbors of the 2020 usage, stating they "forgot" to do so. The school representative also stated that a permit was not needed.

- Code Section 205.4(b) disallows intermittent activities in a RH District <u>only</u> if it is located on a parcel that contains or is part of a hospital, a post-secondary educational institution, or a public facility.

  **As a secondary educational institution in an RH-1 District, the school is not even allowed to conduct such activities. Had the school sought approval, the Department should have informed them that the temporary use could not be authorized. Therefore, the school has operated in violation of this Code.**

In conclusion, this analysis shows the myriad aspects of the Project that the Commission has not adequately considered. Therefore, in my professional opinion, the CUA cannot be approved until all applicable codes and policies are evaluated and the Project can demonstrate compliance with applicable codes and the General Plan.

Sincerely,

Maryalice Fischer

Maryalice Fischer
Executive Director, CHEE LLC

Attachment 1. Abbreviated list of related CHEE projects

[18] Attachment 2 in SINA's September 17, 2020 appeal letter

**Attachment 1**

**Abbreviated list of projects relevant to this CUA appeal that were completed by CHEE, or independently by CHEE staff**

Regulatory Compliance and Oversight

- Assessed regulatory requirements at the federal, state and local levels; developed detailed comprehensive regulatory compliance implementation plans; conducted staff training; and/or assisted in permit applications and permit compliance reporting for the following organizations:
    - US Internal Revenue Service
    - US National Park Service
    - US Food Safety and Inspection Service
    - New Hampshire Department of Transportation
    - Siemens Industry, Inc.
    - Granite State Electric Company
    - New England Power Inc.
    - TransCanada
    - North American Energy Services
    - Constellation Energy
    - Dominion Energy
- Conducted confidential audits of regulatory compliance with applicable federal and state statutes and their implementing regulations, and with local codes and ordinances; reported findings and made detailed recommendations on compliance needs to upper management of the following organizations:
    - US General Services Administration - Hartford CT
    - US Geological Survey - Sacramento CA and Pawtuxent MD
    - US National Park Service at over 30 national park and historic sites in 13 states
    - US Generating Company (then a subsidiary of Pacific Gas & Electric Co.) at facilities in six states

| | |
|---|---|
| **From:** | SISunsetNeighbors @hotmail.com |
| **To:** | BOS Legislation, (BOS); Board of Supervisors, (BOS) |
| **Cc:** | Mar, Gordon (BOS) |
| **Subject:** | Email 2: BOS File #200992 CEQA Appeal Supplement – Saint Ignatius Stadium Lighting (Planning #2018-021648CUA) |
| **Date:** | Thursday, September 17, 2020 11:06:48 AM |
| **Attachments:** | Outlook-iwidtgvy.png<br>BOS File #200992 - CEQA Appeal Supplement - CHEE LLC - 2020_09_17.pdf<br>BOS File #200992 - CEQA Appeal Supplement - Kera Lagios - 2020_09_11.pdf |

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This message is from outside the City email system. Do not open links or attachments from untrusted sources.

**To: Clerk of the Board of Supervisors**
**Fr: SI Neighborhood Association**

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Attached please find two documents that supplement the CEQA appeal filed under BOS File #200992 for the Saint Ignatius Stadium Lighting Project.

Please kindly confirm receipt.
Thank you

Deborah Brown, Secretary

SI Neighborhood Association

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**The Center for Health, Energy & the Environment, LLC**

PO Box 424 Strafford, NH 03884
Voice: 603.664.5097 Fax: 603.664.5109
CHEE@myfairpoint.net

**September 17, 2020**

Attn: Angela Cavillo, Clerk of the Board of Supervisors
San Francisco City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102
Via email: Board.of.Supevisors@sf.org, bos.legislation@sf.org

**RE: Planning Case Number 2018-012648CUA - Saint Ignatius Stadium Lighting Project**

Honorable Members of the Board of Supervisors:

I am writing on behalf of the Saint Ignatius Neighborhood Association ("SINA") concerning the proposal to install stadium lighting towers and a wireless telecommunications facility at the J.B. Murphy Field Stadium ("stadium" or "field") of Saint Ignatius College Preparatory ("Saint Ignatius" or "school") located at 2001 37th Avenue. Saint Ignatius is a private secondary school located in a residential neighborhood in the Outer Sunset District.

SINA is an association comprised of over 165 neighbors who live in the area surrounding the school. The organization was formally registered as a community/neighborhood organization with the San Francisco Planning Department in October 2016.

The Planning Commission granted Conditional Use Authorization (Case No. 2018-012648CUA) for the stadium lighting project ("Project") on July 23, 2020 (Motion No. 20769). The Motion incorporated the Planning Department's June 3, 2020 CEQA categorical exemption determination. Pursuant to San Francisco Administrative Code Section 31.16(e), Mr. Michael Graf, Esq. on behalf of SINA filed a timely appeal of the CEQA exemption on August 24, 2020[1].

This letter provides additional information in support of the CEQA appeal. It expands upon SINA's previous submittals for the Project's Planning Commission hearings (Advance Materials submittal May 6, 2020 and supplements dated June 9, 2020[2] and July 22, 2020[3]) and includes results of CHEE's analysis of the proposed Project relevant to the CEQA appeal.

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[1]BOS File No. 200992 https://sfgov.legistar.com/View.ashx?M=F&ID=8761932&GUID=9AE437DD-D0C7-42DC-AEA3-0879363996D4
[2] Included as Exhibit J in the July 23, 2020 Commission hearing packet. https://commissions.sfplanning.org/cpcpackets/2018-012648CUAc1.pdf
[3] Available at https://docs.google.com/document/d/1tnLYBpZMoCu-rsKzRUBUmcrwfZ_lSXNcAwL3cmhrOgc/edit?usp=sharing

## Qualifications of the Center for Health, Energy & the Environment, LLC

The Center for Health, Energy & the Environment, LLC ("CHEE") is a boutique consulting firm specializing in environmental and regulatory analysis, permitting, and compliance monitoring. Our staff have over 40 years of technical expertise in regulatory interpretation including the National Environmental Policy Act (NEPA) and state equivalents; natural resource assessment and mitigation; construction and recreation planning and permitting; environmental monitoring and measurement; environmental data analysis; and reporting for compliance. We have provided services across more than 30 states including California for clients such as federal and state agencies, multi-national corporations, regional planning commissions, municipalities and non-profit organizations. A sample of CHEE's project experience relevant to this CEQA appeal is summarized in Attachment 1.

## Project Summary

The Project Sponsors (Saint Ignatius and Verizon Wireless) propose to add four 90-foot tall lighting towers to the stadium which borders Rivera Street and 39th Avenue. The lighting towers are intended to allow for up to 150 nights a year of weekday evening use for athletic practices, games and events lasting until 9 pm, and until 10 pm for up to 20 Friday or Saturday nights per year. In addition, on the proposed northwest light tower (at 39th Avenue near Quintara Street), the Project Sponsors seek to install and operate a wireless telecommunication service facility, consisting of antennas, remote radio units, and surge suppressors located at a height of 34 to 66 feet above ground on the tower, as well as ancillary equipment in a lease area located on the ground within a fenced compound adjacent to 39th Avenue near Quintara Street.

At this time there is no lighting at the stadium, which means the Project would constitute a significant expansion of use of the field on virtually every weekday evening in the late fall, winter, and early spring seasons, as well as on some weekends - from the time of sunset between 5 and 6 pm without field lights - to 9 to 10 pm under the proposed Project. The school currently has field lighting at their smaller practice field, authorized under a separate CUA (Case No. 2003.1273C, Motion No. 16770). Practice field lighting is authorized for use only until 7:30 pm.

## Additional information related to CEQA appeal filing

Section B.1.b of the CEQA appeal filing stated "There is a reasonable possibility that noise, parking, traffic, and public safety impacts caused by expanding use to games, events and practices until 9 or 10:00 pm nights a year may be significant."

CHEE has analyzed these factors and the discussions in Sections 1 and 2 below summarize our findings. We also offer additional input in Section 3 on another aspect of CEQA that is relevant to this Project, specifically the potential adverse effects on sensitive wildlife species due to the Project's lighting and noise impacts.

## 1. Noise - There is a Reasonable Possibility that Impacts will be Significant

CHEE conducted an analysis of expected noise levels for the Project and it is our opinion that stadium-related activities would exceed applicable noise thresholds by a factor of two to three, and noise levels would exceed ambient noise levels up to four times in the immediate neighborhood, resulting in a significant impact. Our analysis and conclusions are discussed below.

### a. Background

The Planning Department did not require a noise study for the Project, suggesting that no study was needed because there would be "no substantial permanent increase in ambient noise levels in the project vicinity or persons in excess of noise level standards". The CEQA exemption determination stated that the existing use of the athletic field would only be shifted from day time to evenings, and that a new public address "(PA") system would be installed and designed to direct sound away from the neighbors during games.

The Project Sponsors have provided no noise related information to support the Department's noise finding. In fact, there are no details about a purported new PA system, and no new system is explicitly included in the Project scope nor mentioned in any the CUA or CEQA application documents, nor in the Commission's CUA approval motion. Yet, the CEQA exemption assumes that a new system will be installed and that it will be an improvement over the existing PA system. Yet, CEQA requires that the effectiveness of mitigation measures be evaluated in a CEQA review process, not as part of an exemption determination.

The only available noise level information was provided at a September 15, 2015 neighborhood meeting (Appendix 4b of SINA's Planning Commission hearing submittal dated May 6, 2020) wherein the school's representatives 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." This statement does not support the idea of a new PA system. The school's representatives also indicated in that meeting's document that they had measured sound levels at an event and concluded that the sound level was not "excessive". Based on the lack of details provided, it cannot be assumed that the measurements were conducted in accordance with generally accepted standards for measuring noise or in accordance with the San Francisco Noise Guideline protocols[4].

Even if the measurements were valid, they cannot be considered representative of a game with high attendance such as a football game. The event was a "ProCamps" football camp[5] for children in grades 1 through 8. The noise measurements were taken on the second day of the event which was a Sunday in late June 2015. Images from the event (footnote 2) show that the school's bleachers were nowhere near full as they would be for a large football game, and it is not known whether the PA system was even in use at the time of noise measurement.

[4] https://www.sfdph.org/dph/files/EHSdocs/ehsNoise/GuidelinesNoiseEnforcement.pdf.
[5] https://www.ninersnation.com/2015/6/23/8829195/colin-kaepernicks-third-annual-procamps.

**b. Noise Level Analysis**

**Noise levels emanating from games at the Saint Ignatius athletic field would be significantly higher than ambient levels. Peak noise levels would be nearly quadruple ambient levels along 39th Avenue which is located within 50 feet of the edge of the playing field. Along Rivera Street, about 113 feet from the playing field, noise levels would be two to three times higher than ambient levels.**

It is the Project Sponsors' responsibility to conduct a valid noise study; however, CHEE has conducted a quantitative desktop analysis to estimate the potential noise levels for this Project. We reviewed available noise studies from CEQA Environmental Impact Reports (EIRs) conducted for similar high school stadium lighting projects to obtain a proxy for the range of noise levels that might be expected at this Project. Readily available noise studies were selected so as to be generally comparable to Saint Ignatius based on game attendance or spectator capacity, and similarity of the surrounding residential neighborhoods. Four comparative studies were selected:

- San Marin High School, Novato, CA[6]
- San Mateo High School, San Mateo, CA[7]
- Hillsdale High School San Mateo, CA[8]
- Aragon High School San Mateo, CA[9]

A subset of monitoring locations from each study was selected using those closest to neighboring residential streets, similar to the neighborhood locations of concern for the Saint Ignatius Project. Distances were taken from the study reports and adjusted so that each monitoring location is measured consistently from the nearest approximate edge of the football field playing surface to the monitoring location.

Table 1 presents a summary of the short term noise measurements (ranging from about 10 to 15 minutes each) that were obtained during varsity football games at each school. Measurements were taken for the PA system, crowd noise, game whistles, and in some cases for crowd and PA system noise combined. The values were recorded as the highest sound pressure level (Lmax) during the measuring period and reported in A-weighted decibels (dBA)[10]. Values were reported as a range of values or as discrete values at each monitoring location.

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[6] San Marin Stadium Lights Project Final Environmental Impact Report. May 2017. https://3b9svs2dfskd3fzwfu347pov-wpengine.netdna-ssl.com/wp-content/uploads/2019/10/SMHS-Project-Final-EIR-Sections-1-7.pdf.

[7] San Mateo Union High School District Draft Environmental Impact Statement. May 2016. https://www.smuhsd.org/cms/lib/CA02206192/Centricity/Domain/1242/Community_StaduimLights_CEQA_SMUHSDStadiumImprovementProjectDraftEIR.pdf and Initial Study. February 2016, see Appendix D in: https://www.smuhsd.org/cms/lib/CA02206192/Centricity/Domain/1242/Community_StaduimLights_CEQA_SMUHSDStadiumImprovementProjectDraftEIRAppendicesA-F.pdf.

[8] Ibid.

[9] Ibid.

[10] A-weighting accounts for the relative loudness perceived by the human ear at different frequencies on sound, and it discounts low frequencies since the ear is less sensitive to those frequencies.

**Table 1. Summary of Maximum Noise Levels during Comparable High School Football Games**
**(Note: "n/a" indicates no value was reported)**

| School | Day of Week and Time of Measurement | No. of Spectators | Monitoring Site No. and Location | $L_{max}$ dBA | | | |
|---|---|---|---|---|---|---|---|
| | | | | PA System | Crowd | Crowd + PA | Game Whistle |
| San Marin | Saturday 08/27/16 ~2-3:15 pm | 594 | ST1 – edge of property ~170 ft away from end of field | 62 | 70 | n/a | 72 |
| | | | ST3 – across street ~215 ft away from long side of field | 61 | 65 | n/a | 64 – 71 |
| | Saturday 11/05/15 ~2-3:15 pm | 1,200 | ST1 – edge of property ~170 ft away from end of field | 67 – 74 | 72 | n/a | 54 – 65 |
| | | | ST3 – across street ~215 ft away from long side of field | 57 – 64 | 60 – 70 | n/a | 61 |
| San Mateo | Friday 10/30/15 ~ 7-8 pm | Not stated, 3,136 capacity | ST1 – across street ~330 ft away from end of field | 57 | 64, 67 | 66 | n/a |
| | | | ST2 – across street ~190 ft away from long side of field | 60, 63, 64, 66 | 75 | n/a | 60, 60, 65, 66 |
| | | | ST3 – within property ~110 ft away from end of field | n/a | 66, 71, 74 | n/a | 63, 64, 66 |
| Aragon | Friday 11/06/15 ~ 8-8:30 pm | Not stated, 698 capacity | ST1 – across street ~150 ft away from end of field | 66, 65 – 72 | 73 | 88 - 91 | n/a |
| | | | ST2 – across street ~150 ft away from end of field | 56 – 60 | 59 | 61 | 53, 55 |
| Hillsdale | Friday 11/13/15 ~ 7:30-8 pm | Not stated, 988 capacity | ST2 – across street ~150 ft away from long side of field | 69 – 73 | 71 - 77 | 74 - 85 | n/a |
| | | | ST3 – across street ~160 ft away from end of field | 64 – 72 | 71 - 74 | 76 - 80 | n/a |

The data in Table 1 shows the maximum recorded noise levels at all four schools during the five different football games was: 72 dBA from whistles, 74 dBA from PA systems, 77 dBA from crowd noise, and 91 dBA for a PA system and crowd noise combined. These levels were recorded at distances ranging from approximately 110 feet to 330 feet from the edge of the playing fields.

At Saint Ignatius, the perpendicular distance from the edge of the west (long) side of the field to the adjacent sidewalk on 39$^{th}$ Avenue is approximately 48 feet, and approximately 113 feet to the adjacent sidewalk on Rivera Street from the edge of the field's south end. Sound levels attenuate (decrease) by 6 dB for each doubling of distance from a point source (e.g., PA system speaker). All other things being equal, noise levels emanating from the Saint Ignatius field during football games would be significantly higher than the Table 1 values since all of those measurements were taken at locations farther away from the source than the school property lines at 39$^{th}$ Avenue and Rivera Street.

The San Marin measurements in Table 1 were taken at two games with known spectator counts (594 and 1,200) and provide a general example of the minimum noise levels expected from the PA system, crowds, and game whistles at Saint Ignatius football games – with their higher expected attendance of 1,000 to 2,800 people (Exhibit A of Commission Motion No. 20769). Monitoring site ST1 was selected to represent Rivera Street, and site ST3 to represent 39$^{th}$ Avenue.

Aragon site ST1 was selected to represent to Rivera Street, and Hillsdale site ST2 to represent 39$^{th}$ Avenue for comparison of the combined crowd and PA system noise levels that were measured at those schools. Crowd size was not provided in those noise studies, but stadium capacity is smaller at both schools (698 at Aragon, 988 at Hillsdale) than Saint Ignatius, so again, the calculated equivalent noise levels are considered minimums for the purpose of estimating noise levels at Saint Ignatius.

Based on these considerations, the representative data from Table 1 was converted to equivalent noise levels at 39$^{th}$ Avenue and Rivera Street as shown in Table 2, using the formula:

$$Lp(R2) = Lp(R1) - 20 \times Log_{10}(R2/R1)$$

Where:

Lp(R1) = Sound pressure level at closer location
Lp(R2) = Sound pressure level at farther location
R1 = Distance from the noise source to closer location
R2 = Distance from noise source to the farther location

**Table 2. Calculated Maximum Noise Level Estimates at Saint Ignatius**

| Comparison Location | Study Location and Game | $L_{max}$ dBA at Comparison Location | | | |
|---|---|---|---|---|---|
| | | PA System | Crowd | Crowd + PA | Game Whistle |
| Rivera St. | San Marin ST1 small game | 65.6 | 73.6 | | 75.6 |
| | San Marin ST1 large game | 70.6 – 77.6 | 75.6 | | 57.6 – 68.6 |
| | Aragon ST1 | | | 90.5 – 93.5 | |
| 39th Ave | San Marin ST3 small game | 74 | 78 | | 77 - 84 |
| | San Marin ST3 large game | 70 – 77 | 73 – 83 | | 64 |
| | Hillsdale ST2 | | | 83.9 – 94.9 | |

The San Marin noise study also monitored noise at games and practices other than varsity football games. An hourly $L_5$ measurement was used which denotes the noise level exceeded 5% of the time within an hour-long measurement period. Table 3 shows the results converted to equivalent noise levels expected at Saint Ignatius although the San Marin study did not specify crowd size or whether the PA system was in use at the time.

**Table 3. Calculated 5% Exceedance Noise Level Estimates at Saint Ignatius**

| Comparison Location | Study Location | $L_5$ dBA at Comparison Location | | | |
|---|---|---|---|---|---|
| | | Varsity Football | Freshman and Junior Varsity Football | Non-Football Games | Practice |
| Rivera St. | San Marin ST1 | 74.6 | 68.5 | 67.6 | 60.6 |
| 39th Ave | San Marin ST3 | 84 | 79 | 78 | 65 |

### c. Discussion

**This analysis finds there is a reasonable possibility that noise impacts from the proposed Saint Ignatius Project would be significant, unavoidable, and are unlikely to be fully mitigated.**

In general, a 3 dB change in noise level is noticeable, and a 10 dB increase is perceived as a doubling of loudness[11]. Noise that occurs during the evening (7 – 10 pm) and night time (10 pm – 7 am) is considered more disturbing to people than the same level of noise occurring during the day since ambient noise levels are typically lower in the evening and night time than they are during the day, particularly in residential neighborhoods. Many noise ordinances account for this phenomenon using the Community Noise Equivalent Level (CNEL) which is a weighted sound level over a 24 hour period, including a "penalty" of 5 dB added between 7 and 10 pm and a penalty of 10 dB added for the nighttime hours of 10 pm to 7 am.

CEQA does not provide quantitative noise level threshold limits for determining the significance of a noise impact. Instead, CEQA refers to local ordinances, adopted agency standards, and the potential for a project to significantly increase noise levels above those present without the Project. The applicable local standards are the San Francisco Police Code (Article 1, Section 49, Article 15.1, and Article 29) and the San Francisco General Plan (Environmental Protection Element, Policies 10.1 and 11.1).

Under the San Francisco General Plan, Environmental Protection Element, Objective 10 seeks to minimize the impact of noise on affected areas [emphasis added] and Policy 10.1 promotes site planning, building orientation and design, and interior layout that will lessen noise intrusion.

Policy 11.1 discourages new uses in areas in which the noise level exceeds the noise compatibility guidelines for that use. The associated Land Use Compatibility Chart for Community Noise[12] identifies community noise exposures for various land use categories including outdoor spectator sports. The online chart shows that for outdoor spectator sports uses at all (background) community noise levels, new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design [emphasis added]. The associated Map 1[13] shows 24-hour average neighborhood ambient noise levels, penalized for night but not penalized for evening hours.

Ambient levels in the neighborhood immediately surrounding the Saint Ignatius stadium are shown in the Map to be approximately 55 to 60 dBA, with only the corner of Rivera Street near 37th Avenue in the 60 to 65 dBA range.

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[11] Cowan, James P. 2004. Handbook of Environmental Acoustics.
[12] https://generalplan.sfplanning.org/I6_Environmental_Protection.htm#ENV_TRA_10.
[13] https://generalplan.sfplanning.org/images/I6.environmental/ENV_Map1_Background_Noise%20Levels.pdf

San Francisco Police Code Article 29 Section 2909 regulates noise and the Noise Guideline[14] provides a table in Appendix A that lists applicable noise standards and thresholds for different sources of noise emission. There is no category for educational institutions nor is there an applicable exemption for schools, therefore the most applicable category is for commercial/industrial property noise which has a noise threshold not to exceed 8 dBA over ambient noise levels at the property line. That threshold is equivalent to 63 - 68 dBA for most of the immediate neighborhood surrounding the stadium.

Tables 2 and 3 above show that the estimated peak noise levels from games and even practices would exceed these ambient thresholds, creating two to four times the level of noise along 39th Avenue since each 10 dB increase in sound doubles the effect.

Appendix A of the Noise Guideline also specifies an 80 dBA maximum noise level from construction equipment between 7 am and 8 pm at a distance of 100 feet from the source. If the stadium lighting is installed, Saint Ignatius games and practices will last until after 8 pm and noise levels at the property line could far exceed even that high threshold for football games (Tables 2 and 3).

Furthermore, the CEQA exemption determination stated: "The new sound system would be designed to direct sound away from the neighbors during games". As noted above, even if a new PA system were to be installed, it would be extremely difficult if not impossible, to direct sound away from the neighbors and mitigate noise spillover into the neighborhood. To do so would require a sophisticated system design and moment-to-moment adjustments in the sound levels emanating from it. A PA system is intended to provide sound that is audible to fans on the bleachers located along both long sides of the stadium. Air temperature gradients and wind can steer sound in unintended directions, a particular problem during night football games, as cool fall air sits over surface level air that has been warmed all day by the sun. Moisture in the air will absorb high frequencies making amplification of voice announcements muddier and harder for fans to hear under fog conditions. To have clear intelligible spoken information, a PA system needs to be 6 to 10 decibels louder than crowd noise[15] which would further exacerbate overall sound levels during games.

There are few if any acoustic sound dampening elements at or around the school that would reduce noise spillover from the field into the surrounding neighborhood. There are only small shrubs bordering Rivera Street and only three street trees - one on Rivera Street and two on 39th Avenue – that could potentially help to mitigate some excess noise effects - but the CEQA determination notes that no streetscape changes are proposed for this Project. This issue is discussed in more detail in Section 1.c of CHEE's expert testimonial letter in support of the CUA appeal.

[14] Op. cit. Footnote 4.
[15] https://www.athleticbusiness.com/designing-sound-systems-to-meet-stadium-audio-challenges.html

### d. Noise Impact Conclusions

Each of the comparative four noise studies cited above found that noise impacts from lighted games and practices would exceed applicable noise thresholds and would be "significant and unavoidable".

It is important to note that Saint Ignatius has stated that part of the purpose of the lights is to increase attendance at games. The 2018 CUA application states: "The lights will enable the school to have night games; increasing parental participation at games…" Saint Ignatius' own estimate of current Saturday game attendance ranges from 750-1,000 historically and from 500 – 1,100 in 2019[16].

The Project permit proposal dated April 29, 2020 anticipated 800 – 1,500 spectators for night time football games. More telling is the school's Night Game or Large Event Management Plan[17] developed to manage games and events with "anticipated attendance of 1,000 to 2,800 people" [emphasis added]. Therefore, expected noise levels would be significantly higher for Friday night games than for the current Saturday games with lower attendance.

The comparison noise studies were conducted at games with attendance no more than 1,200 people (San Marin, Aragon, Hillsdale). Those noise levels, when converted to equivalent levels at Saint Ignatius as shown in Tables 2 and 3, are expected to be greatly exacerbated at Saint Ignatius with night game attendance that could double in size from current Saturday game attendance levels.

Neighbors have repeatedly reported their concerns and complaints about noise from day time practices and games, as well as from night time games that took place under temporary rented lights (see CEQA appeal filing, August 24, 2020). The complaints date back to 2015 when the Project was first proposed in letters to then Supervisor Katy Tang, and more recently in testimonial letters to the Planning Commission for the Commission hearing and to the Board of Supervisors for the appeals. Letters are included in Attachments 2-5 of SINA's appeal letter dated September 17, 2020. Neighbors have also provided video clips of noise from practices that document actual noise levels at neighboring homes. In summary, these testimonials provide additional substantial evidence that noise impacts are already significant and would be greatly exacerbated under expanded use of the athletic field.

**Therefore, this analysis finds that there is a reasonable possibility that noise impacts from the proposed Saint Ignatius Project would be significant, unavoidable, and not able to be fully mitigated.**

[16] Exhibit I in https://commissions.sfplanning.org/cpcpackets/2018-012648CUAc1.pdf
[17] https://www.siprep.org/uploaded/Misc/Large_Event_Plan_Writeup_ver2.pdf.

## 2. Traffic, Parking, and Public Safety - There is a Reasonable Possibility that Impacts will be Significant

CHEE conducted an analysis of expected parking and traffic impacts for the Project and it is our opinion that impacts would be significant due to local parking constraints, a lack of parking at the school, and Saint Ignatius' overly optimistic parking and traffic plan. Our analysis and conclusions are discussed below.

### a. Background

The Planning Department did not require a traffic and parking study for the Project. The CEQA exemption determination states that the proposed Project "would shift the existing use to later times in the day and/or days of the week".

However, the Project Sponsors stated in 2018: "We are obtaining a traffic and parking study as part of the Conditional Use Permit process" (CUA Informational and Supplemental Application Packet ,dated September 5, 2018). At the April 29, 2020 remote neighborhood meeting, the school representative stated that they had a "transportation and parking study" and would post it on their Good Neighbor website. No such study was ever provided, and the representative may have been referring to their Night Game and Large Event Management Plan posted on their website[18] or to their Campus Pick-Up and Drop-Off Plan filed as part of the original Project application (dated 10/31/2018)[19].

Saint Ignatius published their Large Event Management Plan in June 2020. It is important to note that the Plan was developed <u>after the Planning Department exempted the Project from CEQA review</u> [emphasis added]. The only traffic-related plan available for the CEQA review was the school's Campus Drop-off and Pick-up Management Plan. The drop-off plan only addresses procedures for students to be dropped off and picked up on 37th Avenue before and after school, including the use of buses to transport students to/from extra-curricular activities including games. There are no provisions in the drop-off plan for managing traffic during large events and night time games, <u>and the CEQA review was flawed in ignoring this important Project aspect</u> [emphasis added].

The Project Sponsors state that Saturday traffic and parking impacts would be reduced, and that weekday evening Project-related traffic "will depart and arrive after commute hour traffic on Sunset Boulevard has subsided" (draft Motion No. 20769, Exhibit I)[20].

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[18] Ibid.
[19] Available on the Accela website for the Project under CEQA documents, no weblink available.
[20] Op. cit. Footnote 17.

**b. Traffic and Parking Analysis**

**As discussed below, our analysis reveals that parking in the neighborhood is already limited and that the school's Large Event Management Plan is fatally flawed.**

Again, it is the Project Sponsors' responsibility to conduct a valid traffic and parking study; however, CHEE has conducted a qualitative desktop analysis to estimate the potential for traffic and parking impacts from the Project. We also peer reviewed the Large Event Management Plan and provide our quantitative and qualitative critique of the plan.

i. Street Parking Analysis

CHEE looked at actual parking levels around the school to estimate the existing and potential new parking impacts from the Project. Google Earth images were analyzed to identify varying levels of on-street parking use depending on school activities. Parked vehicles in the images were counted within the blocks immediately surrounding the school and public properties encompassing, clockwise from the northeast corner - 37th Avenue from Ortega to Rivera Streets, Rivera Street from 37th to 39th Avenues, 39th Avenue from Rivera to Quintara, Quintara between 39th and 41st Streets, 41st Avenue between Quintara and Ortega Streets, and Ortega Street between 41st and 37th Avenues (Figure 1 below).

**Figure 1. Parking Use Evaluation Area**

Four dates were selected from available Google Earth historical imagery to represent different conditions based on apparent field usage, as follows (see Figures 2 – 5 below):

- a pre-COVID school morning with no field activity
- a pre-COVID weekday after school with field activity (assumed to be a practice not a game based on level of activity)
- a Saturday afternoon football game when the public West Sunset playground soccer fields were also in use
- a post-COVID weekday morning

Time of day was estimated from the angle and direction of shadows cast from structures in each image. Trees or shadows precluded an accurate count in some locations on some dates, so those counts were adjusted slightly upward to assume that vehicles were present but not visible. Image quality also varied by date, but the images were zoomed and panned within Google Earth to allow for the most accurate counting possible along each street. Even in the images below, vehicles are clearly visible on surrounding streets. Results of the analysis are summarized in Table 4 and discussed below.

**Figure 2. Pre-COVID School Morning**

**Figure 3. Pre-COVID Afternoon Weekday Practice**

**Figure 4. Post-COVID Weekday Morning**

**Figure 5. Saturday Afternoon Football Game and Public Soccer Field Use**

**Table 4. Estimated On-street Parking Use on Streets Surrounding Saint Ignatius**

| Date | Location | Approximate Vehicle Count |
|---|---|---|
| Monday 9/23/2019<br>10 am<br>pre COVID school day | Rivera between 37th and 39th | 43 |
| | 39th between Rivera and Quintara | 42 |
| | Quintara between 39th and 41st | 14 |
| | Ortega between 37th and 41st | 50 |
| | 37th between Ortega and Rivera | 126 |
| | **Total** | **275** |
| Wednesday 11/2/16<br>5 pm<br>pre-COVID practice | Rivera between 37th and 39th | 33 |
| | 39th between Rivera and Quintara | 28 |
| | Quintara between 39th and 41st | 20 |
| | Ortega between 37th and 41st | 37 |
| | 37th between Ortega and Rivera | 137 |
| | **Total** | **255** |
| Thursday 4/2/2020<br>10 am<br>post-COVID<br>no school activity | Rivera between 37th and 39th | 23 |
| | 39th between Rivera and Quintara | 17 |
| | Quintara between 39th and 41st | 21 |
| | Ortega between 37th and 41st | 27 |
| | 37th between Ortega and Rivera | 12 |
| | **Total** | **100** |
| Saturday 9/11/10<br>2 pm<br>football game day and public field use | Rivera between 38th and 39th | 42 |
| | 39th between Rivera and Quintara | 52 |
| | Quintara between 39th and 41st | 45 |
| | Ortega between 37th and 41st | 56 |
| | 37th between Ortega and Rivera | 149 |
| | **Total** | **344** |

The table shows that on a typical Monday school morning (09/23/2019) approximately 275 parking spaces are in use. This number drops by only 20 vehicles (7%) to 255 vehicles in the afterschool 5 pm period (Wednesday 11/16/ 2016) with a small athletic field practice underway and no apparent use for the public fields or public schools.

This is not surprising considering that Saint Ignatius has 215 staff[21] not all of whom can be accommodated in the school's 65-space parking garage. There are also staff at the two public schools and Saint Ignatius students who park in the neighborhood that would leave at the end of the school day freeing up some parking spots. It is possible that some residents would have returned home by that time and some guests of residents could also arrive by 5 pm and use some of the available spaces. While difficult to discern from the scale of the Figures reproduced herein, the practice day appears to have approximately 22 people on the field (Figure 2).

[21] Op. cit. Footnote 19.

The available post-COVID image from April 2, 2020 taken shortly after the City's Shelter in Place Order took effect. It illustrates parking levels that are likely to be attributable only to local resident use, approximately 100 vehicles. Evening parking levels in a post-COVID world could be slightly higher due to some use by people visiting residents so parking capacity for evening school games would be somewhat less than shown.

After school parking use attributable to Saint Ignatius for a small field practice (11/16/2016) is still more than twice that of local resident parking use levels.

On the Saturday (09/11/2010) football game day with concurrent use at the West Sunset soccer fields, local parking use was 344 vehicles or more than 3 times the resident-only parking level on April 2, 2020. The soccer fields were in full use with perhaps 350 - 400 players and spectators, but the football stadium bleachers were only about half full.

It is important to note that the most recent football game day found on Google Earth was in September 2010 - ten years ago - and it is likely to under-represent more recent general use and football game parking levels. As noted above, the school expects night time football games to have significantly higher attendance levels than Saturday games. Therefore, it is likely that football game attendance, and hence parking pressure, was lower on that date than would be expected currently on a Friday night football game under stadium lights with the expected increase in attendance.

It is also important to note that there are no commercial businesses within these blocks - only residences, Saint Ignatius, two public schools, the West Sunset playground, a small public library, and a small public health center. Therefore, levels of parking activity at any time are unlikely to be attributable to commercial business in the neighborhood.

ii. Large Event Management Plan Summary

The Large Event Management Plan goal is to: "ensure a safe and minimal impact on our Community footprint" related to traffic, parking, security, and trash management for night football games and other large events with anticipated attendance from 1,000 up to 2,800.

The Plan also indicates that the school has only 65 onsite garage parking spaces. However, the it states that 37th Avenue between Ortega and Rivera Streets offers "exclusive use to accommodate capacity events". The school plans to obtain street closure permits for that area from the San Francisco Municipal Transportation Agency. Permits would restrict traffic and parking to event parking only. Additional parking is planned under rental agreements with the San Francisco Unified School District at the AP Giannini Middle School (at Ortega Street between 37th and 39th Avenues) when parking is available [emphasis added], and at the Robert Lewiston Stevenson Elementary School (at 34th Avenue between Pacheco and Quintara Streets). Saint Ignatius also plans to seek permits from the San Francisco Recreation and Parks Department for parking at the West Sunset playground parking lot on Quintara between 39th and 40th Avenues.

Under a street closure permit, the Plan states that 37th Avenue could accommodate up to 300 vehicles in three parking lanes between Pacheco and Rivera Streets, while retaining two

(southbound only) traffic lanes and keeping the intersections open at Pacheco, Quintara, and Rivera Streets. Vehicles would be able to exit those parking spaces into the two separate driving lanes "created by the distances between the three parking lanes".

The Plan also states that street closures would go into effect and vehicles would be "staged" along 37th Avenue between Ortega and Pacheco Streets starting 90 minutes before large games, or by 5:30 pm for a 7 pm game start time (according to the final project proposal)[22]. Vehicles would be directed to proceed south on 37th Avenue from Ortega Street toward Rivera Street and would be parallel parked in the three designated parking lanes from south to north, filling the parking lanes from Rivera back up to Pacheco. Ortega Street would not be used for parking.

iii. Large Event Plan Parking Data Analysis

Google Earth imagery shows at most 83 parking spaces at AP Giannini, although the Plan states that Saint Ignatius would also use the school yard (perhaps their own playing fields) for parking of 250-300 vehicles. There appears to be no off street parking at the Robert Lewis Stevenson Elementary School. We believe Saint Ignatius may have intended to refer to the Sunset Elementary School located next to AP Giannini although there are only 50 spaces there, and there are at most 20 spaces at the West Sunset Playground parking lot.

We analyzed parking capacity on 37th Avenue in the two blocks between Pacheco and Rivera Streets to assess the number of vehicles that could actually be accommodated in that area. The total length of 37th Avenue between Pacheco and Rivera is 1,200 feet, between pedestrian crosswalks on each block. The width of 37th Avenue between Pacheco and Quintara Streets is 45.6 feet, but only 40 feet between Quintara and Rivera[23].

The National Association of City Transportation Officials[24] recommends parking lanes of at least 7 to 9 feet wide, presumably for curbside lanes that allow for passenger side door opening onto a sidewalk.

Vehicle widths range from about 5.9 feet for a smaller vehicle to 6.7 feet for a full-size SUV, excluding side mirrors[25]. For this analysis, side mirrors are conservatively assumed to be 6 inches wide each based on actual measurement of a small car's side mirror (Toyota Corolla).

The two planned curbside parking lanes would then need to be about 8 feet wide to accommodate full-size SUVs and the planned center parking lane would need to be wider, perhaps as much as 13 feet wide, to allow for both side mirrors and for opening doors into the two planned travel lanes. This analysis assumes a minimum 2.5 feet would be needed on each side to allow both the driver and passengers to squeeze out of and later reenter their vehicles. Door opening may not be a concern during the parking phase with no traffic

[22] Op. cit. Footnote 17.
[23] https://striping.sfmta.com/drawings/01_Numbered_Avenue/37th%20Ave/37th%20Ave_Str-8026.1%20(Taraval%20St%20to%20Pacheco%20St).pdf
[24] https://nacto.org/publication/urban-street-design-guide/street-design-elements/lane-width/
[25] https://vehq.com/how-big-is-an-suv/

expected to be passing in the travel lanes, but safe distances for door opening into traffic would be needed as vehicles exit when a game is over, since there is no way for the school to orchestrate vehicle exits in the same manner or in the same order as vehicles had parked. The total width for all three parking lanes would therefore need to be at least 24 feet (ignoring center lane door openings) and most likely up to 29 feet (with allowance for door opening).

The San Francisco Fire Code Section 503.2.1 requires a minimum 20-foot wide unobstructed roadway for emergency vehicles under normal circumstances, a temporary special event street closure permit requires a minimum 14-foot emergency access lane [26].

Even in the best case scenario ignoring door opening allowances, three separate 8-foot wide parking lanes would leave only 21.6 feet between Pacheco and Quintara Streets and only 16 feet between Quintara and Rivera. With a minimum 14-foot travel width of at least one lane for emergency vehicles, two travel lanes cannot be accommodated as only 7.6 feet and 2 feet of width would remain for the second travel lane. Therefore, three separate parking lanes and two travel lanes are simply not possible.

Furthermore, the length of vehicles ranges between 16.0 feet (e.g., a small Honda Accord) to about 18.7 feet (a large Chevy Suburban)[27]. A typical US parallel parking space is 19 feet long plus a 4-foot front/back clearance for entering and exiting the space, or 23 feet total[28]. For the school's large events, vehicles could in theory be parked more closely than that, but since not all vehicles will exit in the order in which they parked, space must be allowed between vehicles. Given the 1,200-foot total length of 37th Avenue within the Plan's two-block parking area, approximately 52 vehicles could be parked in each row.

**c. Discussion**

**The Plan significantly over-estimates the number of vehicles that can accommodated for large football games and events. It also over-estimates the school's ability to adequately control excessive game-related traffic in the residential neighborhood, including during peak traffic times.**

Parking

Since three parking rows are not possible along 37th Avenue, only 104 vehicles could be accommodated in two parking lanes, not the 300 vehicles assumed in three lanes. The Plan does not seem to include a provision for parking vehicles between Ortega and Pacheco but even if that did occur, a maximum of 48 vehicles could be parked in two lanes since that block is slightly shorter, for a total of approximately 152 vehicles parked along 37th Avenue.

The Project Sponsors go so far as to state that "moving activities from Saturdays to Fridays [for football games] has the added benefit of reducing neighborhood weekend traffic as weekend crowds at West Sunset soccer fields can be quite large". We note that the public

[26] https://www.sfmta.com/sites/default/files/reports-and-documents/2017/11/specialevents_factsheet-1117_0.pdf
[27] Op. cit. Footnote 25.
[28] https://www.dimensions.com/element/parallel-parking-spaces-layouts

soccer field usage is not nearly as large as what would be expected for football games or other school events with attendance from 1,000 and up to 2,800. Further, while Saturday parking pressures may be reduced by moving large games to Friday nights, the school has not provided any data to quantify that benefit, nor have they provided any data on the number of vehicles expected for football games. Therefore, it is impossible to know what the true expected impact would be without a valid and robust traffic and parking study.

People are most likely to park as close to the stadium entrances as possible. Once the limited parking on 37th Avenue is full vehicles would search for and fill any available public parking spaces along Rivera Street and 39th Avenue first, then would search for and fill spaces on the streets that are slightly farther away. This will lead to potentially significant parking impacts throughout the neighborhood.

Traffic

The Plan calls for street closures and vehicle staging beginning 90 minutes prior to the 7 pm game start. Closures that begin at 5:30 pm on a Friday afternoon will coincide with the evening peak commuting time and adversely impact the non-game related normal traffic flow on the streets around the closed street and intersections. It is likely that traffic backups will occur at the intersections and potential safety issues will result as vehicles enter from Sunset Boulevard for staging on Ortega Street. Non-game driver confusion at the closed street and intersections will lead to increased traffic congestion in the surrounding neighborhoods and could create additional safety concerns as drivers search for alternate routes around the closures.

Neighbors have reported traffic congestion in the past, without the added traffic due to large games. At a July 7, 2020 remote meeting of representatives from the school and SINA that CHEE staff also attended, a neighbor noted: “There are often traffic conflicts at Sunset and Ortega, there have always been back ups there”. The school’s response was: “Yes, that is a perennial concern”. Yet there is no provision in the Large Event Plan to mitigate this concern.

Public Safety

The Plan indicates that 3 police officers and 10 security personnel will control traffic and parking but there are no specified qualifications for the non-police security personnel. It is common to see the effects of non-police traffic controllers that are poorly trained and unqualified at many road construction sites – they can greatly exacerbate traffic issues and create confusion and public safety concerns for drivers and workers alike by their lack of situational awareness, lack of understanding of basic traffic hand signals, and the resulting mis-communication with drivers.

San Francisco has a job description for a Parking Control Officer[29] which includes, among other tasks:

[29] https://www.jobapscloud.com/SF/specs/classspecdisplay.asp?ClassNumber=8214

- Direct vehicular and pedestrian traffic by using appropriate hand signals and whistle at a specific intersection or other control points
- Assists pedestrians in crossing from curb to curb at intersections
- Directs traffic at the perimeters of critical incidents, parades, and other public functions.
- Operates and monitors a 2-way radio to keep in contact with supervisors/managers
- Responds to complaints from the public and from departmental dispatchers
- Inform departmental supervisors and dispatch centers of any circumstances requiring police or emergency assistance

Qualifications include, among others:

- Ability to problem solve, accurately analyze situations, and take an effective course of action
- Communicate orally in a clear and effective manner to the general public, supervisors/managers, and other city departmental staff
- Tactfully, professionally, and effectively interact with parking violators, the general public, and other city departmental personnel
- Work independently with minimal supervision and under stressful and hostile conditions

Experience and training requirements (with some substitution allowed for directly related education) are:

- Two years of satisfactory public contact experience which must have included providing and/or verifying information on laws, rules, regulations, and procedures, or responding to client or customer complaints as a primary responsibility; or
- Successful completion of two (2) years military service either on active or reserve duty; or
- Six months of satisfactory experience as a class 8214 Parking Control Officer.

To ensure public safety, Saint Ignatius would need to carefully vet all outside security personnel applicants and ensure that they are fully qualified to manage the traffic and parking related to the large events. The Plan should include provisions for security pre-qualification, direct supervision, and prompt removal of underperforming individuals to ensure public safety and appropriately manage traffic inflow and outflow.

### d. Traffic and Parking Impact Conclusions

The CEQA exemption determination states that the Project does not propose additional parking. Given the school's own very limited parking, this is a gross oversight. Furthermore, the Commission Motion states that night time stadium use is not expected to adversely impact traffic and parking in the neighborhood. The Planning Department apparently relies upon the school's Large Event Management Plan and/or the Campus Drop-off and Pick up Plan as a means to ensure that impacts are managed, implying that there are, in fact, adverse impacts needing mitigation under the Plan. Yet, CEQA requires that the

effectiveness of mitigation measures be evaluated in a CEQA review process, not as part of an exemption determination.

The analysis above shows that even non-game parking is currently affected by school activities and would be greatly exacerbated by large Friday night football games; that the Plan greatly overestimates the amount of parking made available by street closures; and that the Plan itself is highly questionable in terms of the school's ability to control traffic and parking for these events in a way that protects public safety and ensures parking availability for residents.

Neighbors have repeatedly reported their concerns and complaints about parking, traffic, and public safety from day time practices and games, as well as from night time games that took place under temporary rented lights (see CEQA appeal filing, August 24, 2020). The complaints date back to 2015 when the Project was first proposed in letters to then Supervisor Katy Tang, and more recently in testimonial letters to the Planning Commission for the Commission hearing and to the Board of Supervisors for the appeals. Letters are included in Attachments 2 – 5 of SINA's appeal letter dated September 17, 2020. In summary, these testimonials provide additional substantial evidence that these impacts are already significant and would be greatly exacerbated under expanded use of the athletic field.

**Therefore, this analysis finds that there is a reasonable possibility that traffic and parking impacts from the proposed Saint Ignatius Project are likely be significant, unavoidable, and not able to be fully mitigated.**

## 3. Sensitive Species - There is a Reasonable Possibility that Impacts will be Significant

CHEE has reviewed information on the potential impacts of the stadium lighting Project on sensitive wildlife species, and it is our opinion that impacts from the Project's lighting and noise levels could be significant. The Planning Department completely ignored these potential impacts as part of the Project's categorical exemption, but these potential impacts are important and need to be considered and evaluated under a CEQA review.

### a. Background

The Project application ignores potential impacts to sensitive species although the 2015 Project Review Meeting submittal (2015-014427PRV) notes that Saint Ignatius is located within 300 feet of a possible urban bird refuge corridor along Sunset Boulevard[30].

The CEQA exemption determination is silent on sensitive species and the Planning Department's own Environmental Evaluation Screening Form used for project applications does not consider sensitive species at all, and only addresses tree removals or additions in the Biological Resources section. As if there are no concerns for wildlife within the City limits.

[30] https://sfplanning.org/sites/default/files/resources/2018-08/Urban%20Bird%20Refuge.pdf

However, Appendix G of the CEQA Guidelines[31] provides a CEQA checklist form which specifically includes consideration of project impacts on sensitive species including habitat modifications, interference with the movement of native or migratory species, or alteration of their movement corridors.

As with noise and traffic/parking it is the Project Sponsor's responsibility to evaluate these impacts. SINA submitted a summary of publicly available information on species that are documented or likely to be present in the immediate vicinity of Saint Ignatius, in order to point out the potential for Project impacts on them[32]. The following discussion expands upon and adds context and definition to that information.

### b. Data Sources

Species information for this review was obtained from several sources as noted in SINA's prior submittal. Numerous rare, threatened or endangered species are or may be present at or near the Project site.

- The US Fish and Wildlife Service's Information for Planning and Consultation (IPaC) online mapping system[33]. It provides information on the known or expected ranges of threatened and endangered species protected under the federal Endangered Species Act, and migratory birds protected under the federal Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act. SINA conducted an online data check on July 20, 2020. The federally-listed wildlife species that could be present and thus affected by activities in the 98-acre area surrounding the school and bounded by Ortega and Santiago Streets, and 36th and 41st Avenues include:
    - two mammals
    - six birds
    - two reptiles
    - one amphibian
    - five butterflies

  Some of the identified federally-listed species are also California state-listed species under the California Endangered Species Act[34]. These include four bird species and the San Francisco garter snake. Other state-listed species that are not also federally-listed may be present in the immediate school vicinity. Species information is not publicly available from the state's natural diversity database, and therefore not included in this analysis.

[31] California Code of Regulations Title 14, Division 6, Chapter 3, Appendix G. https://govt.westlaw.com/calregs/Document/I9D1077043F694621BD0D17A6E0616567?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)
[32] Op. cit. Footnote 3, Appendices B and C.
[33] https://ecos.fws.gov/ipac/
[34] https://wildlife.ca.gov/conservation/cesa

- The IPaC report also lists 24 species of migratory birds that could be present at certain times of the year. The list includes the state-endangered bald eagle and the state-threatened tricolored blackbird.
- The nationwide eBird website[35] compiles bird observation data and lists over 67 species of more common birds observed since 2015 at the West Sunset Playground, adjacent to Saint Ignatius.
- There are also 16 bat species reported within the Bay area[36] and at least four species within the City[37].
- Neighbor reports of nesting red tail hawks commonly seen in the trees by the Community Garden located just north of the school property. Owls have also been seen there. Neighbors also report killdeer grazing and eating bugs off the natural grass soccer fields and baseball field adjacent to the athletic field. Western snowy plovers, a federally threatened species, have also been observed nesting on flat roofs of some homes on 39th Avenue and in the surrounding neighborhood.

### c. Discussion

The high-intensity LED lighting specified for the Project brings adverse human and wildlife health effects that have not been addressed. The CEQA appeal supplement letter from Kera Lagios (dated September 11, 2020 and filed September 17, 2020), SINA's lighting expert, discusses the effects of light and the blue-ish light from LEDs in particular, on the circadian system of living organisms. She states: "Fundamentally, darkness is important because human beings, animals and plants have evolved biologically to take cues from the daily cycles of light and dark".

It has also been demonstrated that excess noise has adverse effects on wildlife. The increase in the Project's evening noise levels discussed in Section 1 above will occur virtually every evening of the week during the fall, winter and early spring which could have a significant impact on wildlife.

Extensive peer-reviewed literature is available [38, 39, 40, 41, 42, 43] that documents the adverse effects of excess light on wildlife, including:

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[35] https://ebird.org/hotspot/L6317907?yr=all&m=
[36] https://baynature.org/article/where-are-there-bats-in-the-bay-area/
[37] https://www.krauel.com/publications/Krauel2016plosone.pdf
[38] For instance, the Journal of Experimental Zoology Part A devoted an entire issue to Artificial Light at Night as an Environmental Pollutant. Volume 329 Issue 8-9, October/November 1, 2018. https://onlinelibrary.wiley.com/toc/24715646/2018/329/8-9
[39] https://www.researchgate.net/publication/272889669_Impacts_of_artificial_lighting_on_bats_A_review_of_challenges_and_solutions
[40] https://www.researchgate.net/profile/Michael_Salmon3/publication/235602286_Perry_G_B_W_Buchanan_R_Fisher_M_Salmon_and_S_Wise_2008_Effects_of_night_lighting_on_urban_reptiles_and_amphibians_Chapter_16_in_Urban_Herpetology_Ecology_Conservation_and_Management_of_Amphibians_and_/links/57486e6108aeae389f4e1792.pdf
[41] https://www.nature.com/articles/s41598-018-21577-6
[42] http://soundandlightecologyteam.colostate.edu/pdf/biologicalconservation2020.pdf
[43] http://soundandlightecologyteam.colostate.edu/pdf/insects2018.pdf

- Disruption of the nocturnal environment
- Attraction of sea birds and migratory birds to bright lights
- Alterations in amphibian, reptile, insect and pollinator behaviors
- Reproductive changes in many species
- Reduction in foraging and roosting behavior of bats

In addition, noise has adverse effects on wildlife. The National Park Service states: "Sound, just like the availability of nesting materials or food sources, plays an important role in the ecosystem. Activities such as finding desirable habitat and mates, avoiding predators, protecting young, and establishing territories are all dependent on the acoustical environment"[44]. Many studies indicate that animals, like humans, are stressed by noisy environments.

Shannon et al. 2015[45] conducted a systematic and standardized review of the 242 scientific studies published from 1990 to 2013 dealing with the effects of anthropogenic noise on wildlife. The majority of those studies documented effects of noise including:

- Altered vocal behavior
- Reduced species abundance in noisy habitats
- Altered predator-prey interactions due to inability to hear cues
- Changes in foraging behavior
- Impacts on individual fitness and the overall structure of ecological communities

That literature review showed that terrestrial wildlife responses begin at noise levels of approximately 40 dBA, and 20% of studies documented impacts below 50 dBA. Overall, 88% of reviewed studies reported a statistically measured biological response to noise exposure. For birds, changes in song characteristics, reproduction, abundance, stress hormone levels and species richness were documented at noise levels at or above 45 dBA. Terrestrial mammals showed increased stress levels and decreased reproduction at noise levels at or above 52 dBA.

The frequency and intensity of noise are also factors in wildlife responses to noise. Shannon et al. 2015 states: "Evidence suggests that the characteristics of the acoustic signal (e.g., frequency, duration, onset, intensity) and the biology of the species in question (e.g., hearing range, behavioral state, habitat, vocal behaviors) are important for predicting how noise is likely to affect a particular organism".[46]

### d. Sensitive Species Impact Conclusions

It is highly likely that the new high-intensity stadium lighting and nighttime noise levels would adversely impact at least some sensitive species that are dependent upon darkness and/or quiet for foraging, roosting and nesting, and migration. A full CEQA review would

[44] https://www.nps.gov/subjects/sound/effects_wildlife.htm
[45] Available for purchase from https://onlinelibrary.wiley.com/doi/abs/10.1111/brv.12207
[46] Ibid. at p. 988.

typically trigger endangered species consultation with the US Fish and Wildlife Service and California Department of Fish and Wildlife since such species are known or likely to be present (as discussed above).

Since the Planning Department exempted the Project from CEQA this consultation has not occurred and there is no information upon which to dismiss potential impacts on sensitive species. The presence of sensitive species must be investigated and potential adverse impacts of the stadium lighting project on them must be evaluated and mitigated to the extent possible.

The Planning Department must also support the City's Biodiversity Program and Biodiversity Policy (Board of Supervisors Resolution 107-18)[47] by providing robust oversight on projects that could imperil biodiversity. The Policy states: "In San Francisco, 95% of our land area is developed and its remaining natural heritage, including a dozen distinct ecological communities and several endangered species, is in a precarious state. From the Pacific Ocean to the Bay, the City is a unique natural environment worth protecting. The Planning Department has an important role (independently and in collaboration with our fellow City agencies) to help San Francisco be a sustainable and healthy city for all its inhabitants; human, animal, and plant."

**This analysis finds that there is a reasonable possibility that impacts on sensitive species from the proposed Saint Ignatius Project are likely be significant, unavoidable, and unable to be fully mitigated.**

After our in-depth review of available information and the analyses summarized above, it is my professional opinion that the Saint Ignatius Stadium Lighting Project has a reasonable potential to create significant adverse impacts on ambient evening noise levels in the neighborhood; to create significant traffic and parking problems throughout the neighborhood; and to adversely impact sensitive wildlife species due to both the lighting and noise.

Use of the athletic field would be expanded to 150 nights per year, or nearly every evening during the fall, winter and spring months with shorter daylight hours. The environmental impacts of this high level of new use have not been adequately evaluated. Therefore, we find that the Project should not have been categorically exempted from CEQA review and should be subject to a full CEQA review including preparation of a full Environmental Impact Report.

Sincerely,

Maryalice Fischer
Executive Director, CHEE LLC

Attachment 1. Abbreviated list of related CHEE projects

[47] https://sfgov.legistar.com/View.ashx?M=F&ID=6221173&GUID=F6DFAFED-8F3E-4615-AE74-86FA078A97EC

**Attachment 1**

**Abbreviated list of projects relevant to this CEQA appeal that were completed by CHEE, or independently by CHEE staff**

National Environmental Policy Act (NEPA)

- Conducted peer reviews and/or adequacy assessments of NEPA Environmental Impact Statements and Environmental Impact Reports prepared by others for over 70 development projects in 15 states.

Sensitive Species Assessment, Impact Analysis, and Mitigation

- Evaluated project compliance with the Endangered Species Act (ESA) and state-level ESA programs for over 100 sites in 25 states, as part of regulatory reviews and/or environmental compliance audits of federal installations and for private development projects.
- Rare, Threatened and Endangered Species Study. TransCanada. Coordinated multi-year studies to identify sensitive plant and wildlife species in 120 linear miles of habitat in two states. Managed teams of biologists in study design, procurement of species scientific collection permits, comprehensive field surveys, GIS-based habitat mapping, data analysis, and reporting.
- Tuberclid Orchid Recovery and Mitigation Program. US Generating Company (then a subsidiary of Pacific Gas & Electric Company). Managed five-year program to relocate and monitor state-endangered plant species to avoid adverse effects from development proposal.
- Natural Resources Inventory, Barrington NH, Strafford Regional Planning Commission. Completed municipal natural resources inventory report including GIS-based assessments and summary of the natural resource basis as part of the municipal Master Plan.

Traffic and Parking

- Recreation Area Planning, US Generating Company (then a subsidiary of Pacific Gas & Electric Company). Developed and coordinated implementation of 10-year comprehensive plan to improve and expand 17 public access recreation areas in two states. The project included evaluation of pre-existing traffic patterns and development of site-specific traffic improvements; coordination with state and local transportation departments to ensure that measures met applicable standards; evaluated parking needs and improvements to parking facilities; obtained federal, state and local permits for all ground-disturbing activities; conducted construction monitoring and oversight and post-construction maintenance and reporting on efficacy of the improvements. Other aspects of the project including aesthetic improvements and mitigation, and threatened and endangered species surveys and protection measures.
- Comprehensive Recreation Facility Needs Assessment. TransCanada. Managed multi-year study to assess recreation area adequacy and identify improvement needs at 48 public access recreation areas. Assessments including traffic counts, visitor surveys, parking and traffic flow evaluations, and development of a 370-page report detailing findings with recommendations for traffic, parking, and other recreation area improvements.

**Attachment 1**

**Abbreviated list of projects relevant to this CEQA appeal that were completed by CHEE, or independently by CHEE staff**

- Northwood Meadows State Park Discovery Day, NH Department of Parks and Recreation and Northwood Area Land Management Collaborative. Large event organization and management. Developed and implemented state-approved large event management plan. conducted traffic flow analysis; designed patterns for safe traffic flow, ingress and egress, and parking utilization; coordinated with state and local police and EMS agencies to ensure public safety and ease of access for emergency personnel and event attendees; and managed security team to ensure that traffic and parking requirements were enforced.
- Utility Traffic Control Program, Granite State Electric Company. Developed traffic control strategies for roadside construction projects. Developed written program for traffic control, trained utility workers in proper traffic control methods including situational awareness, hand signaling to workers and drivers, warning sign placement, and coordination with police during construction activities.
- Public Transit Human Services Transportation Plan. Alliance for Community Transportation and Rockingham and Strafford Metropolitan Planning Organizations. Facilitated the efforts of transportation providers in a 38-town region to coordinate public transit service as part of the region's Long Range Transportation Plan. Developed federally-compliant implementation plan; identified transportation needs of individuals with disabilities, older adults, and individuals with limited income; assessed available services and any gaps in service; and developed strategies for meeting those needs and prioritizing services throughout the region.

<u>Noise</u>

- Industrial Hygiene Hearing Conservation Program, New England Power Company: Developed and implemented corporate hearing conservation program. Conducted occupational exposure noise monitoring, determined noise thresholds requiring hearing protection, instituted audiometric testing program for workers, provided hearing conservation training program, and maintained records of noise levels and audiometric testing results.
- Large Event Noise Level Management and Control, various clients. Measured amplified sound levels; monitored compliance with applicable noise standards; and conducted continual active sound level control to remain within applicable standards at large indoor and multi-day outdoor venues, including among others:
    - Hampton Beach NH Seafood Festival
    - Salem MA Seafood Festival
    - South Berwick ME Strawberry Festival
    - Bentley's, Arundel ME
    - Lobster in the Rough, York ME

Kera Lagios, LEED AP, Assoc. IALD
2020-09-11

# St. Ignatius Sports Lighting Proposal
# Evaluation of Lighting Impacts

To Whom it May Concern:

My name is Kera Lagios. I am currently the Principal of Atelier Fos, a lighting consultancy and prior to that I was a Principal of Lighting Design at Integral Group in Oakland, CA. I have over 10 years experience designing the lighting for buildings, landscapes and streets, including senior, affordable, and market rate residential projects, transit plazas, airports, schools, universities, and commercial buildings. A large percentage of my work incorporates LEED Platinum and Gold certified and Net Zero projects, and I have practiced in Northern California for 5 years. My education includes a Masters of Architecture from the Harvard University Graduate School of Design. I have won several awards for lighting and daylighting, currently serve as a LEEDUser Expert for the LEED Interior Lighting Credit, and am a LEED Accredited Professional as well as an Associate Member of the International Association of Lighting Designers.

I have conducted an evaluation of the Saint Ignatius Lighting Installation Proposal and provided my analysis in the report below. Please feel free to contact me with any questions. My contact information can be found at the end of the document.

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# 1. Introduction

It is important to understand that amid benefits to the school and its athletes, the proposal by St. Ignatius Preparatory School to install new, permanent lights for their sports field will have significant adverse effects on the residents of the Sunset Neighborhood. Not only is the school proposing a dramatic increase in the quantity of light installed, but they are also proposing a dramatic increase in the hours and days when these lights will be used.

While it is true that LED technology has improved control and efficiency of lighting installations, it is false to say that this installation will have no negative impacts on the neighborhood.

There are significant ways in which the project is overlit and additional steps must be taken by the school to provide alternative options for the installation in order to mitigate the dramatic and negative impact on the nighttime environment for the residents of the Sunset neighborhood.

The following report is my assessment of the lighting aspects of the project based on the materials presented by Musco.

## 1.1 Impacts of Outdoor Lighting

Outdoor lighting provides many benefits to our cities and neighborhoods, but it can also be detrimental. Lighting enables an extension of the use of outdoor spaces beyond daylight hours, helps promote the feeling of safety and security, is used for signage and wayfinding, and can provide beautiful accents for buildings and landscaping.

Unfortunately, outdoor lighting also has drawbacks. These include l**ight pollution, light trespass, glare, excess energy use, degradation of aesthetics, and it may harm human, animal and plant health**. Because of this, it is important to weigh the benefits and costs whenever planning new lighting installations. In addition to considering those who will benefit from the lighting, it is essential to consider the people and environments beyond the property line, to evaluate the impacts, and work together to investigate alternatives that may limit the negative impacts.

### Why is darkness important?

Despite the advancements in LED technology, our nights are getting brighter, and in fact, it may be the energy efficiency and cost effectiveness of LEDs that are causing more outdoor lighting to be installed.[1] According to the Illuminating Engineering Society (IES), “The duration of lighting has increased; in some areas there is never any real darkness, which might have a profound impact on natural cycles.”[2]

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[1] Kyba, Christopher, C.M. “Artificially lit surface of Earth at night increasing in radiance and extent.” Science Advances 22 Nov 2017: Vol. 3, no. 11, e1701528.
[2] IES RP-33-14, *Lighting for Exterior Environments*, 2014, p. 1.

Fundamentally, darkness is important because human beings, animals and plants have **evolved biologically to take cues from the daily cycles of light and dark**, and our ability to see evolved over millions of years of relative nighttime darkness[3]

Brighter nighttime environments are a shift from that evolutionary condition, and pose potential problems to our environment and potentially our health. Just as we are concerned about the effects of polluted air and water on our environment and ourselves, the concerns about excessive light at night must be taken seriously.

### 1.1.1 Light and health

Development in research on the effects of light on human health have increased dramatically over the past few decades and have accelerated quickly in the most recent few years. We now know that **our eyes have two functions: to help us see and to regulate our circadian system**. In turn our circadian system functions like a clock.

#### *Vision versus the circadian system*

The circadian system differs from the visual system. While the visual ("photopic") system which functions during daylight, is most sensitive to green light. The melanopic" system which governs circadian response, is **more sensitive to light in the blue part (480nm) of the visual spectrum** (Table 1 and Figure 1).

**Table 1. Comparison of visual system and circadian system**

| | Visual system | Circadian System |
|---|---|---|
| **Visual response** | photopic or scotopic | melanopic |
| **Peak sensitivity** | ~555nm (green) or ~505nm (blue-green) | ~480nm (blue) |
| **Cells in eye** | rods and cones | ganglion cells |

#### *Circadian regulation*

The circadian clock does not regulate itself. It must be reset on a daily basis, and the resetting is done by the natural 24-hour light-dark cycle. Blue-enriched light is one of the factors that suppresses melatonin and cues the reset of the circadian clock each morning. Not enough in the morning may make us drowsy, and too much after dark may keep us awake.

Although much of the attention given to light and health focuses on blue-enriched lighting, it is important to note that the circadian response to light is governed by several factors, of which

[3] IES TM-18-18, *Light and Human Health*, 2018, p. 9.

***spectrum*** is one. In fact, "Multiple optical radiation characteristics (**quantity, spectrum, timing, duration, pattern and prior optical radiation exposure**) all affect the magnitude of the phase-resetting response."[4]

### *What does the circadian clock do?*

The regulation of the circadian clock has been tied to a number of neurobehavioral responses and linked to clocks in the liver and the lungs. Processes include regulation of metabolism, wound healing, mood, reproductive processes and more. According to the IES:

"In mammals, a wide variety of physiological and behavioral events exhibit circadian rhythmicity, ranging from the obvious sleep-wake cycle, to more covert changes in hormone levels, core body temperature, blood pressure and gene expression."[5]

In general, light and darkness are important to our health for the following reasons:

- General exposure to nuisance overlighting and glare can result in discomfort and disrupt sleep, both which affects health and wellbeing in their own right.
- Blue-light at night is particularly problematic because the circadian system is most sensitive to light in the "blue" range of the visible spectrum. "Cooler" color temperatures, such as the 5700K LEDs used in the SI project, are more likely to trigger a circadian response. (See Section 1.2 for discussion of color temperatures).
- Currently there are no defined thresholds for exposure to light at night in terms of the effects on the circadian system, and the IES's position is that normal exposure to light at night is not life-threatening.[6] Although we still don't know the exact thresholds at which the circadian cycle can be disrupted by light at night, there is evidence that even low levels might be capable of triggering a response.[7]

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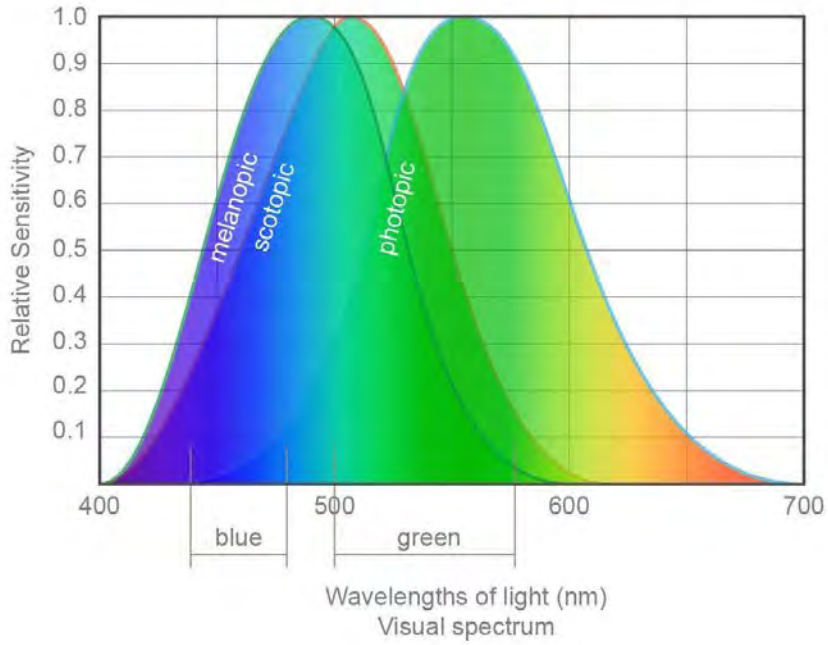
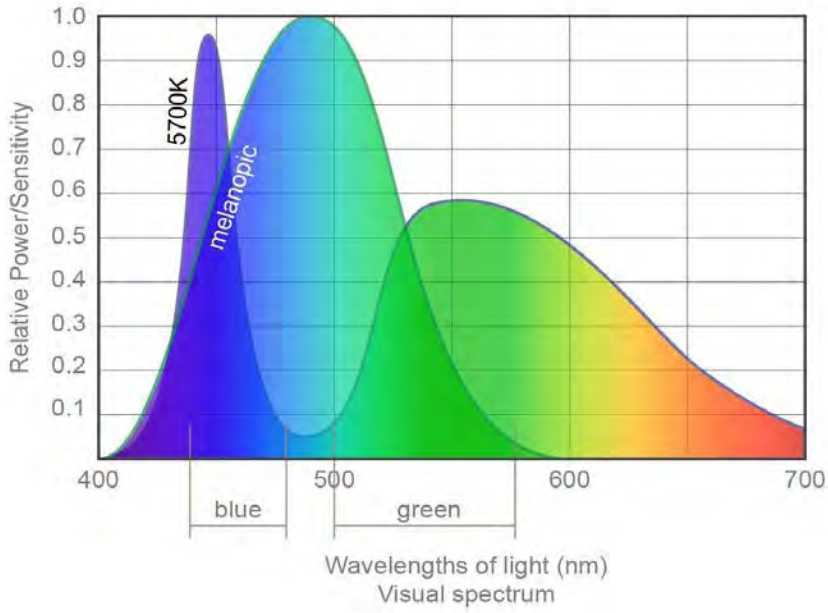
[4] "Multiple optical radiation characteristics (quantity, spectrum, timing, duration, pattern and prior optical radiation exposure) all affect the magnitude of the phase-resetting response.", IES TM-18-18, p. 10.
[5] IES TM-18-18, p.11.
[6] IES RP-33-14, p.4
[7] IES TM-18-18, p. 14-15.

**Figure 1. Peak sensitivity to different wavelengths of light**




*Top: Graph showing the visual (photopic (day)and scotopic (night)) and circadian (melanopic) peak sensitivity curves overlaid with the colors of the visual spectrum (nm). The circadian system is most sensitive around 480nm (blue light), whereas the visual (photopic) system is most sensitive around 555nm (green light).*

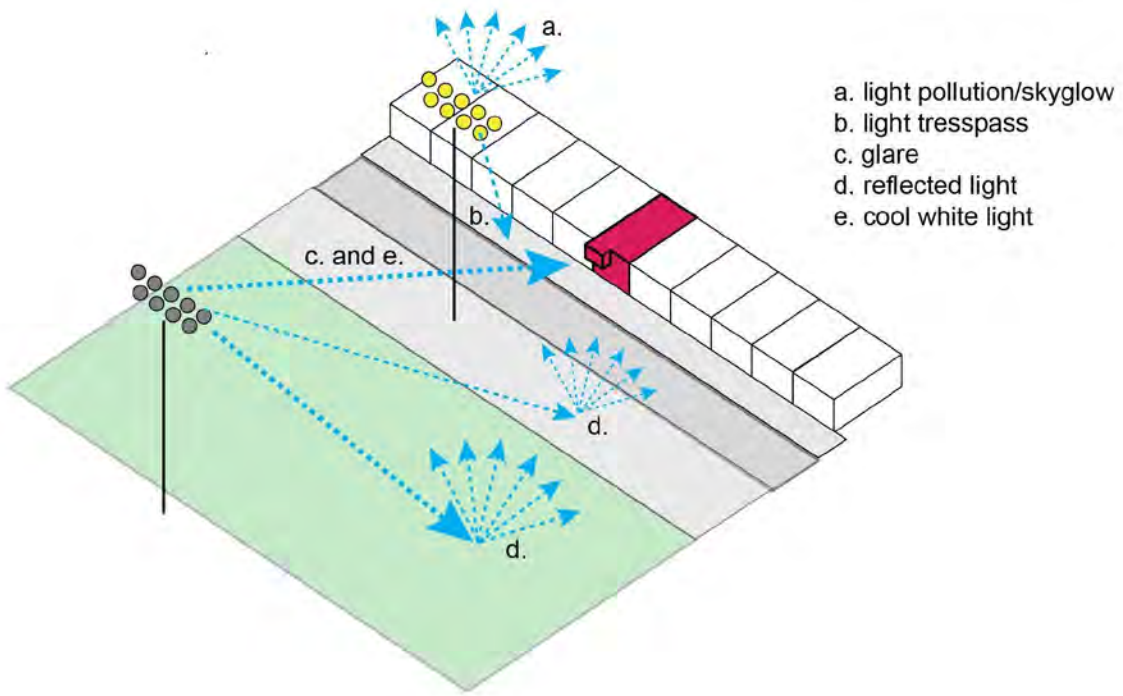
*Bottom: The melanopic response corresponds closely with the blue-enriched light present in 5700K light sources, meaning that cooler color temperatures are more likely to trigger the melanopic response.*

*Diagrams by author, based on: https://www.ies.org/fires/simplifying-melanopsin-metrology/*

### 1.1.2 Other impacts of outdoor lighting

There are three aspects of outdoor lighting that are most often used to evaluate the impacts of an installation on the nearby environment: light pollution, light trespass and glare.

**Figure 2. Outdoor lighting aspects of importance**




***Light pollution*** is defined by the IES as, "**the combination of all the adverse or obtrusive effects of electric light that produces sky glow**."[8]

Light pollution is caused by light that shines upward to the night sky, and is exacerbated as that light reflects off of particles in the air. While light pollution typically is measured as uplight from a luminaire, light from downward pointed luminaires that reflects off of buildings and roads also contributes to sky glow.

Light pollution is important because it:

- is not local. For even small cities, it can be viewed from miles away.
- reduces the darkness of our nighttime environments (see below for more discussion) which carries with it environmental and aesthetic degradation
- obscures the view of the stars and the Milky Way
- negatively impacts reproduction, feeding and habitation of plants and animals

[8] IES RP-33-14, p. 21.

*Measurement*:

Typically ,light pollution is measured according to how much light from a luminaire or project is emitted upwards, or above horizontal.

***Light trespass***, **"relates to light that is obtrusive off-site."**[9] This metric evaluates light that falls outside the project boundary or property line.

Light trespass is important because:

- It is typically an eyesore and a nuisance for neighbors
- It is "wasted light" and energy inefficient

*Measurement*:

Typically light trespass is measured as the amount of light falling on a plane that extends vertically from the property line upwards.

**Figure 3. Light Trespass**

These two photos were taken at the same facility, on opposite sides of the access road. (Left) Pointed toward the athletic field. (Right) Pointed toward the neighborhood.

*Image Source: IDA-Criteria for Community-Friendly Outdoor Sports Lighting v1.0, November 28, 2018*

**Glare** is, "the sensation produced by luminance within the visual field that is sufficiently greater than the luminance to which the eye is adapted causing annoyance, discomfort or the loss of visual performance and visibility."[10] The IES breaks glare down into two significant categories: **disability glare** and **discomfort glare**.

[9] IES RP-33-14, p. 22.
[10] IES RP-33-14, p.53

Glare is problematic because:

- Glare from bright sources can make objects in the foreground harder to see
- Glare is a particular problem for seniors. According to the IES, "the loss of lenticular transparency scatters light and reduces the apparent contrast between objects," and, "is known as disability glare."[11]
- Obtrusive lighting can be an eye-sore. "Non shielded outdoor lighting can be observed at great distances; nighttime visual clutter can be aesthetically disruptive".[12]

*Measurement:*

Glare is one of the most complicated metrics and is currently evaluated in many different ways. In general, the various equations that define glare, all incorporate four factors: **luminance of glare source, size of glare source, scene luminance and position** (see Equation 1.0 below). Various standards use varying methods for characterizing glare. (For more discussion on glare, see Section 2.3).

**Equation 1.0. Glare calculation**

Luminance of Glare Source

Size of Glare Source

$$Glare = \sum_{i=1}^{n} \frac{L_{si}^{\exp} \omega_{si}}{L_b^{\exp} P_i^{\exp}}$$

Scene Luminance

Position Index

*Source: Jakubiec, Alstan and Christoph Reinhart, "The Use of Glare Metrics in the Design of Daylit Spaces: Recommendations for Practice", 9th International Radiance Workshop; September 20-21, 2010.*

### *Energy use and Aesthetics*

Energy use and aesthetics are both side-effects of outdoor lighting. These factors do not have their own associated metrics.

[11] IES RP-28-07 *Lighting and the visual environment for senior living*, 2007, p.1

[12] IES RP-33-14, p.1

## 1.2 How is outdoor lighting governed?

Outdoor lighting in the United States, generally, does not have any hard and fast requirements for design. Municipalities can elect to adopt certain standards or implement their own, but more often, outdoor lighting is based on its context and some degree of interpretation.

### 1.2.1 Guiding standards

There are several organizations that publish lighting standards that can be used to design and evaluate lighting. The major entities are the Illuminating Engineering Society (IES) and the International Commission on Illumination (CIE). Both publish recommendations, often on the same topics, however, it should be noted that the IES, sometimes referred to the IESNA (Illuminating Engineering Society of North America) predominates in the United States. The standards, technical manuals and recommended practices produced by the IES and CIE are developed by committees consisting of experts in the field. They provide guidance for target light levels and limits for metrics like light trespass. Exceeding these limits will result in over-lighting, energy misuse, unwanted light, potentially significant adverse aesthetic impacts and a substantial percentage of affected persons finding the visibility unacceptable.

In addition, other organizations like LEED and the IDA (International Dark-Sky Association) have published information which sets targets for certain aspects of outdoor lighting. Of these, the relevant publications are:

- IES RP-33-14 Lighting for Exterior Environments, 2014
- CIE 150 2017 Guide on the limitation of the effects of obtrusive light from outdoor lighting installations, Second Edition, 2017
- LEED v4.1 Light Pollution Reduction Credit
- IDA Criteria for Community-Friendly Outdoor Sports Lighting v1.0, November 28, 2018
- Joint IDA-IES Model Lighting Ordinance, 2011
- California Energy Commission TITLE 24, PART 6, AND ASSOCIATED ADMINISTRATIVE REGULATIONS IN PART 1, Section 130.2 Outdoor Lighting Controls and Equipment
- California Green Buildings Standards Code, Title 24, Part 11 5.106.8

In addition, there are two additional relevant references:

- IES RP-6-1 Sports Lighting, 2015
- IES TM 18-18 Light and Human Health, 2018

## 1.3 How is lighting measured?

While we are all familiar with lighting in many ways, many of us are not familiar with the technical ways in which lighting is characterized, particularly outdoors.

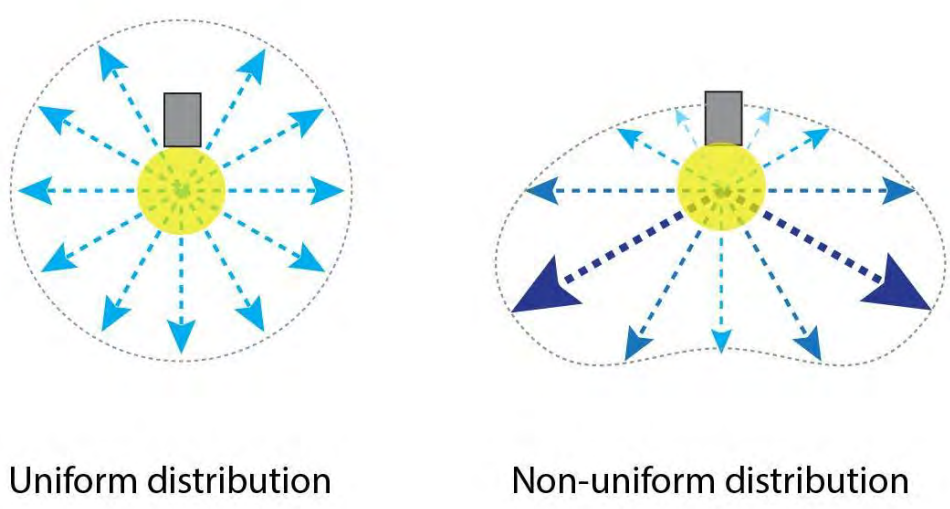
### Lighting Zones and the MLO

Because outdoor areas range from nature reserves to places like Times Square, it is first important to characterize the zone in which a project is located. The IES and the IDA developed the "Model Lighting Ordinance" which classifies outdoor nighttime environments into lighting zones 0-4, with LZ0 being a location in which describes the darkest environments (nature preserve), and LZ4 beings the most intensive use of lighting (e.g. Times Square) (see Appendix 1). Once a zone is established for a project, recommendations for appropriate light levels follow from there. Note: the CIE uses a similar, but slightly different classification system, and California's Title 24 previously used a system with 4 zones, however it has now accepted the MLO classification system.

### Candelas (cd)

Candelas are defined as "the SI unit of luminous intensity. One candela is the luminous intensity [emitted by a light source (e.g. fixture, bulb, lamp)], in a given direction."[13] If the light distribution is uniform, the same candela distribution will be emitted in all directions. If the light distribution is non-uniform, the candelas in each direction will vary. See Figure 4 below for illustration.

**Figure 4. Light Distribution**




[13] Oxford Languages Search for: definition of "candela", "Google English Dictionary", 2020 Oxford University Press.

*Illustration of candelas for uniform and non-uniform distribution light sources*

**Illuminance (footcandles(fc) or lux(lx))**

Illuminance is the quantity of light falling on a surface. Illuminance varies with angle and distance of the receiving surface. In Figure 5 below, the light source is uniform and emits the same candelas in each direction, however, the illuminance will vary (a v. b) depending on where the light is measured.

**Figure 5. Illuminance**

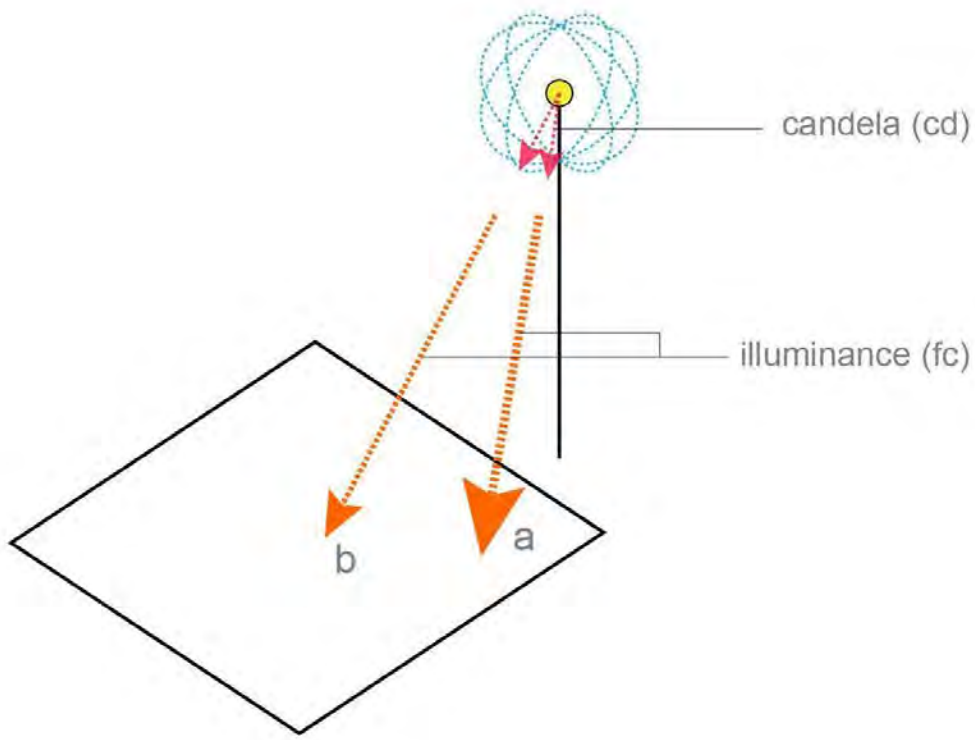



*Illustration showing that even while candles are constant, illuminance can change with distance or angle. Illustration by author.*

### Luminance (cd/m$^2$)

Luminance can be referred to as brightness of a surface (rather than candelas which are sometimes used to qualify glare). Brightness changes with the color (reflectance) of the surface being lit. in Figure 6 below, **the illuminance (b) is the same** for both the white and gray surfaces, but the **luminance (d) is lower for the gray surface than for the white surface (c).**

**Figure 6. Luminance**

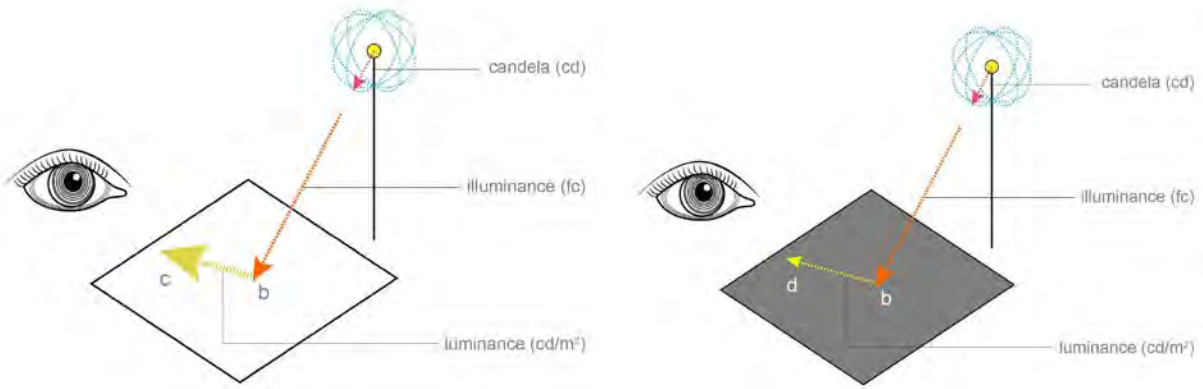



*Illustration showing that luminance of two surfaces will change with color, while illuminance remains constant.*
*Illustration by author.*

### Spectrum, Color Temperature, CCT

While we tend to think of most light as “white”, in reality, light sources can vary in what is called “spectrum” or the color of the light. There is a relationship between ***spectrum and color temperature*** (Figure 7).

Light that appears “cool” tends to have more relative power in the blue part of the visible spectrum. Conversely, light that appears “warm” tends to have more relative power in the yellow and red part of the visible spectrum. LEDs tend to be more blue because their technology makes the bluer range more energy efficient.

Unfortunately, blue light is more triggering for the circadian system, and blue light tends to appear brighter than warmer light of equivalent power (Figure 8).

**Figure 7. Color Temperature Scale**

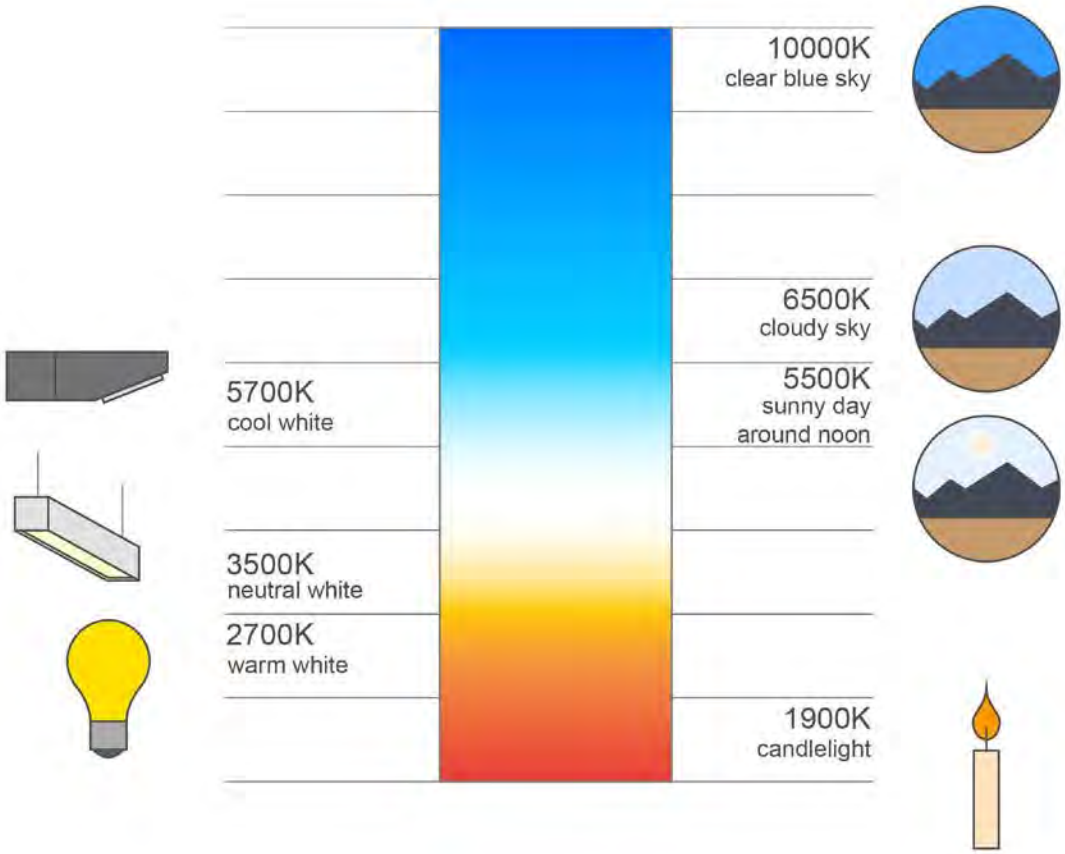
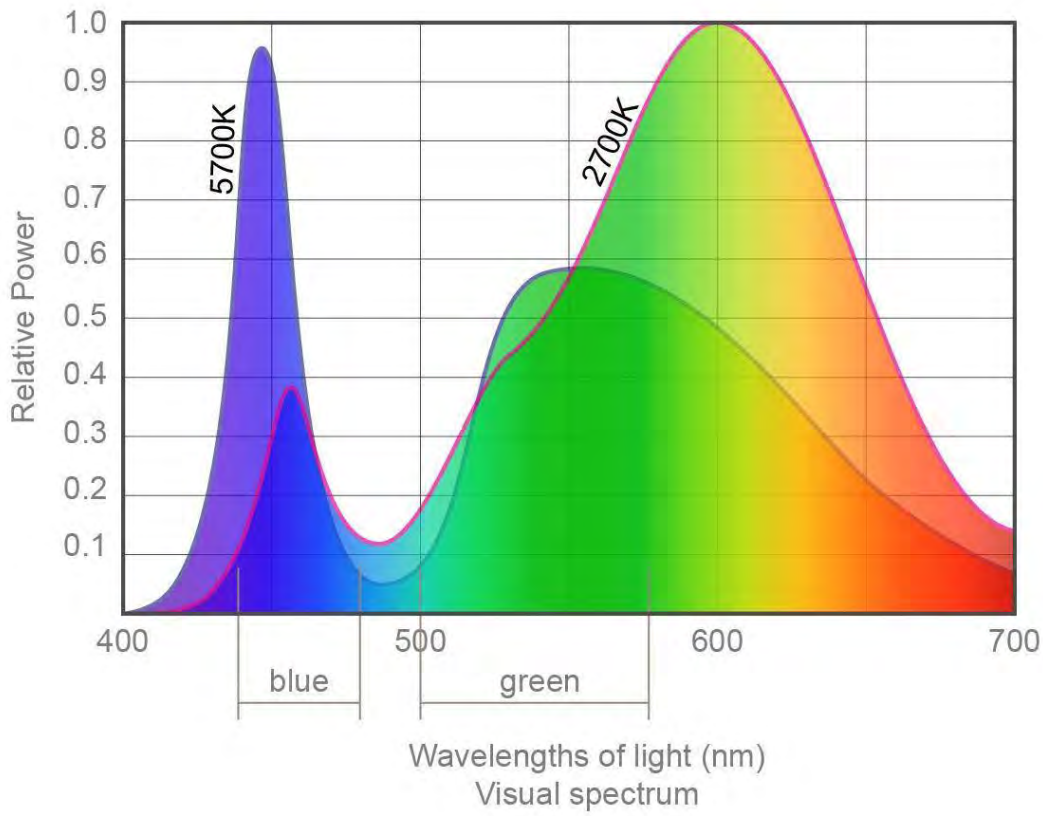



*Illustration of color temperatures.*
*Illustration by author, based on values from https://www.schorsch.com/en/kbase/glossary/cct.html*

**Figure 8. Visual Spectrum**




*Notice that the peak of the 5700K source is close to the peak sensitivity of the circadian system shown in Figure 1 in section 1.1.1*

*Diagram based on: https://www.allthingslighting.org/index.php/2019/02/15/filtered-leds-and-light-pollution/*

### Angle of measurement

When reviewing lighting calculations, it is important to note that sometimes calculations are measured "horizontally" and sometimes "vertically". This is mostly true when talking about illuminance.

> **Horizontal measurement:** This refers to measuring light on a plane parallel to the ground, such as a sidewalk surface, or a tabletop.
>
> **Vertical measurement:** This refers to measuring light on a plane perpendicular to the ground, such as a wall.

### Light is additive

If current light levels on your property are 0.2fc and 0.4fc of additional light are added by a new installation, the new light levels will be 0.6fc, and the light levels will be tripled.

### Photometrics

"Photometrics" is a term often used interchangeably to describe two separate things.

- **photometric calculations** are the final "plots" of calculation grids over a project area that show calculations of illuminance, luminance or other metrics.
- **photometric files (a.k.a. "ies files")** are small computer files made for individual luminaires that contain information on the distribution and power of the light emitted in all directions from a source. These files are used in computer models to produce the photometric calculations.

### Other factors affecting vision

Several things affect our ability to see. The first is that we need much less light to see in darkness than we do during the day. This is due to how our eyes adjust to lower levels of light, versus higher levels. The classic example of this is when entering or leaving a movie theater, our eyes need to adjust for a short time in order to adapt to either a much lower or much higher level of light. In general, it is inappropriate to light nighttime environments to the same levels we light daytime environments.

**Table 2. Typical light levels**

| Typical light levels | |
|---|---|
| Moonlight | 0.01fc |
| Typical office lighting | 30fc |
| Daylight (no sun) | 2,000-12,000 fc |

A second important factor in how we see is age. In general, as we age, we need more light to see, but contrast becomes more significant. Disability glare worsened by very bright sources and reflected light can be of particular issue for older individuals in nighttime environments.

# 2. Evaluation of Proposed Design

This section reviews the proposed design as presented by Musco in the following documents:

- 2020 Musco Photometrics, St Ignatius Prep School FB/SO
- 2020 Musco photo renditions nighttime SI HS VIEWS_01.07.2020.pdf
- Musco light drawings 7-13-20.pdf
- ! candelas Evolution of Light Control-Musco - Saint Ignatius Light Poles.pdf

## 2.1 Project Lighting Zone

The project lighting zone is LZ2. This is defined in the Model Lighting Ordinance and referenced in IES RP 33-14 *Lighting for Exterior Environments* as, "areas with moderate ambient lighting levels," and which typically include, "multifamily residential uses, institutional residential uses, schools, churches, hospitals, hotels/motels, commercial and/or business areas with evening activities embedded in predominantly residential areas, neighborhood serving recreational and playing fields and/or mixed use development with a predominance of residential uses,"[14] (see Appendix 1). This designation is the basis for the light level targets and limits cited below, unless otherwise noted.

The IES is the predominant lighting standards organization in the United States.

## 2.2 Light trespass in proposed design

Table 5 of the IES RP-33-14 *Lighting for Exterior Environments* lists "Maximum Vertical Illuminance at any point in the vertical plane of the property line," (see Appendix 2). The values are organized according to Lighting Zone. On page 15 of Musco's Photometrics ("2020 Musco Photometrics, St Ignatius Prep School FB/SO"), the vertical light levels (measured at 3'-0" above grade), have a maximum of 6.93fc. This is over 20 times what is allowed by the IES.

**Table 3. Maximum vertical illuminance - IES standard versus Musco**

| | IES (LZ2) | Musco Photometrics, p. 15 |
|---|---|---|
| Maximum Vertical Illuminance at any point in the vertical plane of the property line | 0.3fc | 6.93fc |

Another guideline that can be referenced is LEED (Leadership in Energy and Environmental Design). LEED v4.1's Sustainable Sites, Light Pollution Reduction credit sets a more aggressive maximum illuminance value (see Appendix 3), but instead of measuring the light on a vertical plane (up to 33'-0" high) at the property line, they allow a property adjacent to a street

[14] MLO Task Force, *Joint IDA-IES Model Lighting Ordinance*, 2011, p. 7, and IES RP-33-14, *Lighting for Exterior Environments*, 2014, p. 24-25.

(such as St. Ignatius), to use the street centerline as the location of the vertical plane upon which measurements are taken.[15]

**Table 4. Maximum vertical illuminance – LEED standard versus Musco**

| | LEED (LZ2) | Musco Photometrics, p. 6 |
|---|---|---|
| Maximum Vertical Illuminance at property line or street centerline | 0.1fc | 2.6 fc |

The project's photometrics show as much as 2.6fc at 0'-0" off the ground, 26 times the limit for LZ2. Clearly, even if LEED is not being pursued, this is an excessive amount of light spilling off of the property and is unnecessarily disruptive to the neighbors and their property.

## 2.3 Glare in proposed design

Glare is one of the major issues with lighting installations, especially ones like sports lighting where the lights are powerful and prominent. Glare is one of the major complaints that people have about lighting installations.

Musco has presented glare from the design based on maximum candela values, however Musco does not cite a source for the scale they use for their Glare Impact Study. That said, even by their own scale, the project produces a glary environment.

Musco's scale:

- High glare: 150,000cd or more
- Significant glare: 25,000-75,000cd
- Minimal to no glare: 500cd or less

Musco has provided no classification for 500-25,000cd.

According to Musco's calculations, the residences across from the school fall into the "yellow" band which encompasses 1,000-5,000cd which is above their own cut-off for "minimal to no glare", and part of which falls into the non-existing category from 500-25,000cd. Clearly the glare at the properties from the installation is non-negligible.

The IES does not use candelas as a way to evaluate glare, and so, to compare Musco's calculations against a published standard, the CIE 150 2017 Guide on the limitation of the effects of obtrusive light from outdoor lighting installations, Second Edition, can be used (Figure 9).

[15] USGBC, "Light Pollution Reduction - Language," LEED BD+C: New Construction v4.1 - LEED v4.1

**Figure 9. Glare angles**

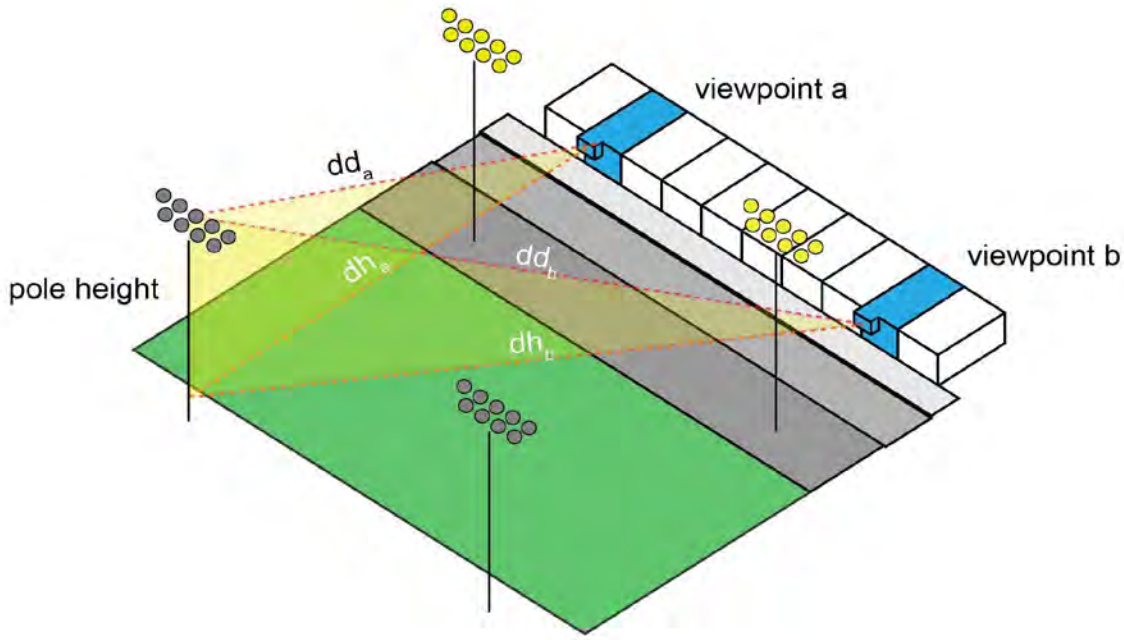



*Illustration of CIE 150: 2017, Table 3. Note: not to scale.*
*Illustration by author.*

In CIE 150: 2017, Table 3, "Maximum values for luminous intensity of luminaires in designated directions," (see Appendix 4) allows users to determine the maximum values for the luminous intensity (cd) of luminaires in designated directions where views of bright surfaces of luminaires are likely to be "troublesome for residents". This metric takes into account the luminance of the scene (via the lighting zone), the luminance of the source itself (cd), the size of the source ($A_p$) and the position (d, distance from the observer).

To calculate what the limit on glare is for the houses along 39th Avenue across from the project, we need to determine their distances from the light sources, the area of the luminous part of the light source itself, and then use the table to calculate the maximum candelas.

For this calculation, we can select (2) representative view points, a and b (see Figure 9 above). If the viewpoints from the second story windows are roughly 12'-0" above the ground, the vertical distance becomes: 90ft-12ft =78ft.

We can assume the size of the Musco lights is 0.03 to 0.13 $m^2$, and the lighting zone is E3 (E2 is shown for comparison), the glare (cd) limit of the luminaire can be calculated as:

Zone E2: Max candela allowed = 5 x distance from light source to the observer (m)
Zone E3: Max candela allowed = 7.5 x distance from light source to the observer (m)

**Table 5. CIE Glare standards versus Musco**

| | Horizontal distance (dh) | Diagonal distance (dd) | CIE Glare limit Zone E2 | CIE Glare limit Zone E3 | Musco's Glare Impact Report |
|---|---|---|---|---|---|
| **Viewpoint a** | 128m | 131m | 655cd | 830cd | 1,000-5,000cd |
| **Viewpoint b** | 164m | 166m | 982.5cd | 1245cd | 1,000-5,000cd |

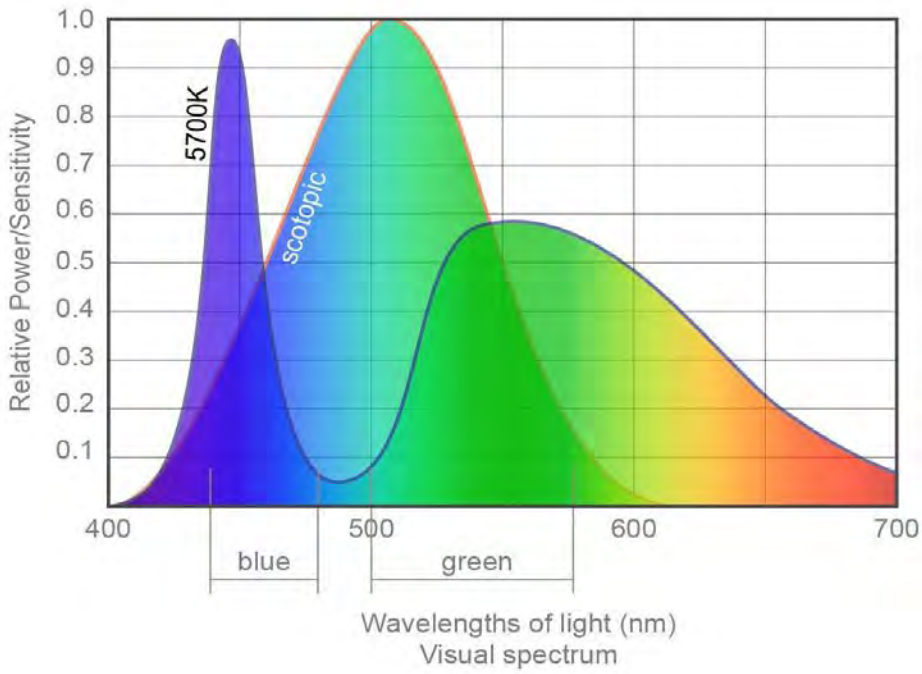
Referring again to Musco's Glare Impact Study, it shows the houses across 39th Avenue from the school as largely falling into the 1,000cd - 5,000cd range, which is much higher than either the E2 or E3 limits.

**Other factors regarding glare**

Glare is also a factor of the spectrum of the light source. "Discomfort glare, the irritation from bright lights in the field of view, tends to be increased with sources richer in short wavelengths (blue light)."[16] This effect is worsened for seniors and those above age 65.[17]

[16] IES RP-33-14, p. 5
[17] "Light and Vision", IES Ready Reference App, Illuminating Engineering Society, 2020.

**Figure 10. Visual Spectrum** (copy of Figure 8)




*Just as the 5700K color temperature is closer to the melanopic response curve, it is also close to the "scotopic" response curve, which governs vision at low light levels (nighttime).*
*Illustration by author based on: "Light and Vision", IES Ready Reference App, Illuminating Engineering Society, 2020 and https://www.allthingslighting.org/index.php/2019/02/15/filtered-leds-and-light-pollution/*

**Other glare metrics**

It should also be noted that there are other methods of evaluating glare that could be used to provide a more thorough and complete picture of the project's potential for glare.

## *Backlight-Uplight-Glare (BUG) Rating Method*

The BUG rating method (Figure 11) is used by California's Title 24 & Calgreen, LEED and the MLO (all use the limits set forth by the MLO). This method uses the photometric files of each light source (aka .ies files) and evaluates the quantity of light (in total number of lumens) being emitted from a source in various directions. For the Backlight and Glare portions of the metric, the rating takes into account the height of the fixture and the distance to the property line.

Musco has not provided the .ies files for their fixtures, so it is not possible to independently evaluate the design based on BUG ratings. However, from the perspective of glare, given the wattage of the luminaires, their heights and the distances from the property line, it is unlikely that the design would comply with the limits set forth in the IES.

**Figure 11. BUG ratings**

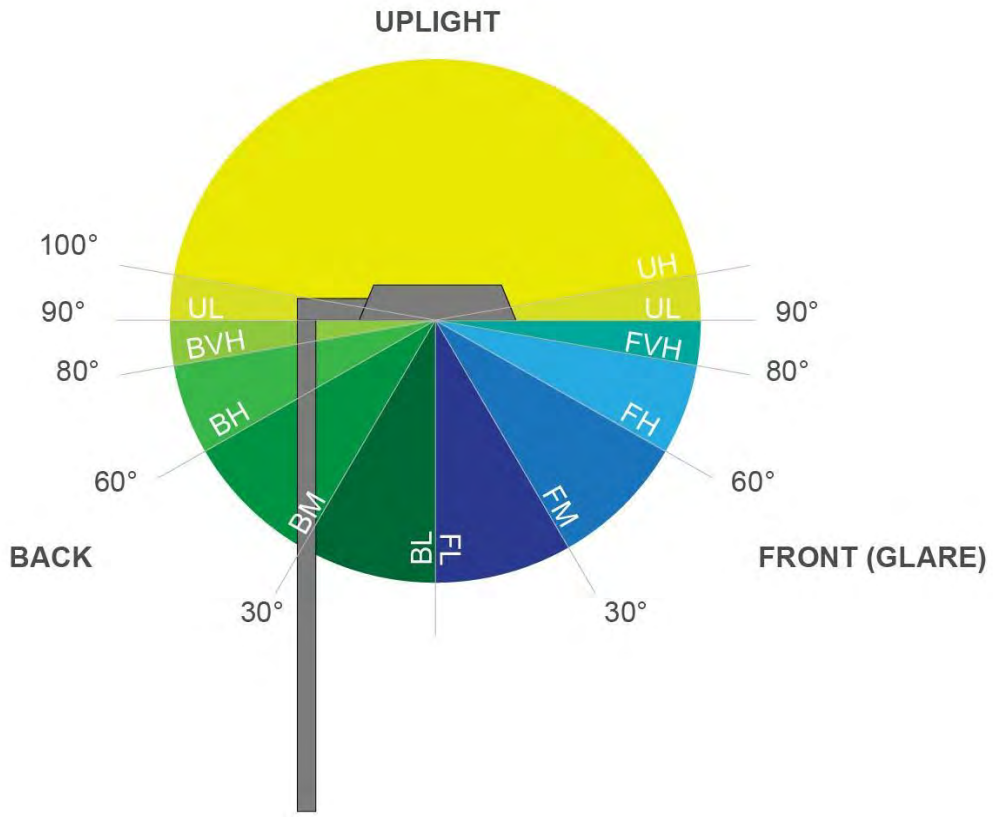



*Illustration of BUG rating*
*Illustration by author.*

### *Calculated glare metrics*

Glare is a complex phenomenon and maximum candelas may not entirely encompass. Current technology and software, including the use of HDR images (computer generated or photographed) can be used to conduct view-based analysis to determine the potential for glare more accurately. Programs such as Evalglare (via Radiance) can be used to calculate various metrics including: CGI (CIE Glare Index), VCP (Visual Comfort Probability), and UGR (Unified Glare Rating, a simplification of CGI).[18]

This is not cost prohibitive, and should be considered for a more complete evaluation of the potential for glare in the project, as well as a possible tool for making improvements to the design.

[18] Note, the metrics cited are specifically applicable to "artificial light sources". Jakubiec, Alstan and Christoph Reinhart ""The Use of Glare Metrics in the Design of Daylit Spaces: Recommendations for Practice," 9th International Radiance Workshop; September 20-21, 2010.

**Why does this matter?**

Glare can make it hard to see while outdoors, and hard to sleep indoors if a strong light is shining into a bedroom window. It is also unsightly and contributes to overall light pollution.

## 2.4 General Light Levels at adjacent properties

It should not go without notice that the current environment in the Sunset Neighborhood, adjacent to St. Ignatius, is a relatively low-light environment. There are some street lights, but the low-density housing and open space and nearby ocean leave the neighborhood in relative darkness, not unlike many other neighborhoods in San Francisco.

While light trespass limits help to understand how much light is spilling from the project onto adjacent property, it does not tell the whole story. The IES provides guidelines for what light levels should be targeted so that the majority of users feel the lighting is visually acceptable.

Because it is not necessary to light all parts of a property, the IES only provides recommendations for certain areas, for example pathways. This is important because it is both atypical and not desirable to light all areas around a house (for instance, the front lawn). The IES provides this in RP-33-14, Table 2b: Illumination Values under the designation “Paths to curb,” (see Appendix 5).

**Table 6. IES acceptable light levels versus Musco**

| Paths to curb-low activity (i.e. sidewalks from front door to street) | IES | Musco Photometrics, pp. 11, 12 |
|---|---|---|
| Horizontal | 0.1fc avg | 0.33fc |
| Vertical | 0.1fc avg | 0.42fc |

Musco is showing light levels 3-4 times what is recommended in an LZ2 residential environment.

**Why does this matter?**

As with the light trespass values, the Musco photometrics show that the installation will significantly impact the light levels for residents, especially those directly across the street from the school. This installation is dramatically changing the character of the neighborhood, particularly for those properties directly across the street. What was once a generally low-light neighborhood is being transformed into a much higher-light-level environment.

## 2.5 Sports field light levels

The Musco field is currently overlit for the class of play. St. Ignatius has stated an anticipated 800-1,500 spectators for football games. According to IES RP-6-15, high school competition play with facilities up to 2000 spectators falls into Class III play. The IES sets a light level of 30fc average for Class III football and soccer (see Appendix 6). Musco's photometrics show an average of more than 50fc on the field.

The IES RP-6-15 *Sports and Recreational Area Lighting* sets illumination targets for play based on **skill level** and **number of spectators**. This is because, "illuminance is determined by the lighting required for the spectators seated farthest from the playing area. This condition may require several times the illuminance level found to be sufficient to the sport."[19]

According to the IES RP-6-15, Table 2: Class of Play (see Appendix 6):

Class III: High school, facilities with spectator capacity under 2,000

Class IV: High school, facilities with limited or no provision for spectators

In addition, during the other vast majority of times when the field will be used for practice with few or no spectators, light levels should be even lower, at Class IV play.

Table 7 below shows the IES target average illumination levels for Class III and IV football and soccer play (see Appendix 6), as well as Musco's designed average.

**Table 7. IES sports field light levels versus Musco**

| | IES Class III Football and Soccer | IES Class IV Football and Soccer | Musco Photometrics, p. 2 |
|---|---|---|---|
| Target Average Illumination Levels | 30fc avg | 20fc avg | 54.71fc avg |

**Why does this matter?**

The current design is overlighting the area. Significant improvements to the project can be made by revising the design to meet the appropriate lighting targets, and by providing a system where light levels can be reduced to the appropriate light level depending on class of play. By reducing the overall field light level, the other lighting metrics will be decreased as well. These include glare, light trespass, and the potential negative effects on health.

## 2.6 Light Pollution/Sky glow

Completely absent from Musco's presentation of the design is any consideration or quantifiable evidence of the effect of the installation on light pollution (sky glow). In general, an evaluation of

[19] IES, RP-6-15 *Sports and Recreational Area Lighting*, 2015, p. 8.

light pollution, through a calculation of “uplight”, or light emitted above horizontal, is missing entirely from the report. The IES, Title 24, LEED and the CIE all provide some criteria upon which uplight can be quantified, and it is important that Musco provide evidence of the performance of their installation via photometric reports.

It is also important to note here that any calculation of uplight must take into account the angle at which the fixtures will be aimed upon installation. A particular fixture .ies file may show light above horizontal, but if the fixtures are then tilted, light above horizontal may be emitted.

**Why does this matter?**

While stargazing and the health of plants and animals may not be the primary concern for this project, it does not mean that the project will not have an adverse effect on this. So far, insufficient attention has been given to the impacts of the project on light pollution, and yet it must be considered as a factor. Light pollution is a significant concern in the effort to conserve our natural environment.

## 2.7 Light, health and schedule

The SI project must be carefully considered because it affects several factors that are important in resetting the circadian clock: ***quantity, spectrum, timing and duration.***

**Quantity**: The installation is adding a significant amount of additional light to the area.

**Spectrum**: The light is a cool-blue-enriched white (5700k) at which the circadian system is more sensitive.

**Timing**: The residents will be exposed to the lighting after dark

**Duration**: the lighting will be on regularly for hours at a time. The school is planning on using the lights 150 nights of the year, until 8:30 or 9:00 pm. More or less, this is the entire school year (September through May), and nearly 5 days a week. Based on when the sun sets, this means that the lights will be on between 2 and 4 hours every night of the school year.

Given that many residents likely have young children, who go to bed earlier than when the lights are scheduled to be turned off, this effectively eliminates darkness for their evenings.

**Why does this matter?**

As stated in the introduction the reduction of darkness at night has the potential to disrupt sleep, keep people awake and may have a direct negative impact on human health. The project should look at alternatives for minimizing the impacts of the lighting installation on the environment and consider the health of the neighborhood residents.

# 3. Conclusion

I disagree with St. Ignatius and Musco that the impacts of the lighting installation will not be significant. The analysis above shows that the project:

- Exceeds IES limits for light trespass
- Exceeds CIE limits for glare
- Exceeds IES recommendations for light levels near the residences
- Exceeds IES recommendations for Class III competitive play for a lower light level
- Fails to characterize the light pollution and uplight of the project

In my opinion, the foreseeable light pollution caused by the project, as demonstrated by the exceedances of the IES and CIE limits discussed above, is significant. The project will fundamentally change the nature of the neighborhood environment, particularly the residences across the street from the project. The project will adversely affect the aesthetics of the neighborhood by increasing glare and light pollution in the area. The quantity, timing, spectrum and duration of the lighting installation will have a deleterious effect on numerous environmental factors, especially the potential for sleep disruption and overall darkness of the environment.

The project proposal by Saint Ignatius and Musco has failed to adequately provide alternative solutions that will mitigate the most negative aspects of the installation. In several cases, the materials provided were insufficient or inadequate to confirm, independently that all steps have been taken to minimize negative impacts on the neighborhood. In the case of the renderings, the materials were misleading and were not produced in a way in which any reasonable conclusions could be drawn. In sum, the incomplete information provided makes it impossible to determine the extent of light pollution that will occur or what types of mitigation or alternatives could be utilized to avoid or substantially lessen the significant light pollution impacts that are likely to occur.

I recommend the study be revised and re-presented to include the following:

1. Provide .ies files and fixture cut sheets for independent verification/study of design proposal, and for confirmation that the fixtures are as well shielded as possible.
2. Provide aiming angles for the fixtures
3. Provide analysis of uplight caused by lighting
4. Provide information on the purpose and distribution of the lights at the different heights shown in Musco's drawing, particularly the ones at 16 and 65ft
5. Conduct a thorough visual analysis using computer software of the overall luminance and potential for glare from the perspective of the residents
6. Revise calculations to meet IES Class III sports lighting levels and provide ability to reduce further during Class IV play
7. Explore options for reducing the quantity of time and/or number of days in which the installation is used

Please feel free to contact me with any questions.

Signed,

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## EXPERIENCE

August 2020-present **Atelier Fos**, Alameda, CA | Principal and Owner
Founder of independent daylighting and lighting consultancy

June 2015-May 2020 **Integral Group, Inc.** Oakland, CA | Principal, Daylighting + Lighting

- Daylighting + Lighting team leader for the US West region
- Managed a team of 4 and over 30 active projects
- Lead Daylighting consultant for the US West region responsible for leading all work and directing simulations
- 10+ Net Zero Energy, 2 WELL and 15+ LEED (7 Platinum) lighting projects
- Project sizes ranging from 50,000 to 1,500,000 sq. ft.
- Daylighting design for complex facade and atrium conditions; landscape and exterior projects using daily illuminance values; glare analysis; glazing and shading recommendations; and daylighting for health and wellness
- Integrated design work with the building performance and sustainability teams to balance energy use and performance with daylighting performance
- Lighting and daylighting controls development
- Delivery of full lighting project documentation, specification, QA/QC and construction administration
- Proposal writing and business development
- Budgeting, forecasting, backlog, work planning

Aug 2009-May 2016 **Solemma, LLC (DIVA-for-Rhino)** Cambridge, MA | CMO, Co-Founder and Developer

- Original team member and core code developer
- Chief Marketing Officer responsible for external relations and website management

Aug 2010-May 2015 **Lam Partners, Inc.** Cambridge, MA | Lighting Designer and Project Manager
Project Manager and designer for over two dozen local, national and international projects ranging from sculptures to 200,000 square foot laboratories

- Concept design and presentation
- Project development and documentation
- Construction Administration including site visits for aiming
- Project management including budgeting and management of deliverables
- LEED documentation for daylighting and sustainable sites credit
- Advanced simulation of lighting and daylighting strategies

Mar 2008-Jul 2008 **TEN Arquitectos** Mexico City, Mexico | Architectural Designer
Designer, modeler, and renderer

Jan 2008-Mar 2008 **Celula Arquitectura** Mexico City, Mexico | Architectural Designer

Designer for the New Sustainable Convention Center in Cabo San Lucas Competition

Oct 2007-Jan 2008 **Machado Silvetti and Associates** Boston, MA | Architectural Designer
Team designer working on a new museum

Jan 2004 – May 2005 **Royer Architects** Newton, MA | Architectural Designer
Principal assistant to the architect for numerous new and renovation residential projects

Apr 2003-Dec 2003 **Community Design Partnership** Boston, MA | Urban Planner
Research and design support for community development plans and urban plans

Aug 2001-Apr 2003 **Kenyon C. Bolton III and Associates** Cambridge, MA | Architectural Designer
Designer for small high-end residential architectural firm

## EDUCATION

Fall 2005-Spring 2010 **Harvard University Graduate School of Design** Cambridge, MA
**Masters of Architecture, 2010**
Thesis | *Architectural Prestidigitation*
Advisor and Reader | Eric Höweler and Eve Blau

Fall 1997-Spring 2001 **The University of Michigan** Ann Arbor, MI
**BA in the History of Art, Summa Cum Laude with Highest Honors, 2001**
Thesis| *Rafael Moneo: The Architectural Event*, Advisors| Robert Levit, Diane Kirkpatrick

## AWARDS

**IES Award of Merit, 2020**
Half Moon Bay Library, Half Moon Bay, CA

**Lighting Magazine 40 Under 40, 2018**
International and North America

**AL Design Awards, 2017 – Best Use of Daylighting**
Baylor University Paul L. Foster Campus for Business and Innovation

**IES Award of Merit, 2016**
Potamus Trading, Boston, MA

## PROFESSIONAL AFFILIATIONS

**LEEDUser Expert**
Interior Lighting Credit

**International Association of Lighting Designers**
Associate IALD

**Leadership in Energy and Environmental Design (LEED)**
LEED BD+C Accredited Professional

## PUBLICATIONS / LECTURES

May 2020 **Light and Health in Buildings**
IG Vision Webinar

March 2018 **Lighting the Way to Net-Zero Buildings**
Presented with Sara Lappano
Lightfair International 2018, Chicago, IL

November 2017 **Advanced Lighting Controls – Net Zero Energy Lighting**
Pacific Energy Center

November 2015 ***Light + Health, Research and Practice***
Presented with Celine Vetter and Dieter Lang
ABX Architecture Boston Expo, Boston, MA
***Is it worth it? Defending Shading Strategies on your Project***
Presented with Alejandra Menchaca and Rufei Wang
ABX Architecture Boston Expo, Boston, MA

August 2015 ***Integrating shading, lighting and glare - Achieving reliable results for clients***
14th International Radiance Workshop, Philadelphia, PA

November 2013 ***Media and Architecture Integration: New Territories for Lighting and Architecture***
Presented with Robert Osten
ABX Architecture Boston Expo, Boston, MA

August 2013 ***Early Phase Simulations & DIVA Demo***
12th International Radiance Workshop, 2013, NREL, Golden, CO

May 2012 ***New Modeling Methods in Daylighting Analysis***
Co-presented with Alstan Jakubiec and Jeff Niemasz
Lightfair 2012, Las Vegas, NV

August 2010 ***Animated Building Performance Simulation (ABPS) – Linking Rhinoceros/Grasshopper with Radiance/Daysim***
Publication in the Proceedings of SimBuild 2010, New York City, NY
8th International Radiance Workshop, 2009, Cambridge, MA

2012-present **Guest Lecturer and Critic**
Harvard University Graduate School of Design, Cambridge, MA
Boston Architectural College, Boston, MA
MASS College of Art and Design, Boston, MA
UC Berkeley, Berkeley, CA
UCSF, San Francisco, CA
Pacific Energy Center, San Francisco, CA

## PROJECT LIST

*Indicates Lead Designer and Lighting Project Manager

### ACADEMIC/INSTITUTIONAL

Amherst College New Science Center
Amherst, MA
Behnisch Architekten

The Boston Conservatory
Boston, MA
Utile

Boston Public Library, Jamaica Plain Branch
Boston, MA
Utile

Brown University – Power Station Renovation
Providence, RI
Gensler

Charles River Associates
Boston, MA
Elkus Manfredi Architects

Colgate University Admissions Building
Hamilton, NY
Sasaki Associates, Inc.

Confidential Educational Project*
Loomis, CA
Lake | Flato Architects

Contra Costa Community College
New Science Building*
Smith Group
San Pablo, CA

Dechert Boston
Boston, MA
HOK

Diablo Valley College Kinesiology and Art Buildings*
Pleasant Hill, CA
HMC Architects

Half Moon Bay Library*
Half Moon Bay, CA
Noll & Tam
**IES Award of Merit Winner, 2020**

Northern Essex Community College
Lawrence, MA
Miller Dyer Spears

Oakland USD Commissary*
Oakland, CA
Cody Andersen Wasney

Presidio Knolls School*
San Francisco, CA
Studio Bondy

Piedmont USD STEAM and Theater Buildings*
Piedmont, CA
HKIT

Rainbow Recreation Center*
Oakland, CA
Byrens Kim

Sacred Heart School*
Atherton, CA
WRNS

UC Merced Downtown Campus*
Merced, CA
Heller Manus

UCSD Pepper Canyon*
San Diego, CA
Safdie Rabines Architects

Westfield State University Dorm
Westfield, MA
ADD, Inc. (now Stantec)

The Westminster Schools
Campbell Hall, Westminster Center Phase 1,
Stadium and Plaza

Atlanta, GA
Ennead

**CIVIC + COURTHOUSE**
Atherton Police Station and Civic Center*
Atherton, CA
WRNS

Elk Grove Community and Senior Center*
Elk Grove, CA
Group 4 Architects

Salem Probate and Family Court
Salem, MA
Perry Dean Rogers

**COMMERCIAL**
CBRE Offices
Boston, MA
Elkus Manfredi Architects

Confidential New Company Headquarters*
Vancouver, MA
Morphosis

Confidential New Office Building*
Redmond, WA
WRNS

Dudley Square Municipal Building
Boston, MA
Sasaki Associates, Inc.

East Bay Municipal Utility District*
Oakland, CA
EBMUD

Grande Cheese
Fond-du-Lac, WI
Overland Partners

Alameda County Information
Technology Department*
Oakland, CA
Komorous Towey Architects

Intuit Mountain View*
Mountain View, CA
WRNS

Loomis Sayles
Boston, MA
Gensler

Interface Global Headquarters
LEED and WELL Lighting Consultant*
Atlanta, GA
Perkins + Will

Nonprofits Insurance Alliance of California*
Santa Cruz, CA
EHDD

Potamus Trading
Boston, MA
Elkus Manfredi
**IES Award of Merit Winner, 2016**

WS Development
Chestnut Hill, MA
Elkus Manfredi Architects

**HEALTHCARE**
Paradise Valley Estates Senior and Memory Care*
Fairfield, CA
Perkins Eastman

**LANDSCAPE**
2060 Folsom*
San Francisco, CA
Mithun

Grande Cheese
Fond-du-Lac, WI
Overland Partners

Intuit Mountain View*
Mountain View, CA
WRNS

Maceo May Apartments*
Treasure Island, CA
Mithun

Pier 70 Building E2*
San Francisco, CA
MBH and Kennerly Architects

Nonprofits Insurance Alliance of California*
Santa Cruz, CA
EHDD

South San Francisco Caltrain Station
Pedestrian Plaza and Tunnel*
South San Francisco, CA
SWA Group

UCSD Pepper Canyon*
San Diego, CA
Safdie Rabines Architects

The Westminster Schools
Campbell Hall, Westminster Center Phase 1,
Stadium and Plaza
Atlanta, GA
Ennead

**RESIDENTIAL**
1700 Webster*
Oakland, CA
Perkins + Will

2060 Folsom*
San Francisco, CA
Mithun

Altamira Apartments*
Sonoma, CA
Pyatok Architects

Caritas Village*
Sonoma, CA
Pyatok Architects

Camp Southern Ground*
Fayetteville, GA
Perkins + Will

The Laureate*
Berkeley, CA
Pyatok

Maceo May Apartments*
Treasure Island, CA
Mithun
Paradise Valley Estates Senior and Memory Care*
Fairfield, CA
Perkins Eastman

Pier 70 Building E2*
San Francisco, CA
MBH and Kennerly Architects

Stanford University Faculty Housing*
Palo Alto, CA
Lum Architects

**LABORATORY**
CCC New Science Building
San Pablo, CA
Smith Group

LBNL Integrated Genomics Lab*
Berkeley, CA
Smith Group

Quest Diagnostics
Marlborough, MA
Gensler

Santa Rosa Junior College
New Science Building
Santa Rosa, CA
Smith Group

**MUSEUM, GALLERY AND SCULPTURE**
205 Alice Street*
Oakland, CA
Amato Architects

American Civil War Museum
Richmond, VA
Baskervill

Marriott Lobby Sculpture
New Delhi, India
Nikolas Weinstein

Peirce Hill
Singapore
Nikolas Weinstein

San Francisco Public Safety Building
Fallen Officer's Memorial
San Francisco, CA
Shimon Attie

Stubbs Road
Hong Kong
Nikolas Weinstein

**RETAIL**
Market Basket #66
Hooksett, NH
Prellwitz/Chilinski Associates, Inc.

**URBAN and FAÇADE**
Liberty Mutual Headquarters
Boston, MA
CBT/Childs Bertman Tseckares, Inc.

New Orleans Arena Façade Lighting
New Orleans, LA
Eskew Dumez + Ripple

New York Port Authority Bus Terminal
New York, NY
A2a Media

**TRANSPORTATION**
Greenville-Spartanburg Int'l Airport
Terminal Improvement Program
Greer, SC
Gensler

South San Francisco Caltrain Station
Pedestrian Plaza and Tunnel*
South San Francisco, CA
SWA Group

**DAYLIGHTING**

Arizona State University
Tempe, AZ
KPF

Baylor University
Paul L. Foster Campus for
Business and Innovation
Waco, TX
Overland Partners
**A|L Awards Best Use of Daylighting, 2017**

Cholera Treatment Center Pavilions*
Port-au-Prince, Haiti
MASS Design Group

Confidential New Company Headquarters*
Vancouver, MA
Morphosis

Confidential New Office Building*
Redmond, WA
WRNS

Confidential Office Building Renovation/Expansion*
Silicon Valley, CA
WRNS

Denver Water*
Denver, CO
RNL Architects

Harker School
San Jose, CA
Studio Bondy

Martin Luther King School*
Net Zero Energy Target
Cambridge, MA
Perkins Eastman

Oakland USD Madison*
Oakland, CA
Byrens Kim

Regen Projects Gallery
Los Angeles, CA
Michael Maltzan Architects

Ross School of Business – Phase 2
Ann Arbor, MI
KPF

Snowmass Condominiums*
Snowmass, CO
4240 Architecture

UMass Lowell Student Center
Lowell, MA
Perkins + Will

# Appendix 1

**Lighting Zone Definitions**

IES Outdoor Environmental Lighting Committee, *Lighting for Exterior Environments*, RP-33-14.
New York: Illuminating Engineering Society, 2014.

IES RP-33-14

# Lighting for Exterior Environments

Publication of this Recommended Practice
has been approved by IES.
Suggestions for revisions
should be directed to IES.

Prepared by:
The IES Outdoor Environmental Lighting Committee

Lighting zones are best implemented as an overlay to the established zoning especially in communities where a variety of zone districts exist within a defined area or along an arterial street. Where zone districts are cohesive, it may be possible to assign lighting zones to established land use zoning. It is recommended that the lighting zone includes churches, schools, parks, and other uses embedded within residential communities.

Lighting zones help communities minimize the contrast (and conflict) between extremes in lighting such as a brightly lighted car dealership adjacent to or within line of sight to a residential neighborhood, or a lighted sports facility in the middle of a residential neighborhood. Lighting zones may also determine restrictions on outdoor lighting that impact "places of sleep" such as residential areas, hospitals, and long term care facilities. Lighting zones may also employ vertical distinctions such as in mixed use facilities where the commercial aspects are on the street with residential units on the higher levels. Zones also encourage minimal changes in visual adaptation when traveling from site to site.

However, if an adjacent use could be adversely impacted by allowable lighting, the adopting authority may require that a particular site meet the requirements for a lower lighting zone. For example, the authority could specify Lighting Zone 1 or 2 requirements if a commercial development were adjacent to a residence, hospital or open space, or to any land assigned to a lower zone.

Community involvement is important in determining lighting zone issues, such as whether and how to light churches, schools, ice rinks, or playing fields. Among the factors that should be considered are neighborhood ambient conditions, lighting expectations, special environmental concerns, and how interior lighting may affect the exterior environment. Curfews and controls are appropriate for all lighting zones, and should be specified.

**2.5.1 Lighting Zone Definitions** Because identifying the appropriate outdoor lighting zone is a matter of judgment and consensus, there is no means of determining which zone is appropriate for a given area. The same type of lighting application may fall into different lighting zones in different jurisdictions or using different standards. As used in the *Joint IDA-IES Model Lighting Ordinance (MLO)*, the lighting zones are defined with suggested uses as follows:

› **LZ0:** No ambient light
Areas where the natural environment could be seriously and adversely affected by small amounts of electric lighting at night. This includes biological cycles of flora and fauna, and human enjoyment and appreciation of the natural environment. The vision of human residents and users is adapted to the total darkness, and they do not expect to see electric lighting. Human activity is sparse and is subordinate in importance to the natural environment. There is no expectation for electric lighting. Although some lighting is allowed, it is required to be controlled.

| | | |
|---|---|---|
| LZ-0 | Lighting Zone 0 should be applied to areas in which permanent lighting is not expected and when used, is limited in the amount of lighting and the period of operation. LZ-0 typically includes undeveloped areas of open space, wilderness parks and preserves, areas near astronomical observatories, or any other area where the protection of a dark environment is critical. Special review should be required for any permanent lighting in this zone. Some rural communities may choose to adopt LZ-0 for residential areas. | Recommended default zone for wilderness areas, parks and preserves, and undeveloped rural areas.<br><br>Includes protected wildlife areas and corridors. |

› **LZ1:** Low ambient light
Developed areas within a natural environment and areas of human activity that are inherently dark at night. Electric lighting at night could adversely affect the biological cycles of flora and fauna, or could interrupt the quiet, dark character of the area. The vision of human residents and users is adapted to the low light levels, and they do not expect to see electric lighting except where absolutely necessary to improve visibility and safety. In these limited areas, low light levels are appropriate. Lighting is expected to be non-continuous (i.e., pools of light rather than uniform lighting along a path or roadway). After curfew, both light levels and uniformity may be reduced in some areas.

| | | |
|---|---|---|
| LZ-1 | Lighting Zone 1 pertains to areas that desire low ambient lighting levels. These typically include single and two family residential communities, rural town centers, business parks, and other commercial or industrial/storage areas typically with limited nighttime activity. May also include the developed areas in parks and other natural settings. | Recommended default zone for rural and low density residential areas.<br>Includes residential single or two family; agricultural zone districts; rural residential zone districts; business parks; open space include preserves in developed areas. |

**Figure 11: Parking Lot located in a Lighting Zone 1 community. Aspen, CO.** (Image courtesy of N. Clanton)

› **LZ2:** Moderate ambient light
Areas of human activity (i.e., habitation, recreation and/or work) where electric lighting may be required for safety and convenience at night. The vision of human residents and users is adapted to moderate light levels, and they have moderate expectations of electric lighting. Lighting is expected to be non-continuous (e.g., pools of light at crosswalks or intersections, rather than uniform lighting along a path or street). After curfew, both light levels and uniformity may be reduced in some areas as activity levels decline.

| | | |
|---|---|---|
| LZ-2 | **Lighting Zone 2 pertains to areas with moderate ambient lighting levels. These typically include multifamily residential uses, institutional residential uses, schools, churches, hospitals, hotels/motels, commercial and/or businesses areas with evening activities embedded in predominately residential areas, neighborhood serving recreational and playing fields and/or mixed use development with a predominance of residential uses. Can be used to accommodate a district of outdoor sales or industry in an area otherwise zoned LZ-1.** | **Recommended default zone for light commercial business districts and high density or mixed use residentialdistricts.** Includes neighborhood business districts; churches, schools and neighborhood recreation facilities; and light industrial zoning with modest nighttime uses or lighting requirements. |

**Figure 12: Parking Lot in LZ 2 - Fully shielded, uniform distribution. Anchorage, AK** (Image courtesy of N. Clanton)

› **LZ3:** Moderately high ambient light
Areas of human activity (i.e., habitation, recreation and/or work) where electric lighting may be continuous and is required for safety and convenience at night. The vision of human residents and users is adapted to moderately high light levels, and they have moderate to high expectations of electric lighting. Lighting is expected to be continuous (e.g. lighting delivered fairly evenly along the length of a path or street). After curfew, both light levels and uniformity may be reduced in some areas as activity levels decline.

| | | |
|---|---|---|
| LZ-3 | **Lighting Zone 3 pertains to areas with moderately high lighting levels. These typically include commercial corridors, high intensity suburban commercial areas, town centers, mixed use areas, industrial uses and shipping and rail yards with high night time activity, high use recreational and playing fields, regional shopping malls, car dealerships, gas stations, and other nighttime active exterior retail areas.** | **Recommended default zone for large cities' business district.** Includes business zone districts; commercial mixed use; and heavy industrial and/or manufacturing zone districts. |

**Figure 13: A Long Term Care Facility in LZ 3 with well-shielded lighting – no uplight.** (Image courtesy of David Roederer)

› **LZ4:** High ambient light
Areas of high levels of human activity at night including significant interaction among pedestrians and/or vehicles. The vision of humans when outside is typically adapted to moderate light levels. Lighting is continuous and is required for safety and convenience. Expectations for man-made lighting are high, both in terms of light levels and uniformity along pathways or streets. However, both light levels and uniformity may be reduced after curfew hours in some areas as activity levels decline.

| | | |
|---|---|---|
| LZ-4 | **Lighting zone 4 pertains to areas of very high ambient lighting levels. LZ-4 should only be used for special cases and is not appropriate for most cities. LZ-4 may be used for extremely unusual installations such as high density entertainment districts, and heavy industrial uses.** | **Not a default zone.** Includes high intensity business or industrial zone districts. |

**Figure 14: Entertainment district in urban area in LZ 4.** (Image courtesy of N. Clanton)

# Appendix 2

**IES Lighting for Exterior Environments,**
**Table 5: Minimum Vertical Illuminance at any point**
**in the vertical plane of the property line**

IES Outdoor Environmental Lighting Committee, *Lighting for Exterior Environments*, RP-33-14.
New York: Illuminating Engineering Society, 2014.

IES RP-33-14

# Lighting for Exterior Environments

Publication of this Recommended Practice
has been approved by IES.
Suggestions for revisions
should be directed to IES.

Prepared by:
The IES Outdoor Environmental Lighting Committee

**Figure 10: Light Trespass. Decorative globe allows light to spill onto the façade and also into residential windows.** (Image courtesy of Clanton & Associates)

underlie any restrictions. Refer to the *Joint IDA-IES Model Lighting Ordinance (MLO)* and *TM-15-11* for limits on luminaire BUG ratings, property line maximum illuminance, and lumen density per lighting zone. Lighting zones and the BUG rating system can provide the basis for restricting the brightness that should be tolerated in a specific environment. Within any category, a curfew time may be established, allowing higher lighting levels during those hours when the curfew is not in effect.

Since light trespass is extremely subjective, there is no single set of values or limits that will work in every situation. The report *IES TM-11-00/R11 Light Trespass: Research, Results and Recommendations*[26] suggests that light trespass can be evaluated by illuminance values measured at the eye in a plane perpendicular to the line-of-sight when looking at the brightest source in the field of view. This report also stresses the subjectivity of the research and how it may be affected by the personalities and desires of different individuals.

While these recommendations serve to reduce serious light trespass, their implementation is not a guarantee against objections. In some situations, such as a sports field in a small park closely surrounded by residences, no methods and combinations of lighting design, aiming, or control can provide for both safe play and satisfy some neighbors' desires for limited light trespass. Consensus solutions involving field locations, curfews to restrict the hours of nighttime use, glare abatement, or landscape screens should be reached by all the parties involved. Refer to **Table 5** below.

**Table 5 : Maximum Vertical Illuminance at any point in the vertical plane of the property line. (From Table F *Joint IDA-IES MLO*)**

| Lighting Zone 0 | Lighting Zone 1 | Lighting Zone 2 | Lighting Zone 3 | Lighting Zone 4 |
|---|---|---|---|---|
| 0.05 FC or 0.5 LUX | 0.1 FC or 1.0 LUX | 0.3 FC or 3.0 LUX | 0.8 FC or 8.0 LUX | 1.5 FC or 15.0 LUX |

## 2.5 Lighting Zones

Zoning is a well–established practice in community planning. The fundamental idea behind zoning is that it allows a community to determine and regulate appropriate types of use in different areas within its jurisdiction, for example to define acceptable land uses in different areas. Lighting zones, which reflect the base (or ambient) light levels desired by a community, work well with land use zones in setting limits on the type and amount of lighting that can be used in different areas. Using lighting zones allows a great deal of flexibility and customization without the burden of excessive regulation.

The choice of an appropriate lighting zone is a matter of judgment based on community priorities for any given area. It is recommended that the lowest reasonable lighting zone(s) be adopted. Selection of lighting zone or zones should be based not on existing conditions but rather on the type of lighting environments the jurisdiction seeks to achieve. For instance, new development on previously rural or undeveloped land may be zoned as LZ-1.

# Appendix 3

**LEED v4.1 Light Pollution Reduction**

**Table 4, Maximum vertical illuminance at lighting boundary, by lighting zone**

USGBC, “Light Pollution Reduction,” LEED BD+C New Construction, v4.1, 2020.

## Table 4. maximum vertical illuminance at lighting boundary, by lighting zone

| MLO lighting zone | Vertical illuminance |
|---|---|
| LZ0 | 0.05 fc (0.5 lux) |
| LZ1 | 0.05 fc (0.5 lux) |
| LZ2 | 0.10 fc (1 lux) |
| LZ3 | 0.20 fc (2 lux) |
| LZ4 | 0.60 fc (6 lux) |

# Appendix 4

**CIE 150, 2017**

**Table 3, Maximum values for luminous intensity of luminaires in designated directions**

Members of TC 5-28 “Guide on the Limitation of the Effects of Obtrusive Light”, *Guide on the limitation of the effects of obtrusive light from outdoor lighting installations, Second Edition*, CIE 150 2017. Vienna: Commission Internationale de L’Eclairage, 2017.

ISBN 978-3-902842-48-0
DOI: 10.25039/TR.150.2017

International Commission on Illumination
Commission Internationale de l'Eclairage
Internationale Beleuchtungskommission

# TECHNICAL REPORT

## Guide on the Limitation of the Effects of Obtrusive Light, 2nd Edition

**CIE 150:2017**

UDC: 628.931
628.971

Descriptor: Artificial lighting: Design and calculation
Exterior lighting

**Table 3 – Maximum values for luminous intensity of luminaires in designated directions**

| Light Technical Parameter | Application Conditions | Luminaire group (projected area $A_p$ in m²) | | | | |
|---|---|---|---|---|---|---|
| | | $0<A_p\leq0{,}002$ | $0{,}002<A_p\leq0{,}01$ | $0{,}01<A_p\leq0{,}03$ | $0{,}03<A_p\leq0{,}13$ | $0{,}13<A_p\leq0{,}50$ |
| Maximum luminous intensity emitted by luminaire ($I$ in cd) | **Environmental Zone E0**<br>Pre-curfew:<br>Post-curfew: | 0<br>0 | 0<br>0 | 0<br>0 | 0<br>0 | 0<br>0 |
| | **Environmental Zone E1**<br>Pre-curfew:<br>Post-curfew: | $0{,}29\cdot d$<br>0 | $0{,}63\cdot d$<br>0 | $1{,}3\cdot d$<br>0 | $2{,}5\cdot d$<br>0 | $5{,}1\cdot d$<br>0 |
| | **Environmental Zone E2**<br>Pre-curfew:<br>Post-curfew: | $0{,}57\cdot d$<br>$0{,}29\cdot d$ | $1{,}3\cdot d$<br>$0{,}63\cdot d$ | $2{,}5\cdot d$<br>$1{,}3\cdot d$ | $5{,}0\cdot d$<br>$2{,}5\cdot d$ | $10\cdot d$<br>$5{,}1\cdot d$ |
| | **Environmental Zone E3**<br>Pre-curfew:<br>Post-curfew: | $0{,}86\cdot d$<br>$0{,}29\cdot d$ | $1{,}9\cdot d$<br>$0{,}63\cdot d$ | $3{,}8\cdot d$<br>$1{,}3\cdot d$ | $7{,}5\cdot d$<br>$2{,}5\cdot d$ | $15\cdot d$<br>$5{,}1\cdot d$ |
| | **Environmental Zone E4**<br>Pre-curfew:<br>Post-curfew: | $1{,}4\cdot d$<br>$0{,}29\cdot d$ | $3{,}1\cdot d$<br>$0{,}63\cdot d$ | $6{,}3\cdot d$<br>$1{,}3\cdot d$ | $13\cdot d$<br>$2{,}5\cdot d$ | $26\cdot d$<br>$5{,}1\cdot d$ |

NOTE 1 $d$ is the distance between the observer and the glare source in metres.
NOTE 2 A luminous intensity of 0 cd can only be realized by a luminaire with a complete cut-off in the designated directions.
NOTE 3 For further information, please refer to Annex C.

### 3.6.5.3 Limitation of the effects on transport systems

Limits apply where users of transport systems are subject to a reduction in the ability to see essential information. Table 4 gives values that are for relevant positions and for viewing directions in the path of travel.

**Table 4 – Maximum values of threshold increment and veiling luminance from non-road lighting installation**

| Light Technical Parameter | Road Classification[1] | | | |
|---|---|---|---|---|
| | No road lighting | M6 / M5 | M4/ M3 | M2 / M1 |
| Veiling luminance[2] ($L_v$) | 0,037 cd/m² | 0,23 cd/m² | 0,40 cd/m² | 0,84 cd/m² |
| Threshold increment | 15 % based on adaptation luminance of 0,1 cd/m² | 15 % based on adaptation luminance of 1 cd/m² | 15 % based on adaptation luminance of 2 cd/m² | 15 % based on adaptation luminance of 5 cd/m² |

[1] Road Classifications as given in CIE 115:2010 (CIE, 2010).
[2] The veiling luminance values specified in this table are based on a permissible TI value of 15 %.

### 3.6.5.4 Limitation of sky glow

Table 5 specifies maximum values of upward light ratio (ULR) of luminaires, without taking into account the effect of light reflected upwards from the ground that also contributes to sky glow. This is the traditional method to limit sky glow and suitable to compare different single luminaires.

# Appendix 5

**IES Lighting for Exterior Environments**
**Table 2b, Illumination Values**

IES Outdoor Environmental Lighting Committee, *Lighting for Exterior Environments*, RP-33-14.
New York: Illuminating Engineering Society, 2014.

IES RP-33-14

# Lighting for Exterior Environments

Publication of this Recommended Practice
has been approved by IES.
Suggestions for revisions
should be directed to IES.

Prepared by:
The IES Outdoor Environmental Lighting Committee

| Applications and Tasks[a] | Notes | Recommended Maintained Illuminance Targets (lux)[b, c, d] Horizontal ($E_h$) Targets: Visual Ages of Observers (years) where at least half are <25 | 25-65 | >65 | Gauge | Category | Vertical ($E_v$) Targets: Visual Ages of Observers (years) where at least half are <25 | 25-65 | >65 | Gauge | Uniformity Targets[e] Over Area of Coverage[f]: 1st ratio $E_h$/2nd ratio $E_v$ if different uniformities apply: Max:Avg | Avg:Min | Max:Min | Typical Area of Coverage[g]: Task Area | Area |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Category | | | Gauge | Category | | | | Gauge | | | | | |
| **ACCENTING** | **Accenting influences observers' overall brightness perceptions and provides visual relief. Accenting is also used for visual attraction and wayfinding. Ref. to the *IES Lighting Handbook, 10th Edition Ch. 15*. These are criteria for consideration in any application. Extinguish at curfew.** | | | | | | | | | | | | | | |
| • Art | On artwork plane (typically vertical) | | | | | | see IES HB 10e Table 15.2 | | | | | | | | |
| • Feature | On wall plane or trees | | | | | | see IES HB 10e Table 15.2 | | | | | | | | |
| • Important Focal Point | On focal point plane (typically vertical) | | | | | | see IES HB 10e Table 15.2 | | | | | | | | |
| • Performance Areas | $E_h$ @pavement; $E_v$ @5' AFG | see IES HB 10e Table 15.2 | | | | | see IES HB 10e Table 15.2 | | | | | | | | |
| • Perimeter | On wall plane or trees | | | | | | see IES HB 10e Table 15.2 | | | | | | | | |
| **BUILDING ENTRIES** | **OUTDOOR** | | | | | | | | | | | | | | |
| • Canopied Entries/Exits | At dropoff curbs to entries under canopy. Also see BUILDING ENTRIES/No Cover and BUILDING ENTRIES/Porte Cocheres. | | | | | | | | | | | | | | |
| • High Activity[i] | Curbs typified by periods of high pedestrian and vehicular traffic; $E_h$ @grade; $E_v$ @5' AFG in directions of ingress/egress | | | | | | | | | | | | | | |
| · LZ4[j] | | J | 20 | 40 | 80 | Avg | H | 10 | 20 | 40 | Avg | 4:1 | 2:1 | | |
| · LZ3[j] (and LZ4 curfew) | | I | 15 | 30 | 60 | Avg | G | 7.5 | 15 | 30 | Avg | 4:1 | 2:1 (4:1) | | |
| · LZ2[j] (and LZ3 curfew) | | H | 10 | 20 | 40 | Avg | F | 5 | 10 | 20 | Avg | 3:1 | 2:1 (4:1) | | |
| · LZ1[j] (and LZ2 curfew) | | G | 7.5 | 15 | 30 | Avg | E | 4 | 8 | 16 | Avg | 3:1 | 2:1 (4:1) | | |
| · LZ0[j] (and LZ1 curfew) | Control with motion sensors | F | 5 | 10 | 20 | Avg | D | 3 | 6 | 12 | Avg | 2:1 | | | |
| • Medium Activity[i] | Curbs typified by periods of medium pedestrian and vehicular traffic; $E_h$ @grade; $E_v$ @5' AFG in directions of ingress/egress | | | | | | | | | | | | | | |
| · LZ4[j] | | H | 10 | 20 | 40 | Avg | F | 5 | 10 | 20 | Avg | 4:1 | 2:1 | | |
| · LZ3[j] (and LZ4 curfew) | | G | 7.5 | 15 | 30 | Avg | E | 4 | 8 | 16 | Avg | 4:1 | 2:1 (4:1) | | |
| · LZ2[j] (and LZ3 curfew) | | F | 5 | 10 | 20 | Avg | D | 3 | 6 | 12 | Avg | 3:1 | 2:1 (4:1) | | |
| · LZ1[j] (and LZ2 curfew) | | E | 4 | 8 | 16 | Avg | C | 2 | 4 | 8 | Avg | 3:1 | 2:1 (4:1) | | |
| · LZ0[j] (and LZ1 curfew) | Control with motion sensors | D | 3 | 6 | 12 | Avg | B | 1 | 2 | 4 | Avg | 2:1 | | | |
| • Low Activity[i] | Curbs typified by periods of low pedestrian and vehicular traffic; $E_h$ @grade; $E_v$ @5' AFG in directions of ingress/egress | | | | | | | | | | | | | | |
| · LZ4[j] | | F | 5 | 10 | 20 | Avg | D | 3 | 6 | 12 | Avg | 4:1 | 2:1 | | |
| · LZ3[j] (and LZ4 curfew) | | E | 4 | 8 | 16 | Avg | C | 2 | 4 | 8 | Avg | 4:1 | 2:1 (4:1) | | |
| · LZ2[j] (and LZ3 curfew) | | D | 3 | 6 | 12 | Avg | B | 1 | 2 | 4 | Avg | 3:1 | 2:1 (4:1) | | |
| · LZ1[j] (and LZ2 curfew) | | C | 2 | 4 | 8 | Avg | A | 0.5 | 1 | 2 | Avg | 3:1 | 2:1 (4:1) | | |
| · LZ0[j] (and LZ1 curfew) | Control with motion sensors | B | 1 | 2 | 4 | Avg | - | 0 | 0 | 0 | | 2:1 | | | |
| • Intercom call system access | $E_v$ on call-interface device, unless self-illuminated | | | | | | H | 10 | 20 | 40 | Avg | | 2:1 | | |
| • Non-covered Entries/Exits | | | | | | | | | | | | | | | |
| • Immediate Exterior | Width of door; $E_h$ @grade at threshold; $E_v$ within 3' of threshold and @5' AFG in direction of ingress or security camera | | | | | | | | | | | | | | |
| · High activity[i] | Entries/Exits typified by periods of high pedestrian traffic | | | | | | | | | | | | | | |
| LZ4[j] | | | 10 | 10 | 10 | Min | H | 10 | 20 | 40 | Avg | 4:1 | 2:1 | | |
| LZ3[j] (and LZ4 curfew) | | | 10 | 10 | 10 | Min | G | 7.5 | 15 | 30 | Avg | 4:1 | 2:1 (4:1) | | |
| LZ2[j] (and LZ3 curfew) | | | 10 | 10 | 10 | Min | F | 5 | 10 | 20 | Avg | 3:1 | 2:1 (4:1) | | |
| LZ1[j] (and LZ2 curfew) | | | 10 | 10 | 10 | Min | E | 4 | 8 | 16 | Avg | 3:1 | 2:1 (4:1) | | |
| LZ0[j] (and LZ1 curfew) | Control with motion sensors | | 10 | 10 | 10 | Min | D | 3 | 6 | 12 | Avg | 2:1 | | | |
| · Medium Activity[i] | Entries/Exits typified by periods of medium pedestrian traffic | | | | | | | | | | | | | | |
| LZ4[j] | | | 10 | 10 | 10 | Min | F | 5 | 10 | 20 | Avg | 4:1 | 2:1 | | |
| LZ3[j] (and LZ4 curfew) | | | 10 | 10 | 10 | Min | E | 4 | 8 | 16 | Avg | 4:1 | 2:1 (4:1) | | |
| LZ2[j] (and LZ3 curfew) | | | 10 | 10 | 10 | Min | D | 3 | 6 | 12 | Avg | 3:1 | 2:1 (4:1) | | |
| LZ1[j] (and LZ2 curfew) | | | 10 | 10 | 10 | Min | C | 2 | 4 | 8 | Avg | 3:1 | 2:1 (4:1) | | |
| LZ0[j] (and LZ1 curfew) | Control with motion sensors | | 10 | 10 | 10 | Min | B | 1 | 2 | 4 | Avg | 2:1 | | | |

**Table 2b: Illumination Values.**

| Applications and Tasks[a] | Notes | Recommended Maintained Illuminance Targets (lux)[b,c,d] Horizontal ($E_h$) Targets: Category | Visual Ages of Observers (years) where at least half are <25 | 25-65 | >65 | Gauge | Vertical ($E_v$) Targets: Category | Visual Ages of Observers (years) where at least half are <25 | 25-65 | >65 | Gauge | Uniformity Targets[e] Over Area of Coverage[f]: 1st ratio $E_h$/2nd ratio $E_v$ if different uniformities apply Max:Avg | Avg:Min | Max:Min | Typical Area of Coverage[g] Task Area | Area |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| • Non-covered Entries/Exits | (continued) | | | | | | | | | | | | | | | |
| • Low Activity[i] | Entries/Exits typified by periods of low pedestrian traffic | | | | | | | | | | | | | | | |
| • LZ4[j] | | | 10 | 10 | 10 | Min | E | 4 | 8 | 16 | Avg | 4:1 | 2:1 | | | |
| • LZ3[j] (and LZ4 curfew) | | | 10 | 10 | 10 | Min | D | 3 | 6 | 12 | Avg | 4:1 | 2:1 (4:1) | | | |
| • LZ2[j] (and LZ3 curfew) | | | 10 | 10 | 10 | Min | C | 2 | 4 | 8 | Avg | 3:1 | 2:1 (4:1) | | | |
| • LZ1[j] (and LZ2 curfew) | | | 10 | 10 | 10 | Min | B | 1 | 2 | 4 | Avg | 3:1 | 2:1 (4:1) | | | |
| • LZ0[j] (and LZ1 curfew) | Control with motion sensors | | 10 | 10 | 10 | Min | A | 0.5 | 1 | 2 | Avg | 2:1 | | | | |
| • Paths to Curb | | | | | | | | | | | | | | | | |
| • High activity[i] | Entry paths typified by periods of high pedestrian traffic | | | | | | | | | | | | | | | |
| • LZ4[j] | | G | 7.5 | 15 | 30 | Avg | E | 4 | 8 | 16 | Avg | | 3:1 | | | |
| • LZ3[j] (and LZ4 curfew) | | F | 5 | 10 | 20 | Avg | D | 3 | 6 | 12 | Avg | | 3:1 (6:1) | | | |
| • LZ2[j] (and LZ3 curfew) | | E | 4 | 8 | 16 | Avg | C | 2 | 4 | 8 | Avg | | 3:1 (6:1) | | | |
| • LZ1[j] (and LZ2 curfew) | | D | 3 | 6 | 12 | Avg | B | 1 | 2 | 4 | Avg | | 3:1 (6:1) | | | |
| • LZ0[j] (and LZ1 curfew) | Control with motion sensors | C | 2 | 4 | 8 | Avg | A | 0.5 | 1 | 2 | Avg | | 3:1 (6:1) | | | |
| • Medium Activity[i] | Entry paths typified by periods of medium pedestrian traffic | | | | | | | | | | | | | | | |
| • LZ4[j] | | E | 4 | 8 | 16 | Avg | C | 2 | 4 | 8 | Avg | | 3:1 | | | |
| • LZ3[j] (and LZ4 curfew) | | D | 3 | 6 | 12 | Avg | B | 1 | 2 | 4 | Avg | | 3:1 (6:1) | | | |
| • LZ2[j] (and LZ3 curfew) | | C | 2 | 4 | 8 | Avg | A | 0.5 | 1 | 2 | Avg | | 3:1 (6:1) | | | |
| • LZ1[j] (and LZ2 curfew) | | B | 1 | 2 | 4 | Avg | - | 0 | 0 | 0 | | | 3:1 (6:1) | | | |
| • LZ0[j] (and LZ1 curfew) | Control with motion sensors | A | 0.5 | 1 | 2 | Avg | - | 0 | 0 | 0 | | | 3:1 (6:1) | | | |
| • Low Activity[i] | Entry paths typified by periods of low pedestrian traffic | | | | | | | | | | | | | | | |
| • LZ4[j] | | C | 2 | 4 | 8 | Avg | C | 2 | 4 | 8 | Avg | | 3:1 | | | |
| • LZ3[j] (and LZ4 curfew) | | B | 1 | 2 | 4 | Avg | B | 1 | 2 | 4 | Avg | | 3:1 (6:1) | | | |
| • LZ2[j] (and LZ3 curfew) | | A | 0.5 | 1 | 2 | Avg | A | 0.5 | 1 | 2 | Avg | | 3:1 (6:1) | | | |
| • LZ1[j] (and LZ2 curfew) | | A | 0.5 | 1 | 2 | Avg | - | 0 | 0 | 0 | | | 3:1 (6:1) | | | |
| • LZ0[j] (and LZ1 curfew) | Control with motion sensors | A | 0.5 | 1 | 2 | Avg | - | 0 | 0 | 0 | | | 3:1 (6:1) | | | |
| • Porte Cocheres | $E_h$ @grade; $E_v$ @5' AFG in directions of ingress/egress and security camera | | | | | | | | | | | | | | | |
| • High Activity[i] | Porte cocheres typified by periods of high pedestrian and vehicular traffic | | | | | | | | | | | | | | | |
| • LZ4[j] | | L | 37.5 | 75 | 150 | Avg | J | 20 | 40 | 80 | Avg | | 2:1 | | | |
| • LZ3[j] (and LZ4 curfew) | | K | 25 | 50 | 100 | Avg | I | 15 | 30 | 60 | Avg | | 2:1 (4:1) | | | |
| • LZ2[j] (and LZ3 curfew) | | J | 20 | 40 | 80 | Avg | H | 10 | 20 | 40 | Avg | | 2:1 (4:1) | | | |
| • LZ1[j] (and LZ2 curfew) | | H | 10 | 20 | 40 | Avg | G | 7.5 | 15 | 30 | Avg | | 2:1 (4:1) | | | |
| • LZ0[j] (and LZ1 curfew) | Control with motion sensors | G | 7.5 | 15 | 30 | Avg | F | 5 | 10 | 20 | Avg | | 2:1 (4:1) | | | |
| • Medium Activity[i] | Porte cocheres typified by periods of medium pedestrian and vehicular traffic | | | | | | | | | | | | | | | |
| • LZ4[j] | | J | 20 | 40 | 80 | Avg | H | 10 | 20 | 40 | Avg | | 2:1 | | | |
| • LZ3[j] (and LZ4 curfew) | | I | 15 | 30 | 60 | Avg | G | 7.5 | 15 | 30 | Avg | | 2:1 (4:1) | | | |
| • LZ2[j] (and LZ3 curfew) | | H | 10 | 20 | 40 | Avg | F | 5 | 10 | 20 | Avg | | 2:1 (4:1) | | | |
| • LZ1[j] (and LZ2 curfew) | | G | 7.5 | 15 | 30 | Avg | E | 4 | 8 | 16 | Avg | | 2:1 (4:1) | | | |
| • LZ0[j] (and LZ1 curfew) | Control with motion sensors | F | 5 | 10 | 20 | Avg | D | 3 | 6 | 12 | Avg | | 2:1 (4:1) | | | |
| • Low Activity[i] | Porte cocheres typified by periods of low pedestrian and vehicular traffic | | | | | | | | | | | | | | | |
| • LZ4[j] | | H | 10 | 20 | 40 | Avg | F | 5 | 10 | 20 | Avg | | 2:1 | | | |
| • LZ3[j] (and LZ4 curfew) | | G | 7.5 | 15 | 30 | Avg | E | 4 | 8 | 16 | Avg | | 2:1 (4:1) | | | |
| • LZ2[j] (and LZ3 curfew) | | F | 5 | 10 | 20 | Avg | D | 3 | 6 | 12 | Avg | | 2:1 (4:1) | | | |

**Table 2c: Illumination Values.**

| Applications and Tasks[a] | Notes | Recommended Maintained Illuminance Targets (lux)[b,c,d] Horizontal ($E_h$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Gauge | Vertical ($E_v$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Gauge | Uniformity Targets[e] Over Area of Coverage[f]: 1st ratio $E_h$/2nd ratio $E_v$ if different uniformities apply Max:Avg | Avg:Min | Max:Min | Typical Area of Coverage[g] Task Area | Area |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Category | | | | Category | | | | | | | | | |
| • Porte Cocheres | (continued) | | | | | | | | | | | | | | |
| · LZ1[i] (and LZ2 curfew) | | E | 4 | 8 | 16 | Avg | C | 2 | 4 | 8 | Avg | | 2:1 (4:1) | | |
| · LZ0[i] (and LZ1 curfew) | Control with motion sensors | D | 3 | 6 | 12 | Avg | B | 1 | 2 | 4 | Avg | | 2:1 (4:1) | | |
| • Site Gated Entries | | | | | | | | | | | | | | | |
| · Manned | | | | | | | | | | | | | | | |
| · Pedestrians | | | | | | | | | | | | | | | |
| · Credentialing area | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | F | 5 | 10 | 20 | Avg | F | 5 | 10 | 20 | Avg | 2:1 | 2:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | E | 4 | 8 | 16 | Avg | E | 4 | 8 | 16 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | D | 3 | 6 | 12 | Avg | D | 3 | 6 | 12 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | C | 2 | 4 | 8 | Avg | B | 1 | 2 | 4 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ0[i] (and LZ1 curfew) | | B | 1 | 2 | 4 | Avg | A | 0.5 | 1 | 2 | Avg | 2:1 | 2:1 (4:1) | | |
| · General area | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | D | 3 | 6 | 12 | Avg | D | 3 | 6 | 12 | Avg | 3:1 | 3:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | C | 2 | 4 | 8 | Avg | C | 2 | 4 | 8 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | B | 1 | 2 | 4 | Avg | B | 1 | 2 | 4 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @3' AFG; $E_v$ @3'-5' AFG | B | 1 | 2 | 4 | Avg | A | 0.5 | 1 | 2 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ0[i] (and LZ1 curfew) | | A | 0.5 | 1 | 2 | Avg | - | 0 | 0 | 0 | | 3:1 | 3:1 (6:1) | | |
| · Vehicles | | | | | | | | | | | | | | | |
| · Cars and light trucks | $E_v$ at height range representing windshield and driver's side window elevations for most cars and light trucks. | | | | | | | | | | | | | | |
| Credentialing area | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @4' AFG; $E_v$ @3'-5' AFG | H | 10 | 20 | 40 | Avg | G | 7.5 | 15 | 30 | Avg | 2:1 | 2:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @4' AFG; $E_v$ @3'-5' AFG | G | 7.5 | 15 | 30 | Avg | F | 5 | 10 | 20 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @4' AFG; $E_v$ @3'-5' AFG | F | 5 | 10 | 20 | Avg | E | 4 | 8 | 16 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @4' AFG; $E_v$ @3'-5' AFG | E | 4 | 8 | 16 | Avg | D | 3 | 6 | 12 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ0[i] (and LZ1 curfew) | | D | 3 | 6 | 12 | Avg | C | 2 | 4 | 8 | Avg | 2:1 | 2:1 (4:1) | | |
| General area | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @5' AFG; $E_v$ @3'-5' AFG | F | 5 | 10 | 20 | Avg | F | 5 | 10 | 20 | Avg | 3:1 | 3:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @5' AFG; $E_v$ @3'-5' AFG | E | 4 | 8 | 16 | Avg | E | 4 | 8 | 16 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @5' AFG; $E_v$ @3'-5' AFG | D | 3 | 6 | 12 | Avg | D | 3 | 6 | 12 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @5' AFG; $E_v$ @3'-5' AFG | C | 2 | 4 | 8 | Avg | B | 1 | 2 | 4 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ0[i] (and LZ1 curfew) | | B | 1 | 2 | 4 | Avg | A | 0.5 | 1 | 2 | Avg | 3:1 | 3:1 (6:1) | | |
| · Commercial vans/trucks | $E_v$ at height range representing windshield and driver's side window elevations for most commercial vans and trucks. | | | | | | | | | | | | | | |
| Credentialing area | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @8' AFG; $E_v$ @6'-9' AFG | H | 10 | 20 | 40 | Avg | G | 7.5 | 15 | 30 | Avg | 2:1 | 2:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @8' AFG; $E_v$ @6'-9' AFG | G | 7.5 | 15 | 30 | Avg | F | 5 | 10 | 20 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @8' AFG; $E_v$ @6'-9' AFG | F | 5 | 10 | 20 | Avg | E | 4 | 8 | 16 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @8' AFG; $E_v$ @6'-9' AFG | E | 4 | 8 | 16 | Avg | D | 3 | 6 | 12 | Avg | 2:1 | 2:1 (4:1) | | |
| LZ0[i] (and LZ1 curfew) | | D | 3 | 6 | 12 | Avg | C | 2 | 4 | 8 | Avg | 2:1 | 2:1 (4:1) | | |
| General area | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @10' AFG; $E_v$ @6'-9' AFG | F | 5 | 10 | 20 | Avg | F | 5 | 10 | 20 | Avg | 3:1 | 3:1 | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @10' AFG; $E_v$ @6'-9' AFG | E | 4 | 8 | 16 | Avg | E | 4 | 8 | 16 | Avg | 3:1 | 3:1 (6:1) | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @10' AFG; $E_v$ @6'-9' AFG | D | 3 | 6 | 12 | Avg | D | 3 | 6 | 12 | Avg | 3:1 | 3:1 (6:1) | | |

**Table 2d: Illumination Values.**

| Applications and Tasks[a] | Notes | Recommended Maintained Illuminance Targets (lux)[b,c,d] — Horizontal ($E_h$) Targets — Visual Ages of Observers (years) where **at least half** are | | | | | Vertical ($E_v$) Targets — Visual Ages of Observers (years) where **at least half** are | | | | | Uniformity Targets[e] Over Area of Coverage [f] — 1st ratio $E_h$/2nd ratio $E_v$ if different uniformities apply | | | Typical Area of Coverage[g] | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Category | <25 | 25-65 | >65 | Gauge | Category | <25 | 25-65 | >65 | Gauge | Max:Avg | Avg:Min | Max:Min | Task Area | Area |
| • Site Gated Entries | (continued) | | | | | | | | | | | | | | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @10' AFG; $E_v$ @6'-9' AFG | C | 2 | 4 | 8 | Avg | B | 1 | 2 | 4 | Avg | 3:1 | 3:1 (6:1) | | | |
| LZ0[i] (and LZ1 curfew) | | B | 1 | 2 | 4 | Avg | A | 0.5 | 1 | 2 | Avg | 3:1 | 3:1 (6:1) | | | |
| • Remote Monitored | | | | | | | | | | | | | | | | |
| · Intercom call system | Highlight intercom call system unless internally illuminated. Coordinate lighting with camera location to avoid image washout. | | | | | | | | | | | | | | | |
| LZ4[i] | $E_v$ on system hardware. | | | | | | G | 7.5 | 15 | 30 | Avg | 2:1 | 2:1 | | | |
| LZ3[i] (and LZ4 curfew) | $E_v$ on system hardware. | | | | | | F | 5 | 10 | 20 | Avg | 2:1 | 2:1 (4:1) | | | |
| LZ2[i] (and LZ3 curfew) | $E_v$ on system hardware. | | | | | | E | 4 | 8 | 16 | Avg | 2:1 | 2:1 (4:1) | | | |
| LZ1[i] (and LZ2 curfew) | $E_v$ on system hardware. | | | | | | D | 3 | 6 | 12 | Avg | 2:1 | 2:1 (4:1) | | | |
| LZ0[i] (and LZ1 curfew) | | | | | | | C | 2 | 4 | 8 | Avg | 2:1 | 2:1 (4:1) | | | |
| · Pedestrians | | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @3' AFG; $E_v$ @5' AFG | G | 7.5 | 15 | 30 | Avg | F | 5 | 10 | 20 | Avg | 2:1 | 2:1 | | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @3' AFG; $E_v$ @5' AFG | F | 5 | 10 | 20 | Avg | E | 4 | 8 | 16 | Avg | 2:1 | 2:1 (4:1) | | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @3' AFG; $E_v$ @5' AFG | E | 4 | 8 | 16 | Avg | D | 3 | 6 | 12 | Avg | 2:1 | 2:1 (4:1) | | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @3' AFG; $E_v$ @5' AFG | D | 3 | 6 | 12 | Avg | C | 2 | 4 | 8 | Avg | 2:1 | 2:1 (4:1) | | | |
| · Vehicles | | | | | | | | | | | | | | | | |
| LZ4[i] | $E_v$ on system hardware. | I | 15 | 30 | 60 | Avg | H | 10 | 20 | 40 | Avg | 2:1 | 2:1 | | | |
| LZ3[i] (and LZ4 curfew) | $E_v$ on system hardware. | H | 10 | 20 | 40 | Avg | G | 7.5 | 15 | 30 | Avg | 2:1 | 2:1 (4:1) | | | |
| LZ2[i] (and LZ3 curfew) | $E_v$ on system hardware. | G | 7.5 | 15 | 30 | Avg | F | 5 | 10 | 20 | Avg | 2:1 | 2:1 (4:1) | | | |
| LZ1[i] (and LZ2 curfew) | $E_v$ on system hardware. | F | 5 | 10 | 20 | Avg | E | 4 | 8 | 16 | Avg | 2:1 | 2:1 (4:1) | | | |
| LZ0[i] (and LZ1 curfew) | | E | 4 | 8 | 16 | Avg | D | 3 | 6 | 12 | Avg | 2:1 | 2:1 (4:1) | | | |
| • Unmanned/unmonitored | | | | | | | | | | | | | | | | |
| · Intercom call system access | Highlight security call system unless internally illuminated. | | | | | | | | | | | | | | | |
| LZ4[i] | $E_v$ on system hardware, unless self-illuminated | | | | | | H | 10 | 20 | 40 | Avg | | 2:1 | | | |
| LZ3[i] (and LZ4 curfew) | $E_v$ on system hardware, unless self-illuminated | | | | | | G | 7.5 | 15 | 30 | Avg | | 2:1 | | | |
| LZ2[i] (and LZ3 curfew) | $E_v$ on system hardware, unless self-illuminated | | | | | | F | 5 | 10 | 20 | Avg | | 2:1 | | | |
| LZ1[i] (and LZ2 curfew) | $E_v$ on system hardware, unless self-illuminated | | | | | | E | 4 | 8 | 16 | Avg | | 2:1 | | | |
| LZ0[i] (and LZ1 curfew) | | | | | | | D | 3 | 6 | 12 | Avg | | 2:1 | | | |
| · Pedestrians | Lighting should address an area 5' by 5' centered on the intercom call system. | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @grade | E | 4 | 8 | 16 | Avg | | | | | | 2:1 | 3:1 | | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @grade | D | 3 | 6 | 12 | Avg | | | | | | 2:1 | 3:1 (6:1) | | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @grade | C | 2 | 4 | 8 | Avg | | | | | | 2:1 | 3:1 (6:1) | | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @grade | B | 1 | 2 | 4 | Avg | | | | | | 2:1 | 3:1 (6:1) | | | |
| LZ0[i] (and LZ1 curfew) | | A | 0.5 | 1 | 2 | Avg | | | | | | 2:1 | 3:1 (6:1) | | | |
| · Vehicles | Lighting should address an area 5' by 5' centered on the intercom call system. | | | | | | | | | | | | | | | |
| LZ4[i] | $E_h$ @grade | F | 5 | 10 | 20 | Avg | | | | | | 2:1 | 3:1 | | | |
| LZ3[i] (and LZ4 curfew) | $E_h$ @grade | E | 4 | 8 | 16 | Avg | | | | | | 2:1 | 3:1 (6:1) | | | |
| LZ2[i] (and LZ3 curfew) | $E_h$ @grade | D | 3 | 6 | 12 | Avg | | | | | | 2:1 | 3:1 (6:1) | | | |
| LZ1[i] (and LZ2 curfew) | $E_h$ @grade | C | 2 | 4 | 8 | Avg | | | | | | 2:1 | 3:1 (6:1) | | | |
| LZ0[i] (and LZ1 curfew) | | B | 1 | 2 | 4 | Avg | | | | | | 2:1 | 3:1 (6:1) | | | |

**Table 2e: Illumination Values.**

| Applications and Tasks[a] | Notes | Recommended Maintained Illuminance Targets (lux)[b,c,d] Horizontal ($E_h$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Category | Gauge | Vertical ($E_v$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Gauge | Uniformity Targets[e] Over Area of Coverage [f]: 1st ratio $E_h$/2nd ratio $E_v$ if different uniformities apply: Max:Avg | Avg:Min | Max:Min | Typical Area of Coverage[g]: Task Area | Area |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **FACADES** | | | | | | | | | | | | | | | |
| • Facade Details or Features | **Key elements or details. Apply strategically to ≤25% of area of building facade. Uniformity ratios are cited here as guides when relatively uniform appearance is desired over the area of application.** | | | | | | | | | | | | | | |
| • With Surface Reflectance ≥0.5 | **Lighter-toned facade materials** | | | | | | | | | | | | | | |
| • High Activity[i] | | | | | | | | | | | | | | | |
| • LZ4[j] | **Apply strategically to ≤25% of area of building facade.** | | | | O | | 100 | 200 | 400 | Max | | | | | |
| • LZ3[j] (and LZ4 curfew) | **Apply strategically to ≤20% of area of building facade.** | | | | N | | 75 | 150 | 300 | Max | | | | | |
| • LZ2[j] (and LZ3 curfew) | **Apply strategically to ≤15% of area of building facade.** | | | | M | | 50 | 100 | 200 | Max | | | | | |
| • LZ1[j] (and LZ2 curfew) | **Apply strategically to ≤10% of area of building facade.** | | | | L | | 37.5 | 75 | 150 | Max | | | | | |
| • LZ0[j] (and LZ1 curfew) | | | | | - | | 0 | 0 | 0 | | | | | | |
| • Medium Activity[i] | | | | | | | | | | | | | | | |
| • LZ4[j] | **Apply strategically to ≤25% of area of building facade.** | | | | M | | 50 | 100 | 200 | Max | | | | | |
| • LZ3[j] (and LZ4 curfew) | **Apply strategically to ≤20% of area of building facade.** | | | | L | | 37.5 | 75 | 150 | Max | | | | | |
| • LZ2[j] (and LZ3 curfew) | **Apply strategically to ≤15% of area of building facade.** | | | | K | | 25 | 50 | 100 | Max | | | | | |
| • LZ1[j] (and LZ2 curfew) | **Apply strategically to ≤10% of area of building facade.** | | | | J | | 20 | 40 | 80 | Max | | | | | |
| • LZ0[j] (and LZ1 curfew) | | | | | - | | 0 | 0 | 0 | | | | | | |
| • Low Activity[i] | | | | | | | | | | | | | | | |
| • LZ4[j] | **Apply strategically to ≤25% of area of building facade.** | | | | K | | 25 | 50 | 100 | Max | | | | | |
| • LZ3[j] (and LZ4 curfew) | **Apply strategically to ≤20% of area of building facade.** | | | | J | | 20 | 40 | 80 | Max | | | | | |
| • LZ2[j] (and LZ3 curfew) | **Apply strategically to ≤15% of area of building facade.** | | | | I | | 15 | 30 | 60 | Max | | | | | |
| • LZ1[j] (and LZ2 curfew) | **Apply strategically to ≤10% of area of building facade.** | | | | H | | 10 | 20 | 40 | Max | | | | | |
| • LZ0[j] (and LZ1 curfew) | | | | | - | | 0 | 0 | 0 | | | | | | |
| • With Surface Reflectance <0.5 | **Darker-toned facade materials** | | | | | | | | | | | | | | |
| • LZ4[j] | **Apply strategically to ≤25% of area of building facade.** | | | | Q | | 200 | 400 | 800 | Max | | | | | |
| • LZ3[j] (and LZ4 curfew) | **Apply strategically to ≤20% of area of building facade.** | | | | P | | 150 | 300 | 600 | Max | | | | | |
| • LZ2[j] (and LZ3 curfew) | **Apply strategically to ≤15% of area of building facade.** | | | | O | | 100 | 200 | 400 | Max | | | | | |
| • LZ1[j] (and LZ2 curfew) | **Apply strategically to ≤10% of area of building facade.** | | | | N | | 75 | 150 | 300 | Max | | | | | |
| • LZ0[j] (and LZ1 curfew) | | | | | - | | 0 | 0 | 0 | | | | | | |
| • Medium Activity[i] | | | | | | | | | | | | | | | |
| • LZ4[j] | **Apply strategically to ≤25% of area of building facade.** | | | | O | | 100 | 200 | 400 | Max | | | | | |
| • LZ3[j] (and LZ4 curfew) | **Apply strategically to ≤20% of area of building facade.** | | | | N | | 75 | 150 | 300 | Max | | | | | |
| • LZ2[j] (and LZ3 curfew) | **Apply strategically to ≤15% of area of building facade.** | | | | M | | 50 | 100 | 200 | Max | | | | | |
| • LZ1[j] (and LZ2 curfew) | **Apply strategically to ≤10% of area of building facade.** | | | | L | | 37.5 | 75 | 150 | Max | | | | | |
| • LZ0[j] (and LZ1 curfew) | | | | | - | | 0 | 0 | 0 | | | | | | |
| • Low Activity[i] | | | | | | | | | | | | | | | |
| • LZ4[j] | **Apply strategically to ≤25% of area of building facade.** | | | | M | | 50 | 100 | 200 | Max | | | | | |
| • LZ3[j] (and LZ4 curfew) | **Apply strategically to ≤20% of area of building facade.** | | | | L | | 37.5 | 75 | 150 | Max | | | | | |
| • LZ2[j] (and LZ3 curfew) | **Apply strategically to ≤15% of area of building facade.** | | | | K | | 25 | 50 | 100 | Max | | | | | |
| • LZ1[j] (and LZ2 curfew) | **Apply strategically to ≤10% of area of building facade.** | | | | J | | 20 | 40 | 80 | Max | | | | | |
| • LZ0[j] (and LZ1 curfew) | | | | | - | | 0 | 0 | 0 | | | | | | |

**Table 2f: Illumination Values.**

| Applications and Tasks[a] | Notes | Recommended Maintained Illuminance Targets (lux)[b,c,d] Horizontal ($E_h$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Vertical ($E_v$) Targets: Visual Ages of Observers (years) where **at least half** are <25 | 25-65 | >65 | Uniformity Targets[e] Over Area of Coverage [f]: 1st ratio $E_h$/2nd ratio $E_v$ if different uniformities apply: Max:Avg | Avg:Min | Max:Min | Typical Area of Coverage[g]: Task Area | Area |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Category | | Gauge | Category | | Gauge | | | | | |
| **FACADES** | **Facade Details or Features (continued)** | | | | | | | | | | | |
| • Facade Fields | **Relatively large areas of facade or entire facade. Uniformity ratios are cited here as guides when relatively uniform appearance is desired over the area of application.** | | | | | | | | | | | |
| • With Surface Reflectance ≥0.5 | **Lighter-toned facade materials** | | | | | | | | | | | |
| • High Activity[i] | | | | | | | | | | | | |
| • LZ4[j] | | | | | L | 37.5 | 75 | 150 | Avg | 3:1 | 10:1 | |
| • LZ3[j] (and LZ4 curfew) | | | | | K | 25 | 50 | 100 | Avg | 3:1 | 10:1 | |
| • LZ2[j] (and LZ3 curfew) | | | | | J | 20 | 40 | 80 | Avg | 3:1 | 10:1 | |
| • LZ1[j] (and LZ2 curfew) | | | | | I | 15 | 30 | 60 | Avg | 3:1 | 10:1 | |
| • LZ0[j] (and LZ1 curfew) | | | | | - | 0 | 0 | 0 | | | | |
| • Medium Activity[i] | | | | | | | | | | | | |
| • LZ4[j] | | | | | J | 20 | 40 | 80 | Avg | 3:1 | 10:1 | |
| • LZ3[j] (and LZ4 curfew) | | | | | I | 15 | 30 | 60 | Avg | 3:1 | 10:1 | |
| • LZ2[j] (and LZ3 curfew) | | | | | H | 10 | 20 | 40 | Avg | 3:1 | 10:1 | |
| • LZ1[j] (and LZ2 curfew) | | | | | G | 7.5 | 15 | 30 | Avg | 3:1 | 10:1 | |
| • LZ0[j] (and LZ1 curfew) | | | | | - | 0 | 0 | 0 | | | | |
| • Low Activity[i] | | | | | | | | | | | | |
| • LZ4[j] | | | | | H | 10 | 20 | 40 | Avg | 3:1 | 10:1 | |
| • LZ3[j] (and LZ4 curfew) | | | | | G | 7.5 | 15 | 30 | Avg | 3:1 | 10:1 | |
| • LZ2[j] (and LZ3 curfew) | | | | | F | 5 | 10 | 20 | Avg | 3:1 | 10:1 | |
| • LZ1[j] (and LZ2 curfew) | | | | | E | 4 | 8 | 16 | Avg | 3:1 | 10:1 | |
| • LZ0[j] (and LZ1 curfew) | | | | | - | 0 | 0 | 0 | | | | |
| • With Surface Reflectance <0.5 | **Darker-toned facade materials** | | | | | | | | | | | |
| • LZ4[j] | | | | | N | 75 | 150 | 300 | Avg | 3:1 | 10:1 | |
| • LZ3[j] (and LZ4 curfew) | | | | | M | 50 | 100 | 200 | Avg | 3:1 | 10:1 | |
| • LZ2[j] (and LZ3 curfew) | | | | | L | 37.5 | 75 | 150 | Avg | 3:1 | 10:1 | |
| • LZ1[j] (and LZ2 curfew) | | | | | K | 25 | 50 | 100 | Avg | 3:1 | 10:1 | |
| • LZ0[j] (and LZ1 curfew) | | | | | - | 0 | 0 | 0 | | | | |
| • Medium Activity[i] | | | | | | | | | | | | |
| • LZ4[j] | | | | | L | 37.5 | 75 | 150 | Avg | 3:1 | 10:1 | |
| • LZ3[j] (and LZ4 curfew) | | | | | K | 25 | 50 | 100 | Avg | 3:1 | 10:1 | |
| • LZ2[j] (and LZ3 curfew) | | | | | J | 20 | 40 | 80 | Avg | 3:1 | 10:1 | |
| • LZ1[j] (and LZ2 curfew) | | | | | I | 15 | 30 | 60 | Avg | 3:1 | 10:1 | |
| • LZ0[j] (and LZ1 curfew) | | | | | - | 0 | 0 | 0 | | | | |
| • Low Activity[i] | | | | | | | | | | | | |
| • LZ4[j] | | | | | J | 20 | 40 | 80 | Avg | 3:1 | 10:1 | |
| • LZ3[j] (and LZ4 curfew) | | | | | I | 15 | 30 | 60 | Avg | 3:1 | 10:1 | |
| • LZ2[j] (and LZ3 curfew) | | | | | H | 10 | 20 | 40 | Avg | 3:1 | 10:1 | |
| • LZ1[j] (and LZ2 curfew) | | | | | G | 7.5 | 15 | 30 | Avg | 3:1 | 10:1 | |
| • LZ0[j] (and LZ1 curfew) | | | | | - | 0 | 0 | 0 | | | | |

**Notes for Table 2.**

**Notes**

The table column headings are discussed in detail in the Illuminance Criteria Section. Refer to the discussion on procedures for establishing illuminance targets for a project.

**a.** Applications, tasks, or viewing specifics encountered on any given project may be different from these and may warrant different criteria. Refer to IES Lighting Handbook, Section 29.3.1 Applications and Tasks. The designer is responsible for making final determinations of applications, tasks, and illuminance criteria. Outdoor tasks are so noted.

**b.** Values cited are to be maintained over time on the area of coverage.

**c.** Values cited are consensus and deemed appropriate for respective functional activity. In a few situations, code requirements are within 10% of IES recommendations. This is apparently an artifact of metrification. Footcandle conversions of any values cited in this table should be made at 1 fc to 10 lx. Regardless, codes, ordinances, or mandates may supersede any of the IES criteria for any of the applications and tasks and the designer must design accordingly.

**d.** Targets are intended to apply to the respective plane or planes of the task.

**e.** Illuminance uniformity targets offer best results when planned in conjunction with luminance ratios and surface reflectances. Any parenthetical uniformity values reference respective parenthetical applications or tasks, such as a curfew situation associated with nighttime outdoor lighting.

**f.** Applications and tasks cited with a sunburst icon are candidates for strategies employing any combination of daylighting and electric lighting to achieve target values during daylight hours. Daylighting may require unconventional approaches.

**g.** The designer must establish areas of coverage to which targets apply. Green highlight identifies task proper or task area as the typical area of coverage for respective cited targets. Amber highlight identifies room or designated areas as the typical area of coverage for respective cited targets.

**h.** Nighttime illuminance targets are intended for application during dark hours of operations where lighting is deemed necessary or desirable. At curfew (client-or-jurisdiction-defined), if lighting is still deemed necessary or desirable, then reduce lighting as indicated.

**i.** See IES Lighting Handbook, 10th Edition, Table 22.4 - Indoor and Nighttime Outdoor Activity Level Definitions.

**j.** See IES Lighting Handbook, 10th Edition, Table 26.4 Nighttime Outdoor Lighting Zone Definitions. Nighttime illuminance targets are intended for application during dark hours of operation where lighting is deemed necessary or desirable. At curfew (client or jurisdiction defined), if lighting is still deemed necessary or desirable, then reduce lighting as indicated. See IES Lighting Handbook, 10th Edition, Table 26.5 Recommended Light Trespass Illuminance Limits.

# Appendix 6

**IES Sport and Recreational Area Lighting**
**Lighting for Outdoor Sports, 8.10 Football and 8.27 Soccer**

IES Sport and Recreational Area Lighting Committee, *Sports and Recreational Area Lighting*, RP-6-15. New York: Illuminating Engineering Society, 2015.

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# IES RP-6-15

# Sports and Recreational Area Lighting

Publication of this Recommended Practice
has been approved by IES.
Suggestions for revisions
should be directed to IES.

Prepared by:
The Sports and Recreational Area Lighting Committee of
the Illuminating Engineering Society of North America

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directional ground level sports the playing object is aimed at a fixed target near ground level (usually the target is in a vertical position). Vertical illuminance is critical at the target. It is normally provided by aiming luminaires (shielded from the players and spectators field of view) toward the target.

### 4.2 Players Skill and Performance

As the skill and performance of players increase, speed and accuracy also increases which in turn calls for higher illuminance levels and/or higher contrasts between the target and the background.

Visual targets (i.e., balls or pucks) of various sports are played at a wide range of speeds against various luminances and color backgrounds. In general, when the visual target is small, the difficulty of the seeing task increases. When the target travels at high speed and is viewed at close range, such as baseball, tennis, and racquetball, higher illuminance levels are required. However, when a golf ball is traveling in the air at high speed, its relative speed with respect to the observer is slow. Thus, lower illuminance levels are adequate for golf driving ranges and similar applications.

### 4.3 Spectators

Many sports are performed in the presence of spectators, particularly at high skill levels. As the number of spectators increases, seating becomes more remote from the playing area. The size of the visual target is then diminished in proportion to the square of the distance. This requires increased illuminance to compensate for the visual difficulty for the spectator. For large sport stadiums, illuminance is determined by the lighting required for the spectators seated farthest from the playing area. This condition may require several times the illuminance level found to be sufficient to the sport.

### 4.4 Classification of Play

The required quantity and quality of illuminance for a particular sport varies depending on the participant's skill level, age and the number of spectators attending the event. Additional considerations may include any requirements by individual sports organizations, video broadcasting, or TV broadcast.
In general, as the skill level is elevated, players and spectators require a better and more sophisticated luminous environment. A correlation exists between the size of a facility and the level of play; for example, a higher skill level attracts a greater number of spectators. In addition, a higher skill level may also have faster play, requiring increased illumination levels for the players, spectators, and broadcasting.

As the number of spectators increases, their distance from the playing surface increases; as a result, their need for higher illuminance to see players and tasks also increases. Accordingly, facilities should be designed to satisfy the most talented players and accommodate the greatest potential spectator capacity. It is important to note that in large facilities which seat over 5,000 spectators the lighting criteria are usually governed by the needs of television broadcasting requirements. Recommendations for such facilities are not covered in detail in this publication. To determine illumination criteria, this chapter groups facilities into four classes based on the skill levels of the players and the anticipated number of spectators.

- ***Class I*** *- Competition play before a large group (5000 or more spectators). Lighting criteria for major stadiums and arenas require special design considerations such as vertical and horizontal illuminance values not covered by this practice, which may be defined by individual sports governing bodies and/or broadcasting organizations.*

- ***Class II*** *- Competition play with facilities for up to 5000 spectators.*
- ***Class III*** *- Competition play with facilities for up to 2,000 spectators.*
- ***Class IV*** *- Competition or recreational play only (limited or no provision for spectators).*

Class IV lighting levels are suitable for play at fields that do not draw a large number of spectators. Many fields that host competitive play for adult recreational leagues will have very few spectators. Games for youth leagues will typically only be attended by family members of the participants.

| FACILITY | CLASS | | | |
|---|---|---|---|---|
| | I | II | III | IV |
| Professional | X | | | |
| College | X | X | | |
| Semi-Professional | X | X | | |
| Sports Clubs | X | X | X | |
| Amateaur Leagues | | X | X | X |
| High School | | X | X | X |
| Training Facilities | | | X | X |
| Elementary School | | | | X |
| Receational Event | | | | X |
| Social Event | | | | X |

Class I: Facilities with spectator capacity over 5,000
Class II: Facilities with spectator capacity under 5,000
Class III: Facilities with some provision for spectators
Class IV: Facilities with limited or no provision for spectators

**Table 2: Class of Play**

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Luminaire aiming should be from perpendicular to, or in the direction of travel, whenever possible to prevent disability glare for participants. Also, it is critical that the driver has an unhampered view of the staging lights at the starting line.

**8.9.1 Field Hockey** Field hockey is a multi-directional ground-level sport played at moderate speed with a ball approximately the size of a baseball.

Pole arrangements are similar to football. Spacing of poles should be proportionally similar starting from the end line.

Recommended illuminance levels are:

***Class II*** *- Horizontal illuminance: 500 lux. (50 fc.)*
*CV = 0.21 or less. ($E_{max}/E_{min}$ = 2.5:1 or less)*

***Class III*** *- Horizontal illuminance: 300 lux. (30 fc.)*
*CV = 0.25 or less. ($E_{max}/E_{min}$ = 3:1 or less)*

***Class IV*** *- Horizontal illuminance: 200 lux. (20 fc.)*
*CV = 0.30 or less. ($E_{max}/E_{min}$ = 4:1 or less)*

*Illuminance readings should be taken at a 1m (3') elevation on a 9m x 9m (30' x 30') grid.*

## 8.10 Football

Football is a multi-directional sport that combines aerial and ground play. The entire area should be uniformly illuminated. Canadian football is similar to American football with slightly different rules and field dimensions. Illuminance criteria and design considerations are similar.

**Figure 46: High School Football Field with 4 Pole Layout.**

Typical pole quantities vary from 4 – 8 poles. Poles should be set back behind the bleachers so spectator views are not obstructed. Locating poles in the corners of major stadiums is also an acceptable method, thus avoiding the long setback behind the grandstands. The main drawback to using a four pole layout is the need for taller poles and longer aiming throws for the floodlights. The height, offset and setback of pols may also be determined via stadium and site configurations.

Recommended illuminance levels are:

***Class I*** *- Horizontal illuminance: 1000 lux. (100 fc.)*
*CV = 0.13 or less. ($E_{max}/E_{min}$ = 1.7:1 or less)*

***Class II*** *- Horizontal illuminance: 500 lux. (50 fc.)*
*CV = 0.17 or less. ($E_{max}/E_{min}$ = 2.0:1 or less)*

***Class III*** *- Horizontal illuminance: 300 lux. (30 fc.)*
*CV = 0.21 or less. ($E_{max}/E_{min}$ = 2.5:1 or less)*

***Class IV*** *- Horizontal illuminance: 200 lux. (20 fc.)*
*CV = 0.25 or less. ($E_{max}/E_{min}$ = 3:1 or less)*

*Illuminance readings should be taken at a 1m (3') elevation on a 9m x 9m (30' x 30') grid.*

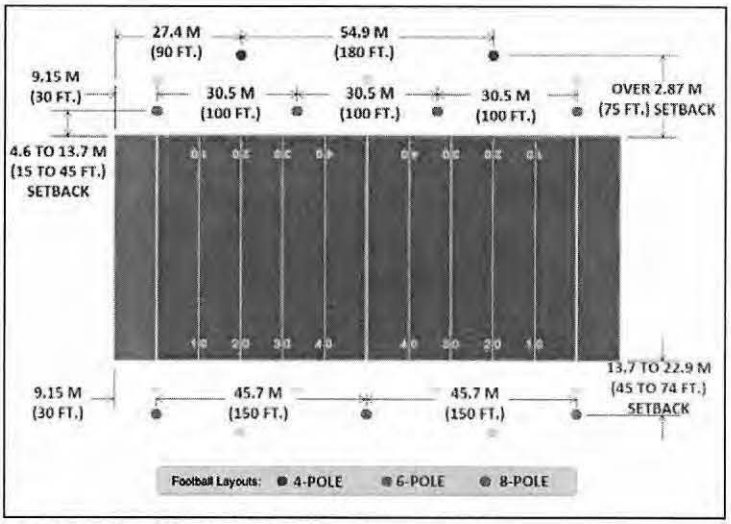


**Figure 47: Football Typical Pole Layouts.**

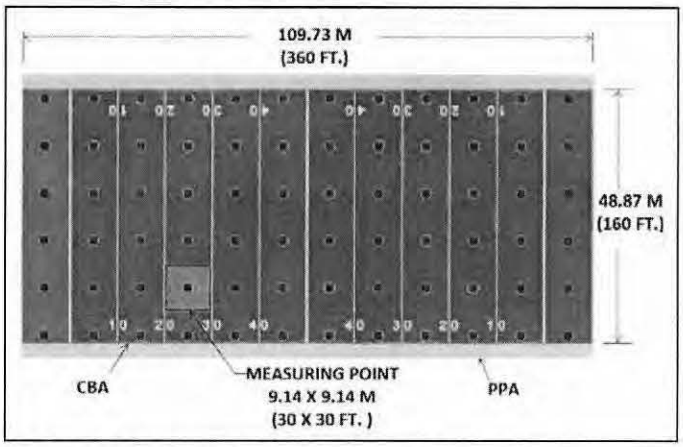


**Figure 48: Football calculation grid layout.**

## 8.11 Golf Courses

Golf is fundamentally a unidirectional and an aerial sport. The playing is divided into three separate parts: tee box, fairway, and green. The sport includes recreational and televised professional levels of play but night time play is limited to recreational levels. Recommendations for lighting are for participants only. The length of the golf holes

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this section are based on the guide lines developed by the National Ski Areas Association (NSAA) in association with the IES as shown in **Figure 73**.

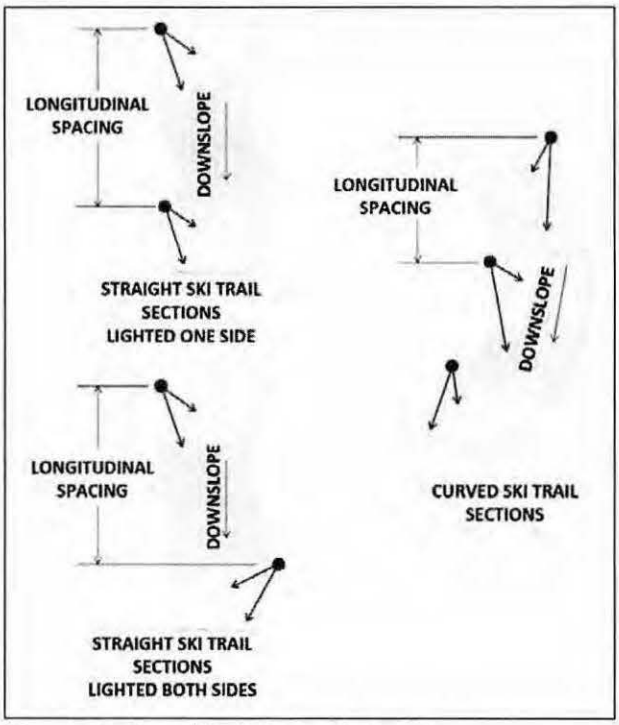


**Figure 73: Downhill Skiing pole locations.**

Vertical illuminance calculation should be undertaken at 1 meter (3.3') above the slope with the light meter pointing up the slope.

Uniform illuminance on all surfaces is not essential, and in fact, the terrain will be made more visible by the directionality of the light and its non-uniformity within the above parameters. Semi-directional illumination provides shading and modeling which aids in seeing the ski slope.

At ski areas where foggy conditions are common, it may be desirable to increase the minimum illuminance design to 3 lux (.3 fc). This will compensate for snowy or foggy conditions.

High pressure sodium is sometimes used for improved color contrast.

Aiming is generally a function of ski slope width, curvature and gradient. Aiming of luminaires should be in the general downhill direction (the direction of travel of the skier). Certain slope conditions and layouts may require aiming of luminaires other than downhill. Care should be used in aiming luminaires so as to minimize white-out and glare.

The effective pole height is used to determine longitudinal pole spacing. On slopes, the effective pole height should be as illustrated in **Figure 74**. This includes pole height above snow, snow depth and vertical differential between poles.

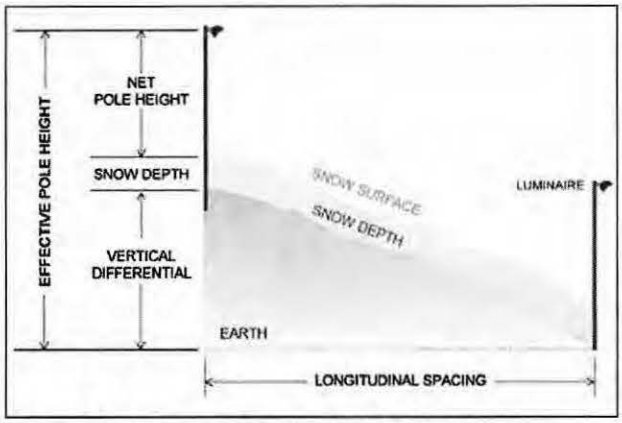


**Figure 74: Skiing - Effective Pole Height.**

Net pole heights should be determined from the requirements of coverage, beam spread, terrain and other conditions peculiar to the particular slope being lighted. In general, pole heights should not be less than 7.6 meters (25') above the average snow surface.

Recommended illuminance levels are:

***Class IV***

*Average maintained vertical illuminance:* *5 lux (0.5 fc)*

*Minimum vertical illuminance:* *2 lux (0.2 fc.)*

*Readings should be taken at 1m (3') elevation on a 9m x 9m (30' x 30') grid with the light meter pointing up the slope.*

## 8.27 Soccer

Soccer is a multi-directional ground level sport with the ball frequently being kicked very high into the air. Regulation soccer field size varies from a width of 59 to 69 meters and a length of 100 to 110 meters (328 to 361').

**Figure 75: Multi-field soccer complex.**

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Recommended illuminance levels are:

***Class I*** *– Horizontal illuminance: 1000 lux (100fc.) CV= 0.13 or less. ($E_{max}/E_{min}$ = 1.7:1 or less)*

***Class II*** *- Horizontal illuminance: 500 lux (50 fc.) CV = 0.21 or less. ($E_{max}/E_{min}$ = 2.0:1 or less)*

***Class III*** *- Horizontal illuminance: 300 lux (30 fc.) CV = 0.25 or less. ($E_{max}/E_{min}$ = 2.5:1 or less)*

***Class IV*** *- Horizontal illuminance: 200 lux (20 fc.) CV = 0.30 or less. ($E_{max}/E_{min}$ = 3:1 or less)*

*Illuminance readings should be taken at a 1m (3') elevation on a 9m x 9m (30' x 30') grid.*

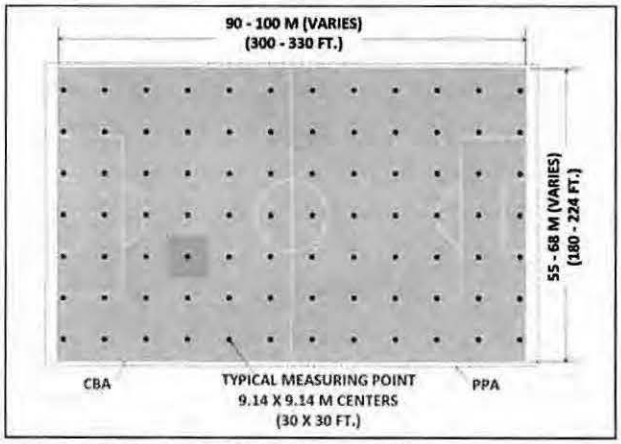



**Figure 76: Soccer - Calculation Grid.**

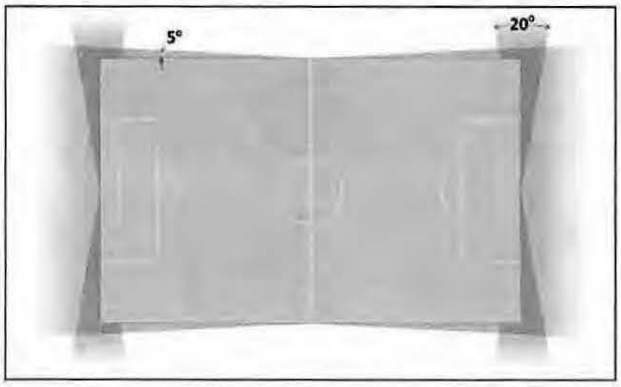



**Figure 77: Soccer Field Glare Zones.**

Poles or luminaires should not be placed in glare zones defined in **Figure 77**.

## 8.28 Softball

Softball is a multi-directional aerial sport similar to baseball except that it is played with a larger diameter ball on a smaller field. Softball field dimensions for either fast-pitch or slow-pitch vary with the league. The baselines are generally either 18.3 or 19.8 meters (60 or 65') and the outfield radius is usually between 61 and 91 meters (200 to 300').

Illuminance criteria are similar to those for baseball.

## 8.29 Swimming

***Class IV*** *– Private Community and Apartment Pool Decks:*

***Class II***

*Water Surface Luminance*
*161 candela per square meter*

*Water Surface Illuminance 300 lux (30 fc)*
*CV = 0.21 or less. (Emax/Emin = 2.5:1 or less)*

*Deck Surface Illuminance 200 lux (20 fc)*
*CV = 0.30 or less. (Emax/Emin = 4:1 or less)*

***Class III***

*Water Surface Luminance*
*108 candela per square meter*

*Water Surface Illuminance - 300 lux (30 fc)*
*CV = 0.25 or less. (Emax/Emin = 3:1 or less)*

*Deck Surface Illuminance 100lux (10 fc)*
*CV = 0.30 or less. (Emax/Emin = 4:1 or less)*

***Class IV***

*Water Surface Luminance*
*54 candela per square meter*

*Water Surface Illuminance 100 lux (10 fc)*
*CV = 0.30 or less. (Emax/Emin = 4:1 or less)*

*Deck Surface Illuminance 100 lux (10 fc)*
*CV = 0.30 or less. (Emax/Emin = 4:1 or less)*

*Illuminance readings should be taken at water and deck surface.*

Private community and apartment pools do not have the same lighting needs as public pools as they are for a more controlled group of users, familiar with the space and typically in smaller numbers. Adequate lighting is more of a security issue for observation with user safety being the prime consideration. Most security codes will use a minimum value of 1.0 fc on the deck surface as adequate lighting.

Illuminance readings should be taken on the deck surface, where people are looking when they move around (refer to **Section 5.5 Underwater Luminaires**.)

## 8.30 Tennis

Refer to **Section 7.28** for a general description of the sport, classification of play/facilities, definition of playing areas, and recommended reflectance value of surfaces. The illuminance values and uniformity ratios defined within the primary playing area (PPA– refer to **Annex D3** and **Annex G**) as shown are in general agreement with the United States Tennis Association (USTA).

| | |
|---|---|
| **From:** | SISunsetNeighbors @hotmail.com |
| **To:** | BOS Legislation, (BOS); Board of Supervisors, (BOS) |
| **Subject:** | BOS File #200992 and #200996, CEQA and CUA Appeal Supplement – Saint Ignatius Stadium Lighting (Planning #2018-021648CUA) |
| **Date:** | Thursday, September 17, 2020 10:59:50 AM |
| **Attachments:** | BOS File #200992 and #200996 - SINA Appeal Supplement 2020_09_17.pdf |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

**To: Clerk of the Board of Supervisors**
**Fr: SI Neighborhood Association**

Attached please find the first of several email submissions which will be coming through this morning
These supplement the CEQA and/or CUA appeals filed under BOS File #200992 and #200996 for the Saint Ignatius Stadium Lighting Project.

Please kindly confirm receipt.
Thank you

Deborah Brown, Secretary

SI Neighborhood Association

sisunsetneighbors@hotmail.com

September 17, 2020
TO: San Francisco Board of Supervisors

**RE: Appeal of Saint Ignatius Stadium Lighting Project, Planning Case Number 2018-012648CUA**

We are the Saint Ignatius Neighborhood Association -- made up of 165+ neighbors surrounding Saint Ignatius College Preparatory private school -- and we are strongly opposed to their proposed stadium lighting project located at 2001 37th Avenue in the Sunset District. We have additional support from the Sierra Club, D4Ward, and the Sunset Community Garden, among others.

As you will see from our CUA and CEQA appeal filings, expert testimonial letters, and the attached neighbor testimonials (from 2015 to the present) the Saint Ignatius Stadium Lighting Conditional Use Approval (CUA) does not meet a number of key planning code requirements and was exempted from necessary environmental reviews under CEQA. The Planning Commission has not adequately demonstrated how the proposed project actually satisfies the planning code or General Plan, nor how the project's environmental impacts would be negligible. Our consultants have determined that the project does not meet the purpose, spirit or intent of the planning code and General Plan, and that the project would bring lighting, noise, traffic and parking impacts that are much greater than the Commission and Saint Ignatius contend.

Saint Ignatius (S.I.) is planning to install permanent night time stadium lighting on their athletic field. These LED lights will rise 90 feet above the field which is directly adjacent to many of the surrounding homes. The light arrays on top of these light poles will be huge - about the size of 2 to 3 trash dumpsters next to each other -- and will rise above our neighborhood to be seen from as far away as Grand View Park. They will be grossly out of character and scale of the Sunset neighborhood. Please see images in Attachment 1.

These permanent stadium lights are proposed to be in use for <u>150 nights a year</u> until 9 pm and until 10 pm for large attendance sporting events.

In the past, S.I. has rented lighting for football games and the neighborhood (extending many blocks in radius) experienced the effects of night time games, namely increased traffic, cars speeding, blaring loud-speakers, cheering, air-horns, litter, absolutely no street parking, blocked driveways, double parking and pre/post gaming drinking and partying.

During these temporary lighted games, residents experience noise levels too loud to even have a conversation in their own homes -- even several blocks away from S.I. What would be normal conversations turn into shouting matches as we try to talk with our families Watching TV or having a quiet family dinner is out of the question during these nights. These impacts go far beyond the just the houses surrounding S.I. -- noise, lights and parking jams occur throughout a wide block radius -- from several blocks East of Sunset Blvd, down to 43rd Avenue as well as north and south, extending to Santiago and Pacheco Streets.

S.I. already has daytime and weekend games/practices that result in loudspeaker use, constant noise, parking and traffic issues. But this is to be expected when you live near a high school during school days and weekends, but not our evenings.

To our knowledge, S.I. would be the <u>only</u> high school in San Francisco with night time stadium lighting. Other SF private and public high schools (with much larger student bodies) have vibrant and healthy sports programs which are easily conducted during daylight hours or they use Kezar Stadium. As demonstrated by these other SF high schools without lighting, we question the real need for night time lighting at the school.

Earlier this year when SINA spoke with S.I. representatives about this lighting project, they stated that the night lighting is a marketing tool to enhance their athletic standing and will be used to attract potential student athletes to their school. They went on to explain that they must actively compete for exceptional student athletes to attend their exclusive private school.

S.I. has also maintained that their “new” co-ed sports activities require practices at night and thus the lights. In actuality, SI has been co-ed since 1989 and, if they have been in compliance with Title IX, this should not be a problem for either the school or the students. All other city high schools are able to schedule practices for all their students without needing permanent lights on until 9 pm.

As one of our neighbors, a high school educator asks -- what about the SI students? After a full day of school, they will now have sports practices until 9 pm. When will they finally get home, do their homework, or get some sleep? In the past, S.I. has dealt with serious issues

surrounding their students being pushed too hard. We question why the school is proposing to install permanent stadium lights and scheduling mandatory sports practices until 9 pm practically every school night. We all believe that sports are a healthy and necessary part of high school education -- but not until 9 pm. Further, as you will see in our submittal materials, the adverse effects of night time lights on teens brains is well documented.

Importantly, Saint Ignatius is an exclusive private school, with very few students coming from the Sunset neighborhood. The majority of their students actually come from outside San Francisco. The campus is closed to the public and the installation of the lights will only benefit the school -- to the permanent detriment of the neighbors' quiet evenings at home.

Saint Ignatius has historically been a good neighbor and we are accustomed to their day time sports events during school days and weekends. Saint Ignatius is a powerful and prestigious institution in San Francisco and many long-time residents in our association, while adamantly opposed to the stadium lights, are reluctant to submit letters of protest for fear of the school's repercussions. In the past, when some neighbors called S.I. Security to have students move their cars from blocking a driveway, or complained directly to S.I. about their leaving litter in their front yards -- neighbors found graffiti on their garage doors, eggs thrown at their homes, and in a couple of cases trash/dog feces put through their mailboxes. While these cases are not common, they leave a lasting negative impression on our neighbors.

The installation of permanent stadium lighting at S.I. would be extremely disruptive to our evening residential living. As you have read in our appeal, this CUA flies in the face of the SF General Plan guidelines, most importantly: 1) to protect residential areas from the noise, pollution and physical danger of excessive traffic, and 2) to protect the livability and character of residential properties (Urban Design Element Policies 4.1 and 4.15).

These stadium lights, and their extended use virtually every weeknight during late fall, winter, and early spring, will substantially impair and impede the reasonable use and enjoyment of our homes and our quiet residential Sunset neighborhood. We have young children who need early bedtimes, we want to enjoy quiet dinners with our families, we want to be able to park in our own driveways after work, and we want our friends and family to be able to find parking near our homes.

Our neighborhood association is not asking anything that any other school area neighborhood currently enjoys -- the ability to reside in a peaceful residential zoned neighborhood with quiet evenings.

This is not hyperbole; attached are neighbor letters dating back to 2015, documenting the past repercussions of night time S.I. games, the lit practice field usage, and even excessive day time loudspeaker noise at practices.

If these lights are installed, anything goes, and while SF Planning issued a final motion with certain usage conditions and S.I. has developed a (flawed) Large Event Management Plan, there is really no enforcement mechanism. It will be up to the neighbors to monitor the usage of these lights and the associated traffic, parking, and nuisance issues, and to report on any violations.

The Planning Department and the Commission have not addressed any of the points raised by neighbors in their many letters, in SINA's submittals for the Commission hearing, in the draft and final Motions, or in the appeal response memorandum. They continue to assert the project benefits without considering any of the many valid neighbor concerns.

We strongly urge the Board of Supervisors to overturn the Commission's approval of this project as it is not necessary or desirable for the neighborhood, and the adverse impacts to our neighborhood's livability far outweigh the benefits to the school that the project might bring. At the very least, the Board should be able to recognize that Saint Ignatius must do a great deal more work to demonstrate that the project will not create the impacts that we reasonably expect, and to make the project an acceptable new use of the school campus.

Sincerely,

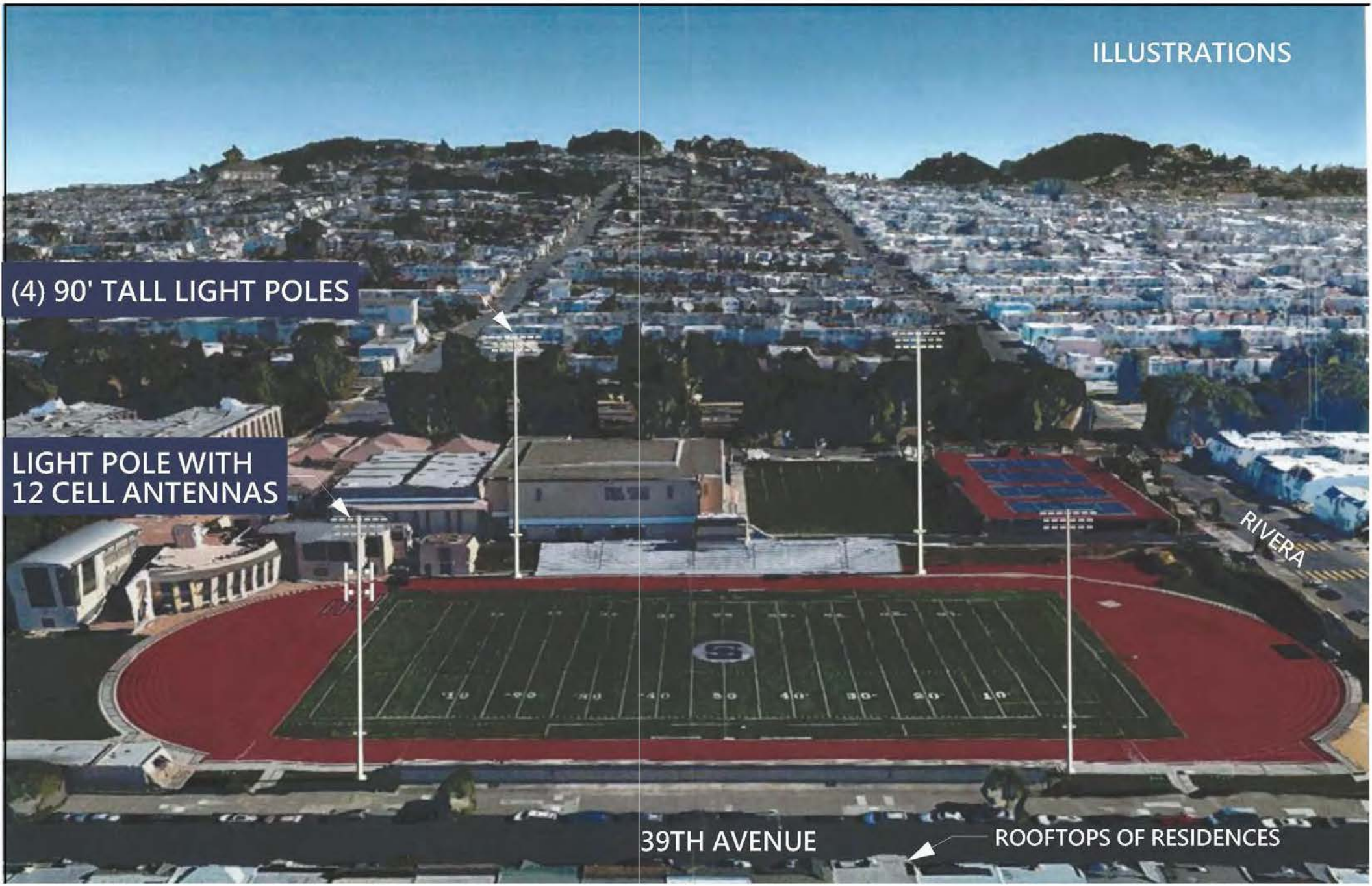
Deborah Brown, Secretary

SI Neighborhood Association

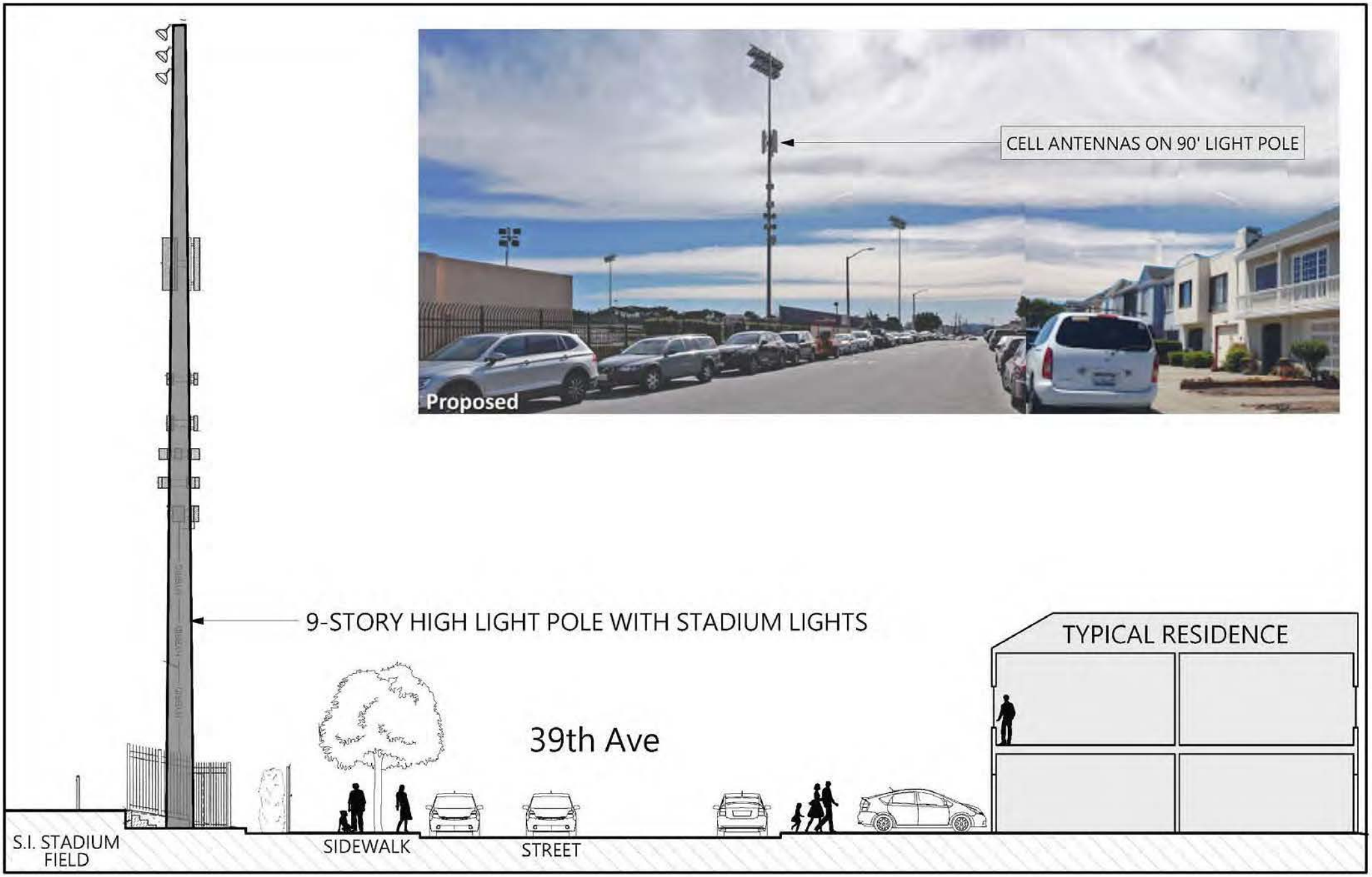
Attachment 1: Visual Renditions of Light Towers
Attachment 2: Neighbor Past Experience Testimonials, 2020
Attachment 3: Neighbor Planning Commission Opposition Letters, 2020
Attachment 4: Neighbor Opposition Letters to District 4 Supervisor, 2015
Attachment 5: SINA Online Petition Opposition Comments, 2020

# ATTACHMENT 1

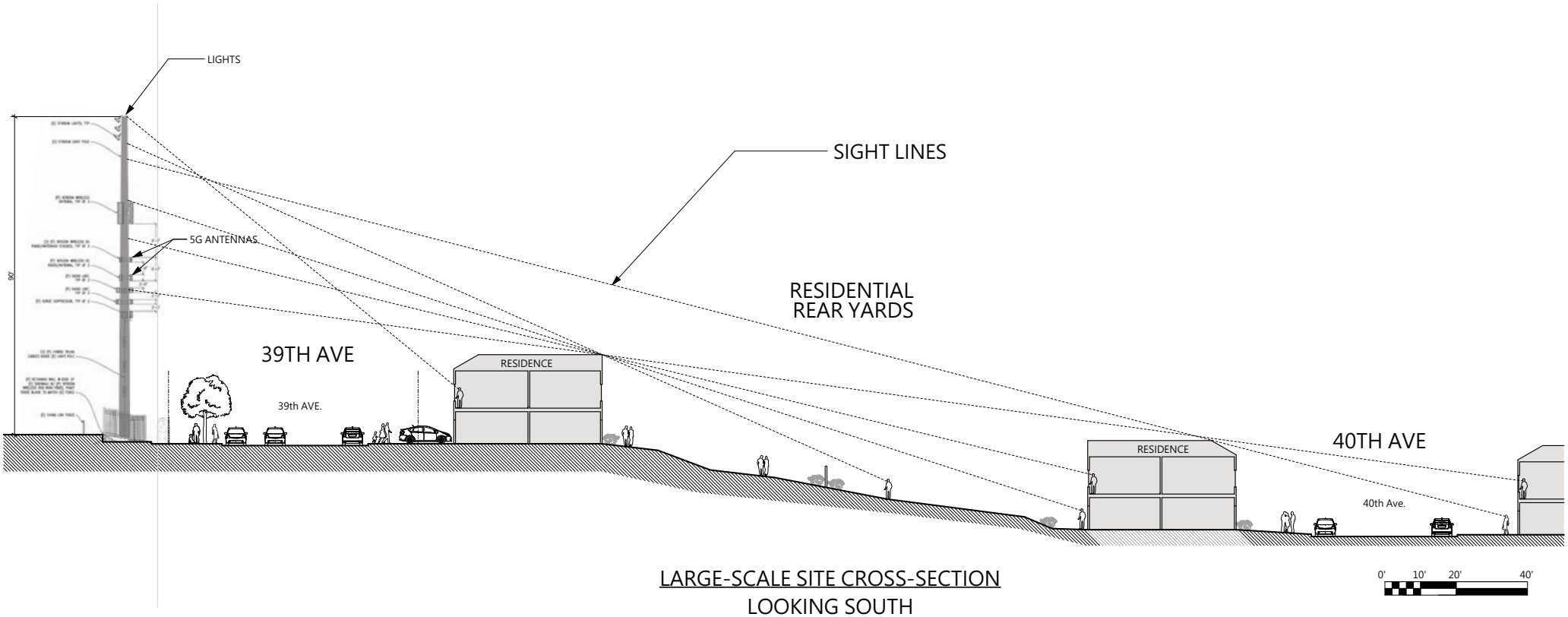
# VISUAL RENDITIONS OF LIGHT TOWERS


ILLUSTRATIONS
(4) 90' TALL LIGHT POLES
LIGHT POLE WITH
12 CELL ANTENNAS
RIVERA
39TH AVENUE
ROOFTOPS OF RESIDENCES

CELL ANTENNAS ON 90' LIGHT POLE
Proposed


9-STORY HIGH LIGHT POLE WITH STADIUM LIGHTS
TYPICAL RESIDENCE
39th Ave
S.I. STADIUM FIELD
SIDEWALK
STREET

S.I. PROPOSED LIGHTS & ANTENNAS
ILLUSTRATION OF CONTEXT
BY NEIGHBORHOOD RESIDENTS
MAY 6, 2020




LARGE-SCALE SITE CROSS-SECTION
LOOKING SOUTH
W/ SIGHT LINES

## 39TH & 40TH AVENUE VIEW

# ATTACHMENT 2

# NEIGHBOR PAST EXPERIENCE TESTIMONIALS
# 2020

**From:** Peter Koch <kochsf@att.net>
**Sent:** Thursday, September 3, 2020 8:46 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Your Past Experiences with SI night games

Hi Deborah, this is Peter & Sandy Koch at 2825 Rivera St. S.F.

We Have lived across from Saint Ignatius for almost 30 years. During those Friday night football games that SI put on with temporary Lighting, it was extremely disruptive. Our biggest complaint was the noise.

From about 7PM to 10 O'clock we couldn't even be in our living room, the noise was so loud.

We had cars parked in our driveway and litter all over the street.

We have always , over the years , been good neighbors with SI when they went through various building projects ( Art Center , Swimming complex, Tennis courts, etc.). But this new project of lights and Friday night football games is unacceptable.

My wife and I tolerated those the Friday night games because we thought they were a one-time event, but the disruption on an ongoing basis is frightening. The parking was dangerous if we had to get out of our garage in an emergency. My wife was scared with all the teenage camaraderie going on after the game, which I witnessed a lot of drinking. This quiet neighborhood cannot absorb 2,000 or more fans.
I am not comfortable in my own house during those football night games.

Thanks Peter & Sandy Koch

---

**From:** Tiffany Pavon <tiffany@tiffanypavon.com>
**Sent:** Tuesday, September 1, 2020 5:14 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Your Past Experiences with SI night games

Hi SISunsetNeighbors-

Night lights----

We live directly across the street from Saint Ignatius on 39th Ave.

When there are night games, we are unable to use our living room or use our front bedroom. The lights shine into our home even with the shades shut, I'm not talking street lights it is like daylight but harsher. Then there is the noise from the loudspeaker, cheering, music, and people milling about, we cannot even watch tv or have a conversation in our own home. We have the right to quiet enjoyment in our homes and these games are very disruptive for all of us.

Then add in all the traffic, double parking, blocked driveways, people hanging out in front of our house before and after games. There have been countless times that

we are unable to get in and out of our driveway due to it being blocked. We have had people yell and become combative when we ask them to move their cars so we can get in and out of our own driveway. The school staff sees this yet has failed to act even after we as neighbors have asked for help addressing these issues. With adding night games these issues will become worse.

SI has been able to have their sports programs work together to use the field without adding lights for many years. Why do they need to do this when it creates so much disruption and chaos in a residential neighborhood? We also have children that are in school and need to be able to go to sleep at their bedtime and can not with the bright lights glowing in their window, noise blaring.

I have attached an audio file with how loud the loudspeakers were during a daytime practice last month. This was just a day time practice without cheering, music, noisemakers, etc.

Tiffany

---

**From:** Coral Ho <coral_ho@hotmail.com>
**Sent:** Monday, August 31, 2020 10:51 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Your Past Experiences with SI night games

Hi Deborah,

Here are what I experienced withe the rented light game day before. I have lived in this neighborhood for 20 years and I was affected by the game every time. I don't remember when SI have the game but I did remember all the bad experience from the game night.
Since my bedroom is facing the SI football field, the light was so bright that was affecting my little kids to get to sleep.

Also, lots of people were screaming and yelling during the game, it created lots of noise.
In addition, lots of car park around the neighborhood during game day. The SI student already generate lots of car parking occupy problem in our neighborhood, with the game, it gets worst. I just experienced it today that an SI student parked her car in front of my house since yesterday (Sunday) and then she moved her care today when I got home from work at 5:30pm. If there is game, she may not moved her care until later of the day.

Hope my writing can help.

Coral

---

**From:** Christine Crosby <christine.crosby10@gmail.com>
**Sent:** Friday, August 28, 2020 12:07 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Update & an Important Request

Hello,
My name is Dr Crosby and I reside at 2186 36th Ave, across the street from SI. In the past few years, temporary lighted night games have resulted in blinding light through our living room windows, making it difficult to rest and have story time before bed. When the practice field is rented to club sports, which are expensive, exclusive sports league, the lights are often left on past their permitted time and shine directly into homes and bedrooms on 36th Ave.

My driveway is often blocked on both sides, preventing us from even using the curb or sidewalk to access our driveway and garage. Parking blocks away when returning from work/school/grocery stores means we have to schlep our belongings and child home rather than park in the driveway or garage which we have every reasonable expectation of being able to use. It also means that visiting guests have nowhere to park conveniently. This includes our senior citizen family members, many of which have mobility issues. When a certain relative visits, her knee prevents her from walking long distances. Many times, she's unable to access the driveway spot we "save" for her when she's expected. She double-parks in front of our home while coming inside and my husband drives her car to find a spot and then returns, wasting valuable family time, when we should be able to use our driveway for the vehicle.

Parents and students alike give us the "finger" when we inform them that they are parked illegally, blocking our access to our residence, and ask them to find a more appropriate space. While we sometimes ticket/tow, we fear that these inconsiderate "neighbors" will retaliate and damage our home, or worse injure our family. Due to their behavior, we have no reason to give them any further benefit of a doubt. We resorted to paying almost $500 to the SFMTA to paint our curb tips red, but this also does little to discourage illegal parking and our driveway is blocked frequently regardless.

The litter left behind from normal school days is quite annoying, but after games, the discarded alcohol containers and other trash is disturbing. The broken glass is a hazard to pedestrians and bike tires, especially children using balance bikes. There's no effort made by SI to mitigate these problems and when the school is called to inform them of a mess clearly left by a student (signed homework) they respond by asking "Why are you calling us? Just clean it up". We would appreciate that the offending student be asked to apologize to the neighbors they littered on. That's what I would do with my child, should he be so inconsiderate. We frequently observe track and other SI athletes using the green space as their personal bathroom. This is really exemplary of how the SI community feels about the Sunset district in general. We all have a responsibility to teach children in our charge right from wrong, something a religious school ought to take more seriously.

---

**From:** Anne Marie Benfatto <annemarie2@comcast.net>
**Sent:** Friday, August 28, 2020 7:57 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Update & an Important Request

Hi Deborah,

Attached please find a letter about the impact of day and night games on the neighborhood. Thanks for collecting all of this info and working so hard on this.

Thanks so much,
Anne Marie

---

**From:** Josette Goedert <josette.goedert@gmail.com>
**Sent:** Friday, August 28, 2020 11:12 AM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Update & an Important Request

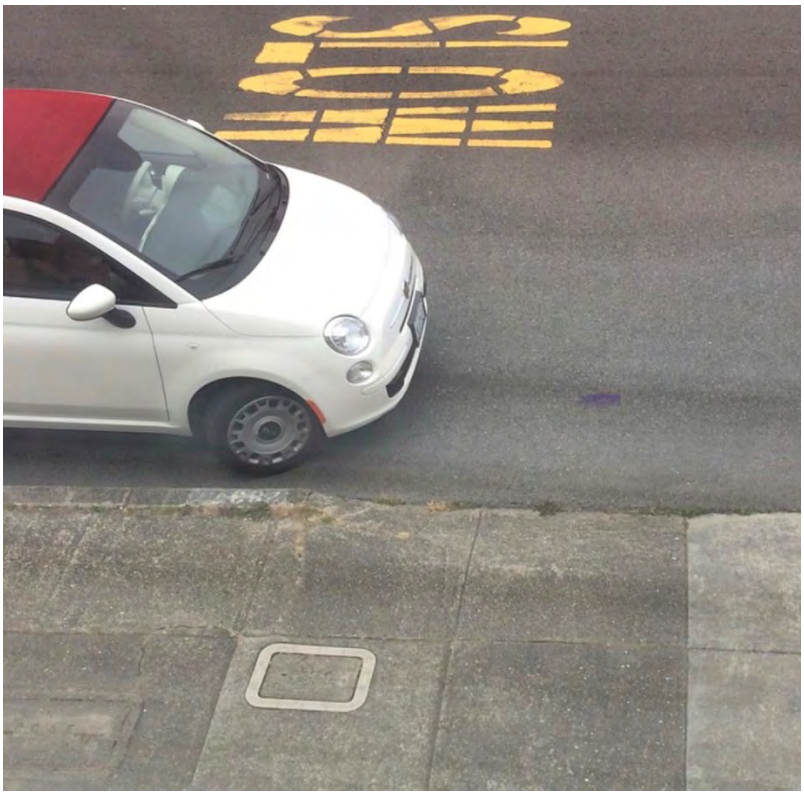
Hi Deborah,

We have lived directly across from Saint Ignatius for 8 years now (39th and Rivera) and their level of consideration has gone significantly down. At first we were able to come home and enjoy our home on the weekends or evenings, but now it's almost out of question. Every single weekend they either have a game or have rented out their fields to external organizations such as pee-wee football, lacrosse, soccer, frisbee golf, all day activities or sports camps, etc. If we need to leave the house we know that we will not get parking anywhere near our home or have any peace and quiet. The events start early in the morning (sometimes blowing whistles as early as 6:45 AM on a Saturday) to not ending until way past 4 or 5 PM in the evening. This goes on almost every weekend. Saint Ignatius also starts some practices Monday through Friday with whistles blowing again as early as 6:45 AM.

We've had our driveway blocked so many times that we have resorted to calling SFMTA to issue tickets because we have no other choice. I personally have had SI parents blatantly ask me if I was going anywhere "anytime soon", so that they could illegally block my driveway because they were late for an event at the school and they couldn't find close parking. I had to let those parents know that if they remained parked in my driveway that I would tow them and that it didn't matter if I had anywhere to go - I need access to my car in the garage. I have called the school several times to get their students to move their cars out of my driveway or out of my neighbors driveway.

Anytime I have politely asked a student to move their vehicle 9 times out of 10 they have argued with me and then I tell them that they can get their car out of the impound if they park there. They then move their vehicles out of my driveway. I have included a photo of their student's vehicle in my driveway from May 5th, 2015. I called the school and SFMTA - the student arrived just before SFMTA did and moved their vehicle. I was significantly late for a meeting that day due to their student parking in my driveway and I told the SI office that, but they didn't seem to care, but only offered the rebuttal of "the student's know the rules and we had them move their vehicle."

On weekends it's almost worse because the people who come from outside the city never obey the red on the driveway. We had a pickup truck park in between my driveway and our neighbors (mind you a Prius can fit there, but nothing bigger). I then had to argue with the driver to move his truck and he told me that he was late for his son's football game and I had to let him know that his truck would be in the impound if he didn't move it. Almost every weekend I have to let someone know to not park in my driveway. The last time I called SFMTA was last November on a weekend and the driver argued with SFMTA for giving them a ticket.



When Saint Ignatius had their temporary lights up last year they were shining directly into our home. We could turn the lights off in our house and have it still be illuminated brightly. SI did not turn the lights off when they were supposed to and sometimes they stayed on for at least another hour after they were supposed to be turned off. This would be as late as 10 PM some nights. The level of consistent noise from the loud speaker is blaring. I have included a video from their practice on June 15th at 4:05 PM. This is a small example of how loud it is, but please note it's much louder for games and for all day weekend events and games.

Overall, SI isn't a good neighbor and now that we have a 1 year old daughter - I would like to be able to keep her naptime and bedtime routine without consistent noise, crowds, loud speakers and bright lights. Saint Ignatius has not taken into consideration how this will affect the small children in the community when the lights won't go off until late shining directly into their bedrooms. Having the lights be used for up to 200 nights per year is absolutely ludicrous and in the end potentially causes our child's nighttime routine to be drastically changed. They have not taken into consideration how the small children in the neighborhood would be affected by their NON-ESSENTIAL 90 foot lights. The yes vote has shown our community that the city favors Saint Ignatius and their students that pay an exorbitant amount of tuition for a project that doesn't directly affect their education, but negatively

affects the Outer Sunset. The Saint Ignatius students and parents do not have to live with these lights and 5G technology across from their homes. They will drive home, which is mostly outside of San Francisco city limits.

It remains beneficial to preserve the family oriented environment that has been developing over the years for young families here in the Outer Sunset. I cannot in good conscience find anything positive with their proposal for 90 foot lights, up to 200 nights a year field usage and 5G technology. Saint Ignatius likes to tout themselves as good neighbors, but they are anything but that.

Best,

Josette

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**From:** village attab <villageattab@yahoo.com>
**Sent:** Monday, August 24, 2020 8:45 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Update & an Important Request

We live on 2450 38th ave. few times we experienced loud noises from games. I thought that it came from Vicente and 42nd ave. I went out to discover that the loud noise came from St. Ignatius High School. I walked toward there and the louder it became. The game was just ending. So many people were idling around continuing the fiesta outside of the stadium, some were drinking, some were smoking, and others just loud and loud disrespectful of the neighbors. The whole area matter of fact looked out of control. I thought to myself how could a school treat its neighbors this way? The light were vivid, cars everywhere and many were just honking and oblivious of the neighborhood's children who must rest and go to bed.
Unfortunately I didn't record the time or took any photos. I just went on a fact finding mission. I was about to tell the police but I didn't. That day disgusted me of that school and never wish that decent people would send their children there.

Nafiss Griffis

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**From:** carole gilbert <carolegilbert@comcast.net>
**Sent:** Friday, August 28, 2020 9:54 AM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Update & an Important Request

My name is: Carole Gilbert.
I live at: 2179 40th Ave
SF CA 94116

I have lived here since 1984, 36 years. In that time I have watched St Ignatius high school expand both physically and with the student body population.

In recent years we have had a lot of trouble with students and parents blocking the driveway. I've had vehicles ticketed and now have turned to having them towed due to the seemingly lack of consideration for our neighborhood.

During the night and weekend games we typically have parents and students double parking on 39th Ave. and Rivera St. Due to double parking, the 48 Quintara bus is not able to turn on 39th Avenue, It is forced to change its route and come down 40th Avenue. The police do not seem to be monitoring this situation I have seen motorcycle police just watching the games but not monitoring the issues mentioned above.

The temporary lighting that SI tested out lit up the sky. It looked like daylight was coming in our windows that face the SI field. We always can hear the loud speakers blaring, and the crowds cheering.. This is extremely disruptive and once SI increases their night time events to150 + events per year it will be impossible to relax in my home in the evening. The games/practices will be until 10 PM during week nights and weekends. The crowds that leave will linger walking to their cars, making noise, tossing liter and racing up our streets. Why students need to play games and practice until 10 PM when they should be home doing homework and sleeping is beyond me.

The public San Francisco high schools do not have night games at their schools. When this occurs, they play at Kezar Stadium they don't disturb their neighbors. Why can't SI do this?

I find this behavior a detriment to our ability to enjoy our quiet home life. Noise, double parking, trash, people hanging out are not acceptable to me.

Please reconsider their petition for this lighting project. Do not allow them to disrupt our neighborhood. I know if you lived in our neighborhood you would not want this to move forward.

Thank you,
Carole Gilbert

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**From:** timothy brey <timuna@gmail.com>
**Sent:** Friday, August 28, 2020 10:37 AM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Update & an Important Request

To Whom It May Concern,

My husband and I live on Rivera St directly across from Saint Ignatius' football field end zone. Student athletes normally stay until about 7 pm during the school year. They all seem to have cars and park them throughout the neighborhood. While not always convenient, this has been manageable. Now SI wants to start school later and with the addition of permanent lights have student athletes here until 9 or 10 pm. They also will have big games here (football, and to an extent soccer and lacrosse) which will bring crowds of 2,000 people or more. They normally have their football games on Saturdays all day, which impacts the neighborhood in a negative way due to the impact of increased car traffic and parking issues (parking in people's driveways and taking any and all parking spaces for at least four blocks in every direction). Having lights on for most of the night and having crowds with major traffic, parking, and noise issues is not taking the needs of the neighborhood into consideration.

During the planning commission meeting, the SI principal told the commission that game attendance would not exceed 1,000 people. Either she was intentionally deceiving the commission or has not read SI's own material which they sent out to their neighbors. According to their own printed mailer, they have at least 8 games scheduled which they deem high attendance: having up to 2,000 people. I know for sure that when they play Sacred Heart or Serra high schools, attendance will be over 2,000 people as

those are big rivalries and bring out a lot of people, many who do not even have current family members attending SI.

Also, SI promised (at the planning commission meeting) to dim the lights at 8:30. I don't see how they can make that promise as that would entail dimming the lights in the middle of a football (or other sport) game. We as neighbors have no way to hold them accountable.

The planning commission only seemed to consider what was best for SI and its students. The neighbors and neighborhood and the public interest didn't seem to merit much concern or consideration. That's not right and seems in direct conflict with the mission of a public agency such as the planning commission.

Playing high school sports should not create such an imposition on the neighborhood and have so many negative consequences for those of us who live here.

Attached are two photos taken when they had temporary lights up for evening practices.

They had them up for a couple of months. These lights were very bright. Many times they left the lights on after students had left the field. Often they had a loudspeaker on during practices giving students directions/commands as part of their training. We could hear it with our windows closed. Does that kind of behavior sound like a good/considerate neighbor to you?

Sincerely,
Una Fitzsimons and Tim Brey

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**From:** Joy Chan <joychan327@gmail.com>
**Sent:** Sunday, September 13, 2020 12:47 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Your Past Experiences with SI night games

Hi Deborah,

Here is our past experience, sorry it may not be a short description. You can extract what you need. I am going to write the email to Board of Supervisor next, with some of the similar comments.

I want to share our family experiences with the SI's night sports activities in the past several years we live here.

First of all, we live directly across from the SI sport field on Rivera St between 38th and 39th Ave. We already foresee this project of installing new 90' tall lights will have adverse effects on our family and house, which we worked so hard to build over the years. Over the last few years of living here, we have to tolerate 1) difficult parking during school days, 2) difficult parking during the early evening and weekends when they have games, 3) cars blocking our driveway all the time (the curb side outside our house can only fit a small car,

so when someone try to park a larger car, it will block our driveway by a foot or so), 4) double parking all the time at the block on Rivera St between 37th and 38th Ave making driving and crossing streets with my kids very unsafe. Not to mention all the noise and littering problems outside our home, we have to constantly pick up the emptied snack bags that were left on our sidewalk (I know I cannot prove these were from the SI students but I am sure at least some were from them).

To make matters worse, I remembered earlier this year in February, SI rented a few temporary lights for their night practice, this was the worse nightmare we had. When we got home in the evenings, the lights shined straight into our house, from our living room all the way to our master bedroom at the very back of our house, the whole house was flooded with lights. To give you some context, I measured on Google map, from where the lights were placed, they shined about 500' from the north side of the field all the way across the block and then through my house which is 63' long, approximately 600' of array of lights. My kids said the lights hurt their eyes and we had to close off our curtains for days until the Daylight Saving kicked in and SI did not have to use the lights anymore. I had called SI and talked to Tom (Director of Communication) and John (Director of Athletics), they tried to address the issue but it did not help.

Our concern is with the new 90' tall lights, although it claims this is newer technology that will minimize lights shining onto the neighbors, who can guarantee it will not be as bad as the lights we experienced earlier this year? Once the lights are installed, that is it, the matter is settled, we have no way to complain. Also, even though these new lights may not shine horizontal directly onto the neighbors, the glow of the lights and multiplying by the glare effect from the fog, I do not think the light pollution will be a non-issue.

I urge the City officials and Board of Supervisors to listen to the neighbors, this light project is really pushing forward to the advantage of SI only but at the expense of the neighbors. There are many alternatives they can do to continue promoting their strong athletic programs and having night practice is not the only option. Can they better schedule their class time? Shift some of the practice to during the day and other classes in the evening if the students are to stay longer hours at school anyway? On the other end though, we have no options, this is a neighborhood we live in, family and house we worked hard to raise and build. To not get impacted, does it mean we can only move to elsewhere?

Best,

Joy

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**From:** DM Little <florence723@yahoo.com>
**Sent:** Monday, August 31, 2020 2:13 PM
**To:** SISunsetNeighbors @hotmail.com <sisunsetneighbors@hotmail.com>
**Subject:** Re: Your Past Experiences with SI night games

Deborah - our family list is attached - Denise Malmquist-Little, Malmquist Family Trust

MALMQUIST FAMILY TRUST
Denise Malmquist-Little Trustee
Trustee holds full Power of Attorney for all matters pertaining to
3031 Quintara St. SF CA 94116 AND Marie J. Malmquist
CONTACT: 415-665-4746 florence723@yahoo.com

September, 2020

**LIST OF EXPERIENCES DURING AND FOLLOWING NIGHT GAMES/EVENTS HELD AT ST. IGNATIUS COLLEGE PREPARATORY affecting our home and our block (Quintara between 39th/40th Avenues):**

*First, we apologize for having no pictures or formal documentation. We never thought such would be necessary. We have shared all this with SI in the past and were told they would look into it. The only improvement we have seen was the PA system doesn't carry as clearly as far as 30th Ave anymore.*

•Urination – almost every night field event for the last 5 years has found our doorway (we don't have a gate) being used as a restroom. The smell is horrible, and clean-up disgusting. It has also sometimes occurred after late events such as dances or theater events.

•Cigarette butts – butts are flipped out of moving cars towards our home … our home has wood/flammable siding. Burning butts, smoldering butts, and cold butts are left in our doorway, on our driveway, and in what used to be our front yard (presently being prepped for new landscaping). We used to have a large pine tree in front and sometimes cigarettes were ground out into the bark.

•Food & food wrappers – are tossed with no regard to proper disposal. They land in front of the house, in the doorway, in the old plants, and the ultimate was when the wind carried the trash up onto our roof!

•people in our doorway – street lighting has improved, but it is still dark in our doorway when our porchlight is off. From the dark, we hear the voices of groups hanging in our doorway; language is often crude. Trash is left behind. Smoke comes up into the house – cigarette and marijuana. We would have to get up out of bed and turn on the porch light to get them to leave, and sometimes they wouldn't…

•Drug dealing – SI security knows about these guys. They park on the Q street hill and have police scanners in their cars. They host folks to sit in the car and smoke weed. Some kids/young adults stop and make a purchase and leave; they even do drive-up window-to-window. SI security has worked with our neighborhood and SFPD to clear the area of such dealers. If there weren't buyers coming to evening and night events, there wouldn't be dealers.

•Blocked driveway – Mom is 90 years old. If we have a late appointment, parking is all taken up and sometimes I cannot even get into the driveway to take her in. I have to double park and try and get her into the house safely. Same thing happens if I take her out to eat dinner. Depending on the time of year, it has been dark and more dangerous trying to get her safely into the house. This is also a problem during the regular school day, but SI security is more help in finding student drivers and having them move their cars to not block the driveway. At evening/night events, SI doesn't have that ability.

•Noise – The loud speakers are very loud. The crowds are very loud. During night field events, we cannot have a conversation in the house without shouting. The TV has to be turned up to a high level to be

heard. We cannot use our deck because the noise is worse outside. SI did adjust their volume once they learned the play-by-play could be clearly heard and understood all the way up past 30th Avenue, but it is still super loud right next to the field.

•Dangerous driving – When hyped up at events, teen judgment takes a backseat. We have witnessed drag racing up our hill, kids on top of moving cars, items flying out of moving cars (balls, trash, clothing), kids standing in cars out of moon roofs, and kids hanging on to car windows while standing outside and the car is moving.

•Adults – whether evening practices or full blown events/games, adults double park, leave engines running, and talk loudly before, during, and after the event. They make driving on the hill dangerous because corners are blind and cars are going two ways in one way worth of street space.

•After parties – often people don't leave once SI locks their gates. Groups congregate in the Quintara Street parking lot, in the baseball field & seating, and in the soccer fields for drinking and partying. This is disturbing and unsafe. They are often even out on the street standing around their cars, leaving beer cans behind.

*The submission is compiled from the combined memories of the Malmquist Family over the last 5+ years.*
*Submission composition: Denise Malmquist-Little, Head Trustee.*

# ATTACHMENT 3

# NEIGHBOR PLANNING COMMISSION OPPOSITION LETTERS 2020

2179 40th Avenue
San Francisco, CA 94116
August 28, 2020

SF Planning Commission

Dear SF Planning Commission:

I am writing to ask you to reconsider your approval of Saint Ignatius High School's plan to install lights for nighttime activities.

I have lived in my home for the last 36 years. When I first moved in, the impact of SI was not felt on our neighborhood. Over the years, they have expanded their physical footprint as well as the size of their student body. It seems that over the years, the students, parents and administration have had less respect and less regard for our neighborhood. Their Good Neighbor Initiative has had little impact on the behavior of the SI community.

Street parking has been an issue for years. I cannot count the number of times that my driveway has been blocked. One morning I told a student that he was blocking my driveway. He said that he was late for school, that he didn't have time to move his car and just walked away. Not only is this a problem in the daytime, but it is also a problem when SI hosts night games. Students, parents and spectators double park and block our driveways with no regard for the inconvenience they have caused to the people living in the neighborhood. With SI's proposal to host more than 150 nighttime activities a year, this will be a problem day and night, many days a year.

Noise is also a big problem during their outdoor activities. The loudspeaker, the horns, the whistles and the crowds can easily be heard in my home. It is not possible to have a quiet conversation in my own living room. If this were happening many nights a year until 9PM or 10PM, this is totally unacceptable. Often at the end of the games, people going to their cars have been very noisy and sometimes very disruptive. They leave trash in the streets or in our yards. I have seen students driving recklessly, speeding and running stop signs.

Another new issue that I have noticed this summer is that the SI students who are participating in sports are often not respecting social distancing and not wearing masks. When I have passed them on the street while they are training, I have politely reminded them that they should be wearing the masks that they are carrying in their hands. Responses have been things like, I don't have to wear a mask I am outside or I don't have to wear a mask because I am running. If the school is not enforcing proper safety for its students, how can we be assured that they will be enforcing proper behavior during daytime or nighttime events? If the students, parents and spectators are not going to observe recognized Covid protocols, they are endangering each other as well as the people who live in our neighborhood.

The fact that SI is located in a residential neighborhood is a unique situation. It is not the norm in San Francisco to have multiple blocks of residences within a couple of hundred feet of high-use school sports fields. No other high school in San Francisco has night games at their home fields. It is an unreasonable expectation for SI to expect their neighbors to give up their peace and quiet **in their own homes** so that their students can play sports at night. They are not acting as good neighbors, but as an institution that has no regard for the good of the community.

Sincerely,
Anne Marie Benfatto

From: **Christine Crosby** <christine.crosby10@gmail.com>
Date: Fri, May 1, 2020, 3:07 PM
Subject: Letter to Protest Application at 2001 37th Ave, SI Lighting Project
To: <jeffrey.horn@sfgov.org>, <corey.teague@sfgov.org>, <rich.hillis@sfgov.org>, <delvin.washington@sfgov.org>
Cc: sisunset neighbors <sisunsetneighbors@hotmail.com>

Dear Supervisor Mar and SF Planning,

My name is Christine Crosby and I reside with my husband and young son at 2186 36th Ave, right across from St. Ignatius College Preparatory. When we purchased our forever home, I was thrilled to be so close to our great public schools and the green space of Sunset Boulevard. My husband was humored to be moving next to his alma mater, S.I., which he attended about 20 years ago.

We are now so disappointed to learn that S.I.'s "good neighbor pledge" does not include maintaining the peace and quiet of our neighborhood. This holiday season, it's very possible that the brightest thing in our living room will be the glare from new stadium lights, not our Christmas tree lights. The loudest thing in our living room won't be my husband teaching our son carols on the same piano that he learned to play on as a child; it will be the ruckus of visitors leaving night games, practices and events. The problems of students and visitors using the Sunset green space to relieve themselves (I have videos) will only intensify, as will the discarded coffee cups, take out containers, and other debris, currently at an all time low with school out.

Aside from spoiled special occasions, our daily life will be altered by later bedtimes than are recommended by the American Academy of Pediatrics. An 8 PM bedtime will be nearly impossible with the disruptions to our neighborhood. Proper circadian rhythms are essential to good physical and mental health. This is true not only for humans like my son, but for nearly all species. There are many genes conserved across species involved in using daylight to regulate the body's clock, signifying its biological importance.

Unfortunately, there has been no EIR or CEQA presented to the community for review. This is due to a "No New Use" claim on the proposal application. *This claim is utterly false and should not be accepted by City Planning*. In 2020, we must look forward and not backward. We must have a look at how this project will affect our environment as a whole. It is no longer acceptable to sacrifice our environment tomorrow for our convenience today. My son and all future generations deserve better than that.

During this global pandemic, there is time for the applicants to make concessions if they are no longer willing to abide by the terms of their original "Conditional Use" permit. They can submit an environmental impact study to ensure the appropriateness of this project. Should it be deemed appropriate, they can add local community service hours to their student's graduation requirements that would provide clean-up after events. They can clarify how many nights this will be used until 10 PM, and limit it to no more than 30. They can include the community in true engagement during which we are unmuted. There are any number of ways we could work together, if the City will give us the extra time to do so.

I ask that you please assist us by delaying this upcoming Public Hearing until the community can have a real Neighborhood Meeting with SI and Verizon and our voices can be *heard*, not muted. I ask that you please delay this hearing until there is more information on how this will impact the quality of our environment. This is a very important issue that impacts our community in an enormous way and will for decades to come. History will not look kindly upon a hasty decision in this uncertain time. Right now, you have the opportunity to do good for your community, I hope you take it. Thank you for your consideration. Stay well and healthy during this unsettling time.

Best,

Christine Crosby, Ph.D

Opposition to SI Lighting Proposal during SIP

Christine Crosby <christine.crosby10@gmail.com>

Dear Jeffrey and Delvin,
I hope you and yours are well during these increasingly trying times. I am writing today to express my dismay at the lack of transparency S.I. and Verizon have been showing during the application process for permanent nighttime lighting of a residential neighborhood at 2001 37th Ave. They recently released notes from the "Neighborhood Meeting" held via zoom on May 28. These notes were not provided to the SINA, as requested, but were found via a lengthy internet search.

The meeting notes do not indicate that the entire community was muted and no questions asked during the meeting were addressed. This is important. Since then, there have been ZERO additional opportunities to collect or impart feedback to SI. My calls have letters have received no reply. The installation of 90 foot lights, and all the downstream consequences to our neighborhood, deserve more consideration than that. We deserve to have a forum, in person ideally, to be heard.

Further, the information presented during this "meeting" was insufficient and not reviewed. At least one slide showed the relative cell phone coverage of our neighborhood showed my home as having little to no coverage. I have a Verizon device and have never had a problem with coverage in this home. I strongly challenge the veracity of this report and encourage the Planning members to do the same. Please do not base this decision solely on one side of the story. All good data can stand up to scrutiny. Now more than ever, we should be scrutinizing what we are presented with.

Finally, I received a letter (also posted to the SI website) detailing their argument for the lights. I found this to really stand out in my heart: In the first paragraph they admit that this project is an "enhancement" for their students. In the second paragraph the wording is changed to "necessity".

They may believe this will enhance their athletic program, but it will detract from residents reasonable enjoyment of their neighborhood. As for the claim this is needed, shouldn't we wait to see what large gatherings look like in the future rather than continuing to play from yesterday's playbook?

One extremely important question that SI has refused to answer is how many nights will the lights be used for? And how will they be tracked/measured/accountable to this? There are so many logistics that have not been worked out.

Please stay well and healthy. Thank you for your consideration.
Best,
Christine Crosby, Ph.D.

My name is Carole Gilbert and I live at 2179 40th Avenue in San Francisco.

Saint Ignatius (S.I.) is planning to install permanent 90 foot LED nighttime stadium lighting on their football field **in our residential neighborhood**. SI is proposing these stadium lights to be in use for over 150 nights a year and until 10 pm for most events.

Despite the current COVID-19 crises, Saint Ignatius has been able to move this project forward over a few weeks because one of their stadium light towers will hold Verizon wireless antennas. SI already has existing cell installations on their campus buildings.

During the current stay at home orders, SI is trying to sneak their giant stadium lighting project through the planning process quickly and with as little attention from neighbors and our city officials as possible. **The project has been renamed The Verizon Wireless Project when it is actually a project to install 4 Permanent Stadium Lights with massive impact on our neighborhood so that they can play sports until 10pm during weeknights.**

SI is not acting in good faith or as good neighbors. They scheduled a Zoom meeting as required by the Planning Department. All attendees except the SI staff were muted throughout the entire meeting. Very few of our questions that we pre-submitted were answered. The meeting was ended 20 minutes early with no opportunity for discussion. This is not in the spirit of the public meetings and public input required by SF Planning. SI is currently closed- why the rush to install these stadium lights now? It seems like they are trying to push their agenda through in a time when neighbors have little ability to fight this due to current stay at home orders.

This project is for the private usage of SI. It has no public value. Yet it will have a huge direct impact on the public - our neighborhood and we have no say in how this will be implemented. **These are not the actions of Good Neighbors.**

It's not just about the equipment (lights & cell tower.) It's about how the night activities will affect and disrupt our neighborhood evenings. During these events traffic increases, cars are parked illegally, the loudspeakers are clearly audible from my house, which is two blocks away from the field. There is often a large amount of trash littered on the surrounding streets. The lack of regard by SI for the neighborhood and the neighbors is very clear.

I don't understand the necessity for students to be attending practices for sports until 10pm when the school day ends many hours earlier. When do they do their homework. Education, not sports should be a priority.

Many of us bought our homes with full awareness of SI having weekday/weekend activities during the daytime - but to extend that into the evenings is new and unacceptable. **Please decline SI's request.**

Thank you,
Carole Gilbert

Protests to Against the Saint Ignatius Stadium Lighting Construction Project

Coral Ho <coral_ho@hotmail.com>
Tue 6/2/2020 3:02 PM

Hi Jeffrey & Delvin,

I am the resident of 40th Ave & Rivera Ave. I have been living in that area for 20 years and I am continuing oppose to the light installation project from Saint Ignatius School. The reasons are as the following.

1. If the light installed, the S.I. students will practice at the later time of the day. This would create parking problem in my neighborhood. As of the situation now, S.I. students usually go home around 5pm which will free up the parking space for the neighborhood to park when we go back home from work. However, if they stay late for practice with the lights on, then the parking space will be limited around the neighborhood around 5-9pm.
2. All the games at night time will create noise no matter what you do. Sometime when S.I. rented a light pole for night games, our neighborhood were all affected by the noise that create by the audience that no one can control it. We complain about noise is not based on nothing, we did experience it.
3. This project has been rejected by our neighborhood for 5 years, there are a lot of exchanging ownership for the houses in this neighborhood also. Why the new owners also reject about this project? There is only one reason which is the evening games with the lights on really affect our peaceful life in our neighborhood.
4. According to the letter that S.I sent to us, it states, "We believe this project will be of great benefit to the school and its students, while minimizing any disruption to the surrounding neighborhood." From this, we can see that this project is only benefit to the school and it's students, not for the neighborhood. Also, S.I agree that it will create disruption to the surrounding neighborhood because it stats that minimizing any disruption to the surrounding neighborhood.

S.I hosted a video conference with the neighborhood on 5/2020, however, S.I just express the benefit about the project, they did not let us to express our through and even stop the meeting after lots of neighbor wrote comment on the screen.

This project is only benefit to the S.I and create disruption to the surround neighborhood. As all people know that parking is a very big problem in San Francisco especially at the residential area, with this increasing practice and games happening after S.I install the light, it will get worst, plus the noise pollution from the extra games at evening time is something that no one can control of.

I hope you two can help me to express my concern towards this project and stop it for future discussion.

Coral

# MALMQUIST FAMILY TRUST

Denise Malmquist-Little & Allen Malmquist, Trustees

Messages: 415-665-4746 Email: florence723@yahoo.com Text: 415-601-2313

Attention: Corey Teague, Zoning Administrator, SF Planning Dept.

Corey Teague,

We have owned our family home since 1956, long before St. Ignatius High School bought and developed their present property at 2001 37th Ave SF CA 94116, in 1969.

Our property is in a residential area. Across the street was originally sand dunes. Across the dunes, we had Mark Twain Elementary (later Sunset Elementary), AP Giannini Junior High (later Middle School), and the West Sunset Recreation Complex (now expanded to include not just the rec building, library, playground, tennis courts, and baseball fields, but also soccer fields).

The parcel acquired by SI was, in the time of our home purchase, slated to further expansion of the West Sunset facilities, to include an Olympic sized swimming pool, and more. Never were their plans to include night functions – or more importantly: environment-altering exterior night lights as now proposed by SI.

**We strongly oppose the addition of lights on any height poles or other support system to the SI property.**

**We support the addition of Verizon equipment only if that equipment is on the 37th Avenue (East)side of the property, not along the 39th Avenue (West)side of the property which faces private residences. We would also support a location at the neighborhood garden.**

As a long time SF Catholic family (including a Catholic teacher), it is incomprehensible to us that:

1. SI used a horrific pandemic to push forward a physical plant project not related to safety nor the pandemic
2. SI is trying to pass off the project as a benefit for the neighborhood by attaching it to their own money-making venture with Verizon
3. SI has the nerve to say the project is a deep seeded need so the female population of the student body can have a sports program – a need brought about by SI CHOOSING to go co-ed in 1989 – over 30 years ago!
4. SI held what was to be a public Q/A meeting and

a. Muted all participants not on the SI presentation agenda (this could not have happened in an open actual physical presence meeting)
b. Used 40+ minutes of the allotted 60 minutes to repeat presentations given at past meetings on SI reasoning and Verizon projections and sports light company technology
c. Ignored a number of submitted questions and skirted the issues on those questions claimed to have been addressed
d. Closed the meeting 20 minutes early
    i. without ever acknowledging the 70+ neighbors zoom presence
    ii. nor opening to questions from those present
    iii. nor allowing any discussion of any points brought up during the ZOOM
    iv. nor allowing the discussion of topics important to the neighbors that SI did NOT bring up during the ZOOM

SI's methods and behavior in pushing forward on this project at this time of struggle for all citizens in un-Christian and sets a very poor example for the students of SI. Unfortunately, this is an extension of other failures of problems solving that SI very much needs to address.

We, as property owners, are opposed to the installation of lights on the SI property because

1. SI has already shown a lack of responsibility for their presence in the neighborhood following evening/night gatherings such as dances, plays, recitals, games as witnessed by
    a. The presence of urine left behind by students and activity participants on the private properties adjacent to SI
    b. The presence of garbage, including but not limited to cans, bottles, empty alcohol beverage containers, used condoms, medical gloves, food wrappers, syringes, and more on neighbor property, the public fields, on sidewalks, and in the streets
    c. Breaking of the San Francisco curfew time by youth hanging out in the soccer fields, the baseball fields, and in parked vehicles in the neighborhood
    d. Drug use by minors and other event attendees as witnessed by the scent of marijuana in the air, smoke presence from cigarettes and vaping devices
    e. Light, noise, parking violations, and other disturbances to the home life of the neighbors on Quintara & Rivera Streets, and on 39th Avenue, and Sunset residents beyond the border locations.
2. In researching the sale value of our property, we have been told by real estate professionals that the properties adjacent to SI are not appreciating in sale value at a level of similar properties farther away from the SI campus. Our tax value increases at the same rate as surrounding homes, but our sales value lags behind specifically due to
    a. the constant lack of parking during school days and evening activities

b. the use of the street by students as a training area
c. possibilities/chances of property damage
d. the disruptions listed directly above under #1.

We also object to the plan for lighting because

1. We cannot find environmental studies on file to show that our property will be safe from
    a. vibrations of boring
    b. underground displacement
    c. ground water disruption
    d. water supply (well at 40th/Quintara & SFWD supply pipes) contamination
2. We are aware of the neighborhood disruptions of light, noise, traffic, garbage, etc., caused by the field lights at South Sunset Playground and do not want the same disruptions in our neighborhood.
3. We do not want large supply vehicles damaging our street surfaces.
4. We do not want construction noise during the day, evening, or nights
5. Construction always brings about disruption of rodents … we don't want rodents on the move.
6. We do not see an environmental study for
    a. Animal habitat and life cycle safety affects
    b. Plant endangerment or disruption due to
        i. increased dirt in the air
        ii. changes in light cycles
        iii. changes in ground water movement
7. No other high school in SF has needed to put in lights for night games in order to have a successful and student-fulfilling sports program
8. No other high school in San Francisco has lights on its field for parent group activities, etc.
9. We do not see a lighted field with 150 night uses going to 10pm with participants hanging in the neighborhood unsupervised for hours followed the night activity in the field as good for the neighborhood, but do see it as harmful.

We do not see SI's actions nor attitude as being in any way "good neighborly." We feel that SI has not acted nor is acting in "good faith." We see no benefit for ourselves or the public in this project; the only known value is private and financial for SI. As long time property owners, we feel not only ignored but rudely dismissed. We do not see any neighborhood welfare consideration in the plan nor the actions of SI.

We plan to fully participate both independently of and with the Si Sunset Neighbors group in protesting and stopping the SI lighting project.

For the Malmquist Family Trust,
Allen Malmquist, Trustee, & Marie J. "Anita" Malmquist, Trustee & Resident

*Denise Malmquist-Little*
Denise Malmquist-Little, Trustee

To: SF Planning Commission,

We are against the lights at SI. We are against what affect this will have on our neighborhood. We are against lights being on for many hours after sunset many days of the year.

While it's true that many houses were bought after SI was here, the fact remains that when we bought, there was no practice field with lights on most nights until 8:00 and all practices and games were during daylight hours. I know that when girls joined the school it doubled the sports teams, but this greatly affects neighbors much farther than the surrounding blocks. In addition, SI rents out its fields to other groups and I'm sure that will become a more frequent practice when the field is accessible day and night.

I live on 36th Ave directly across from the practice field. This is an example of the view from my house when they brought in temporary lights last fall

And this is my usual view

And this is me in the middle of my house with all the lights off

I have nothing against SI.
My girls went there and got a great education. I just don't want to have lights shining in my house and blocking my view of the ocean and sunset every night for practices and on weekends, possibly even during the summer if they rent out the field.

Please vote against lights at SI.

Debbie Montarano
SI neighbor

## Horn, Jeffrey (CPC)

**From:** CPC-Commissions Secretary
**Sent:** Tuesday, May 12, 2020 8:57 AM
**To:** Diamond, Susan (CPC); Fung, Frank (CPC); Imperial, Theresa (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC)
**Cc:** Horn, Jeffrey (CPC)
**Subject:** FW: Regarding Planning Department record number 2018-012648CUA

Josephine O. Feliciano
**Commission Affairs**
San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.9111 | www.sfplanning.org
San Francisco Property Information Map

**REDUCED CAPACITY DURING THE SHELTER IN PLACE ORDER --** The Planning Department is open for business. Most of our staff are working from home and we're available by e-mail. Our Public Portal, where you can file new applications, and our award-winning Property Information Map are available 24/7. Similarly, the Board of Appeals and Board of Supervisors are accepting appeals via e-mail despite office closures. To protect everyone's health, all of our in-person services at 1650 and 1660 Mission Street are suspended, and the Planning and Historic Preservation Commissions are cancelled until April 9, at the earliest. Click here for more information.

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**From:** Jon LeFors <jon.lefors@outlook.com>
**Sent:** Monday, May 11, 2020 1:45 PM
**To:** CPC-Commissions Secretary <commissions.secretary@sfgov.org>
**Subject:** Regarding Planning Department record number 2018-012648CUA

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Greetings

I am writing in regards to record number 2018-012648CUA, the St. Ignatius College Prep at 2001 37th Avenue request to install LED lights on their main sports field. I have six main areas of concern regarding the project (See below).

1. **Parking:** Parking is already an issue during the daytime hours with their regular students. I have lost track of the number of vehicles I have had to tow so that I could get out of my garage. Based on my weekend experiences with kids / parents attending events at the school, who are less familiar with the neighborhood and the parking rules, it will be a nightmare when there are events in the evening. I have already had the experience of someone purposely blocking my driveway knowing that I wouldn't be able to get parking enforcement here before they were done with their event. All of the above will be further exacerbated by the fact that there are far fewer parking spots available in the evening due to folks coming home from work and parking on street. Families on my street have a lot of vehicles, with five and six cars for two of the households, so this is a big deal.

2. **Traffic:** As with parking, this is already a madhouse in the morning and when school lets out. Parents regularly pull to a stop in the middle of the lane on Rivera to drop off and pick up kids, often on both sides of the street at once, making it scary / dangerous to get past. The traffic coming off of 37th onto Rivera is aggressive, not wanting to wait for a break, so they often pull in front of cars with the right of way. When there are sporting events it is not uncommon for one of the team busses to be double parked on Rivera between 37th and 38th, visually obscuring two cross-walks and the exit from the St. Ignatius parking structure. Getting past the bus requires pulling into oncoming traffic. And so on.

3. **Pedestrian Safety:** I am really thinking of myself (And my dog!) here, but the issues impact everyone walking in the area. Other than the crosswalk at Sunset, where there is a signal, and walk/don't-walk signs, all of the other crosswalks are uncontrolled. In the case of the ones at 37th and 38th there aren't even stop signs on Rivera, so pedestrians are reliant on motorists seeing them. Seeing people waiting to cross before they are already in the lane, everywhere except at Sunset, is very difficult / impossible, especially if SUV's are in the adjacent parking spaces. Add in the urgency on the pedestrians part to get to class / the game / practice and it gets dangerous. The final pedestrian danger zone is the exit from the St. Ignatius parking structure / campus onto Rivera as there is not stop sign for those exiting, and poor visibility for those entering. Even though the exit crosses the sidewalk, and pedestrians have the right of way, vehicles are often aggressive here and expect pedestrians to yield.

4. **Noise:** My house was built in 1946 and try as I might, it is proving very difficult to soundproof. As it stands now I hear everything for any of the events; every starters pistol, every coaches whistle, and every song when they just have music on during practice. Closing all of my windows helps, but not enough that I can't still hear everything over the sound of my stereo or TV. Having this noise continue into the evening hours when I am trying to relax would be very objectionable.

5. **Litter:** I have gotten used to the amount of litter the students generate and have accepted that it will never go away. I have also accepted that St. Ignatius would never send students or their own people out to pick things up, which is unfortunate. What I have noticed on the weekend events is that the parents are the real problem, leaving beer and wine bottles, pizza boxes, grocery sacks full of tail-gating trash, dirty diapers (Really), etc. This really gives me the sense, more than anything else, that they think this whole area is just a parking lot. And this is during the daytime.

6. **Communication with St. Ignatius:** I attended several community meetings with St. Ignatius soon after I bought my home in 2013. I found St. Ignatius to be less than candid, manipulative, and entirely self-serving. They said whatever they needed to in order to get us out of the room. They cried poverty at any suggestion that they spend money to address a problem. They don't want to take responsibility for anyone they loan their field to. Etc. If I thought there was a chance at an honest dialog, where my/our concerns could be heard and accepted as anything other than an impediment, I would be more willing to go along with their plans.

In summary, **please do not approve their request to add lights and hold more nighttime events.** I feel that there are too many existing issues with St. Ignatius as a neighbor to introduce even more with night activities at their main sports field.

Regards,

**Jon LeFors**
2936 Rivera Street, San Francisco CA 94116
C 415-847-5975

## Horn, Jeffrey (CPC)

**From:** Nina & Jay Manzo <nijaymanzo@yahoo.com>
**Sent:** Friday, May 01, 2020 10:08 AM
**To:** Horn, Jeffrey (CPC)
**Subject:** St. Ignatius Stadium Lighting 4/29 Community Meeting-- Proper procedure not followed.

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planner Horn,

In reference to the St Ignatius' community zoom meeting on 4/29 concering stadium lighting at the SI playing fields. **It appears that proper project procedural steps were not being followed. The meeting should be considered invalid.** Tom Murphy from SI who led the zoom meeting, rushed the meeting, ending it twenty minutes early and did not attempt to answer any of the participant questions from the neighbors. Only some questions submitted in advance were answered. This is not the way to hold a community meeting and it was a meeting in bad faith. Many came away from the meeting stunned at SI's behaviour. **It is obvious that a zoom meeting is not the way to conduct this kind of community outreach and participation.** Many residents are left out of participating if they do not have the current technology. **The meeting should be redone once the Shelter in Place is lifted and the Planning Commission Hearing should be rescheduled as well.**

As a neighbor of this project (within 100') and a practicing architect in San Francisco-- I oppose it--The lights are out of scale with the neighborhood and more night games have more disruptive impact on the community. I'm very concerned that the SI Field lighting proposal has been approved to move forward without the due diligence that is owed to the community.

The lack of information warrants that the City hold off on approving this project, especially given the current shelter in place order which by definition limits community involvement and input.

Does SF Planning Dept have the following information that can be shared with the community?

1. SI needs to provide light levels, light trespass and overall photometric light studies showing the light that the immediate community will recieve. Previous community meetings requested this information-- **This was not presented in the 4/29 meeting. Merely saying that it has been done is not the same as producing the studies. Only aerial views were presented and these were not convincing.**

2. SI need to provide to the community a site section drawing showing scale of poles in reference to the houses across the street on 39th and on Rivera. **This was not presented in the 4/29 meeting. No daytime renderings of all four proposed lights from street level were shown. Only Verizon presented a street level view but it did not show the scale of houses across the street.**

3. The Verizon proposal for providing more cell service was unconvincing. The Verizon service proposed coverage map only provides more coverage for what is mostly the West Sunset Baseball and Soccer fields. Playing fields don't need essential service.

**How can residents judge the scale of the poles if they are not properly shown from the street level at all? Multiple daytime views are required.**

Overall **this is a woefully incomplete set of documents to put in front of a community** and a poorly conducted meeting by SI--it does little to relieve any apprehension about the lights being proposed. It

does show that SI has not really taken the communities needs seriously nor have they listened to their concerns. A unprecedented situation is being used to their advantage. The rushed pace of 4/29 meeting only underlined the sense that SI is not interested in our community. SI's gain is at the communities' loss.

**SF planning should not support this application as it does not benefit the community. This is a project that is out of scale with the neighborhood context and degrades it with increased noise, light and traffic pollution. It will be disruptive as it increases times of field use in the evening when local families are eating and resting. It will have an overall negative impact on residents' daily life.**

It is surprising that SI which touts itself on being community oriented is completely tone deaf in responding to the concerns of their neighbors and has made little progress in working with the community. Instead they have merely rehashed a previous submittal in hopes that we are all too distracted.

**We ask that you invalidate SI's 4/29 Community meeting on grounds of improper procedure--it should be redone properly and the 5/14 Planning Commission Meeting should be rescheduled until after the shelter in place is lifted. SI needs to provide better information to the community.**

Yours,

Jay Manzo
Please feel free to contact me.

## Horn, Jeffrey (CPC)

**From:** Jay Manzo <jay.zomanzo@gmail.com>
**Sent:** Monday, June 08, 2020 2:24 AM
**To:** Horn, Jeffrey (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Diamond, Susan (CPC); Fung, Frank (CPC); Imperial, Theresa (CPC); Johnson, Milicent (CPC); Mar, Gordon (BOS); Marstaff (BOS)
**Subject:** Please reject Saint Ignatius Stadium Lighting Proposal

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commission Members,

As a resident of the area around Saint Ignatius High School, I respectfully urge you to reject this proposal for stadium lights for the following reasons:

1) Speaking as a practicing 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 in this modest community. **SI has not even provided the community with renderings that show the full context of the 90'-0" light masts as the presented renderings conveniently omit the homes along 39th Street. This is because if the houses were shown, everyone would realize how massively out of scale and forbidding these lights will be. Out of character and looming, they will be blight to the community and city as a whole by changing the quiet character of the residential neighborhood. I do not think that this is the city that many residents want to live in.**

verizon
Sunset & Noriega Site # 255926
2001 37th Ave.
San Francisco, CA
2/6/20
Looking Northeast from 39th Ave.
View #2
insight photosim (707) 315-1585

t

2) **This is a Conditional Use Application but this project does not serve the public community or neighborhood --the main criteria for a conditional use application.** SI is a well known private school and is being mischaracterized by Planning as just a "neighborhood school". It is not a "neighborhood school" by any stretch of the imagination. It does not serve the community-neither its fields and pools are available to the community (except for swim lessons) and a sizeable percentage of the students are from places outside San Francisco.
This project does not meet the criteria of a CUA: The proposed lights will be used to 10pm degrading the public environment with light pollution 200 nights a week. The public is not served well-- The lights are only of benefit to SI. All the externalities of trash, noise, glare and traffic at night are the detriments that will be left for the public to suffer.

3) **SI plans to have Friday Night games that will only bring more people (2000 estimated--1000 more than current), traffic and noise and pollution to a residential area seriously degrading our neighborhood peace and health on a day that most folks want to have a quiet evening to start the weekend.** By moving to later games, SI will increase the traffic,noise and light pollution periods. **The project increases in traffic and people cannot be characterized by Planning as having "no change"--there will be a detrimental impact to the community**. Planning has not seriously addressed this increase.
Lightwise, SI has not provided convincing photometric studies--indeed Planning has not shown that the lights meet the CalGreen requirements (Adopted by SF) that limit footcandle trespass beyond property lines. The proposed photometrics are in excess of the Calgreen values. In addition, Verizon can probably find other areas for antennas **without lights** on SI property.
Day games as currently done are the best solution for the community; neighbors have communicated this to SI. The public is not served well by night games--our peace and quiet on Friday nights will be further changed with increased noise, traffic, light, and many times trash.

4) A personal note--I am an amateur astronomer-- I take great pleasure in using my telescope to show my sons and our friends the great skies we are so blessed to have out in the Sunset. At twilight we can see the phases of Venus. Jupiter and Mars can sometimes be seen at 8pm on winter and spring nights. San Francisco is a great city with a magnificent connection to the natural world. **Creating an environment with 200 nights a year of glare and light pollution until 10pm will take this privilege of starry nights away not only from me and my children, but from all the neighbors and their children.** (Unless you are staying up.) **This is just so a private school can have the games and practices at their pleasure--at the expense of the public's quality of life and a beautiful dark sky. This is not fair to the citizens who make their home here.**

Thank you,

Jay Manzo

May 5, 2020

Jeffery Horn
Senior Planner
San Francisco Planning Department
1650 Mission Street
San Francisco, CA 94103
Jeffrey.Horn@sfgov.org

Re: Conditional Use Application 2018-012648CUA at St. Ignatuis College Prep J.B. Murphy Field

Dear Mr. Horn,

My name is Joy Chan, our family lives in the Sunset District at 2819 Rivera St., right across from the St. Ignatuis (SI) College Prep J.B. Murphy Field, the outdoor football field. I am writing to strongly oppose the conditional use application for SI to install four (4) 90' permanent stadium light poles and one (1) Verizon wireless telecommunications services (WTS) facility antenna on one of the poles, at their football field. We want to express the following concerns prior to the May 14, 2020 Public Hearing Meeting:

1. The installation of these 90' light poles will have adverse and negative effects on the surrounding neighborhood. Sunset district is a residential neighborhood with mostly 2 to 3 stories high single-family houses and some multi-family units in specific zones like along Judah St. and Taraval St. The **proposed light pole of 90' is 3 times higher than the houses in the entire Sunset area**, even higher than any of the building structures at SI. This has a negative impact of the view and feel of the neighborhood and disturbance on the skyline. We understand that SI claims the higher the light pole, the more the light will shine down to the field and not to the neighbor houses. Our question is why do they need the lights?

2. Sunset district is a quiet residential neighborhood, where many of us come home at the end of a typical long workday to have some quiet and restful time. SI is proposing these stadium lights, allowing them to use for over 150 nights a year, i.e. almost every other day, and until 10 pm for athletic and other events. This will disturb the quietness of the neighborhood, **impose unnecessary noise and light pollution to the surrounding environment.** Also, not to mention, this will lead to other issues like parking, traffic control, safety, and environmental cleanliness. With years of living in this neighborhood, we tried to be good neighbors and bear the disturbance from all these issues. Regretfully to say, SI only manages their facility and immediately in front of their buildings, they do very little to manage those issues that bleed to the surrounding streets.

3. Although this project may meet minimum standards of the Planning Code, please consider why this project should be approved. SI is a high school and this football field facility is for their SI affiliated usage only, i.e. that is for a small group of San Francisco community (mostly affluent families) and **has no benefit to the general public**. Also, we have observed and did not find other public high schools in the City installed stadium lights and are using them for a considerable amount of nights throughout the year.

4. As this is a high impact project to the area, SI was meeting the Planning Department's requirement to host a Neighborhood meeting on April 29, 2020. However, in our opinion, the meeting was not successful and did not meet its original intent. We are aware that many of the neighbors felt the same way. For the scheduled 60 mins online meeting, SI allocated 15 mins for presenting the lighting design, 15 min for speaking about the Verizon plan, and with 20 mins left, Tom Murphy, SI Marketing and Communications/Project Lead, did not allow the attendees a Q&A session due to technical difficulties, he claimed. Despite the fact that technical difficulties might be true, our neighborhood organization sent a list of questions prior to the meeting and Tom could have used the time to answer those questions. Tom did not and claimed those questions are not directly related to the project. We feel **SI is not acting in good faith in this regard and provide lack of opportunities for the neighborhood to express concerns**, and that defeated the purpose of the neighborhood meeting. They just did the meeting to check the box.

5. Despite the current COVID-19 pandemic when many non-essential projects were slowed down and put on hold, SI tried to move this project forward, partnering with Verizon and combining the lighting project with the WTS antenna to classify as essential for emergency communication infrastructure. They should be considered two different projects. We also want to argue the necessity of additional WTS facility in the area. Looking at the Wireless Telecommunications Facilities Map available on SF Planning's website (see map below), the location of wireless/cell towers appears to be well distributed in the Outer Sunset area. We **do not really understand the need of additional wireless tower and what the benefits will be**. We are not sure if this may be a strategy for SI to partner with Verizon, getting their sponsorship on this project cost, receiving monetary benefits for leasing out the light pole for the antenna use, and using it as a vehicle to move through City's permitting review more quickly as an essential project. We, as general public, need the City Officials' help in keeping public benefits a priority when reviewing projects, if this WTS facility is really deem a necessity.

In conclusions, as a neighbor to SI who will be directly impacted by this project, we want to reiterate our perspectives in seeing the adverse impacts of the project. This project impacts the skyline of the neighborhood, leads to additional noise, light pollution and other issues like parking, traffic control, safety, and cleanliness to the surrounding environment. We do not understand why this project should be approved as it only provides benefits to a private party in the expense of suffering by the general public in the neighborhood. SI is handling this project poorly as reflected on how they ran the neighborhood meeting. They are just meeting the City requirements to host the meeting and check the box, but they do not really care about the neighbors' voices and do not plan to address them. Lastly, we should not let them move this project through quickly by combining it with the WTS facility and marked as essential. These are two different projects and the need of the additional cell tower is still a question.

Please seriously consider our concerns. We look to the City Officials as the subject matter experts and are confident and trustful that you will guard the gate and not approve project that has no benefits but negative impacts to the City in large. I hope this project will be not carried out with a "not in my backyard" manner. Thank you very much for your attention and reading this long letter.

Sincerely Yours,

Joy Chan

Resident at 2819 Rivera St.

Cc: Delvin Washington, delvin.washington@sfgov.org Manager, SF Planning Department
Corey Teague, corey.teague@sfgov.org Zoning Administrator, SF Planning Department

From: **Josette Goedert** <josette.goedert@gmail.com>
Date: Thu, Apr 30, 2020 at 11:14 AM
Subject: Saint Ignatius Record Number: 2018-012648CUA
To: <Jeffrey.Horn@sfgov.org>

Hi Jeffrey,

My husband and I along with approximately 90 other Outer Sunset residents attended the zoom meeting regarding Saint Ignatius' installation of lights and verizon cell towers.

I am extremely concerned because SI touts that they're good neighbors, but they indeed are not. SI made it incredibly difficult to find the zoom meeting notification on their website. You had to go all the way down to the bottom and click on their Good Neighbor Program and then hit the PDF link for the notice.

From there the notice didn't hyperlink the zoom meeting, which is extremely problematic for residents that do not know how or feel comfortable with technology. They also put another hinderance if you wanted to dial-in using your cell phone because the password was mostly letters along with only 1 or 2 numbers. If residents don't understand to input the letter associated with the number then they are barred from entering into this open meeting.

Once in the meeting they muted everyone's microphones on zoom, which I can understand due to the sensitivity of the issue and many residents disdain for their proposal. What I believe is not okay - is having a dog & pony show from the lighting rep along with the rep for Verizon. Yes, the residents need a general understanding of what they're trying to do, but not once did SI respond or answer the questions that were happening in the chat or what was sent to them prior to this meeting. SI also ended the meeting almost 22 minutes early where they couldn't taken the time to respond to our concerns. There is a Public Hearing still scheduled with your office on Thursday, May 14th and it should not still happen!

We did not get anything addressed and my fear is that SI, like usual, is moving through the motions to get what they want. The Verizon rep even said on the call that they do not need 90 foot lights in order to install their 5G technology. They can easily put it on the top of SI like the AT&T technology that already exists. SI is not a public school, so the community will not be able to (nor have we ever) been able to benefit from using their facilities (they closed access to the pool to the neighborhood a few years ago).

At what point do the neighbors get a say in what SI does? They are noisy, inconsiderate, rent out their field every weekend, the students double park or park in our driveways and now they want to incorporate lights that will stay on for almost 120-150 nights a year! When they had the temporary lights in the fall they didn't turn them off when they said they would and would remain on sometimes up until 11 PM. There will be more traffic in the neighborhood at night, less availability for us to park our vehicles near our homes, more noise during the week nights, more light pollution and litter.

We live directly across from their field and know first hand how awful of neighbors SI actually is versus what they say they are. We have 9 month old baby now and do not want lights or 5G technology across from our home as it drastically changes the nature of the Outer Sunset. We'd like to preserve the family oriented environment that has been developing over the years for young families here in the Outer Sunset. Please help us stop these projects!

**From:** "Goedert, Matthew" <mgoedert@nixonpeabody.com>
**Date:** May 5, 2020 at 3:49:00 PM PDT
**Subject: St. Ignatius High School Lighting and Verizon Wireless Proposal.**

Hi Gordon,

I am a Parkside resident. I attended the zoom meeting regarding Saint Ignatius' installation of a Verizon cell tower and football stadium lights. I am concerned about the SI's failure to provide reasonable access and notice of the pre-application meeting. In addition, I am concerned that SI did not address the light issues, existing and increased amplified noise issues, increased parking issues, existing and increased rental of SI's facilities to third-parties or the reason why the Verizon project has been expanded to add football stadium lights when all Verizon needs is one pole or a rooftop to place their equipment.

**Failure to provide reasonable access notice to pre-application meeting**
SI's notice of the pre-application meeting only included a zoom link to participate. SI failed to provide a dial-in number which excluded many of the neighbors from participating. While Zoom does allow for participants to dial-in, SI's created a password for the meeting that included letters along with one number. The meeting code they choose was "suf3ap". By using letters, it barred neighbors from dialing-in to the meeting. I understand that the City's Shelter-in Place Order has caused old protocols to be put on hold; however, the City's order did not relieve SI from using reasonable method for hosting a meeting by simply providing a telephone number. As a result, SI barred a large part of the populations from attending the meeting. Based on SI obligation to provide a pre-application meeting and effectively not provide one on April 29, 2020. The applicate is required to redo the meeting in order to reasonable provide an accessible meeting by providing a telephone call-in number or use zoom meeting with a call-in number that does not include letters in the meeting access code.

**Verizon**
Verizon is considered an essential business. However, the Verizon rep said during the zoom meeting made it clear that they do not need 90 foot football lights in order to install their 5G technology. They can easily put their technology on the top of SI's roof, like the AT&T technology, or use one 45 foot pole. Verizon does not need or want four 90 foot high football lights. SI is trying to use Verizon essential business status from the COVID-19 crisis to add football lights to their football field. By using this status, they would become the only high school in the city to have lights on their football field.

**Parking Issues**
Over the last 50 years, SI has changed from a boarding school for boys to a commuter school with more than 1800 students traveling from all parts of the bay area. This change in their business model has never been addressed. Being a commuter school results in an additional 500-700 cars in the residential neighborhood during the day. SI relies solely on the neighborhood to provide parking for its students. To make parking worse, SI prohibits students from using the parking in the front of the school which push student to park further out in the residential area. The parking issue will only be compound by adding football lights which would include additional cars driven by the parents, family, and friends of the students and visiting teams all trying to find parking. During the zoom meeting, SI failed to address the existing parking issue or how adding additional cars would affect the neighborhood.

**Noise Issue**
The school and football field are on a hill. The speakers used by the public announcement system on the football field are located much higher than the surrounding houses. The noise pollution from the field actually amplifies the sound after it clears the roofs of the nearby houses becomes trapping the backyards of the row houses. This results, the houses closest to the field being having to deal with noise levels that are louder in their backyards than in their front yards. This is problematic because many of us have young children that go to sleep around 7. Our child is unable to take a nap during the day due to the noise levels and adding night activities would result in her not being able to sleep until after 10.

**Lighting Issue**
The lighting diagram only show the direct light being produced in perfect weather conditions. It does not show the bleed of the light based on the actual weather conditions or the reflective light from the metal stadium seats, plastic track, white paint, and plastic football field. Any independent study would show that the houses immediately across the streets would be severely impacted due to the schools use of lighting. There is a reason why no other high schools has football lights. The only football fields with lights in the City are the community college and Kezar stadium. The community college complies with commercial parking requirements, did an impact study, environment study, and doesn't have residential neighbors feet away from their field. As for the other fields that are using similar lighting, they are all open to the public and each have better boundaries between them and residential housing. SI's does not provide access to their fields.

**Rental of SI's facilities to third-parties**
Before the stay at home order, SI's rented out their facilities to third-parties. Making the use of the football an everyday activity The football field was rent out between one to two days a week to third parties. Youth football, flag football, traveling teams, fun runs, SF Giants baseball, and summer camps, all rent out the field and all are not related to the students use of the field. Except for the traveling teams, each start a 7 am and goes to 5-6ish. SI's rental actively likely accounts for more than 20% of the field time. When you add in their other rental activities, SI is acting as a commercial space and not complying with the city ordinances regarding parking. In an effort to rent out the field, SI allows these activities to use the school speakers and lets them know about the free available parking.

**Trash**
SI's has failed to address the trash left by their students or the third-party renters in the neighborhood. SI has set forth no plan to pick up the trash left behind for its existing use or from its increased use.

**Environmental Study Require under the current plan**
The amount of dirt that will be required to be moved for the Verizon building and holes for 90 foot light automatically require an environmental study.

**Existing use permit requires them to benefit the community.**
SI does not provide any benefit to the community. The benefit described on their website require the community to pay full price to attend the sporting activities or theater. Requiring the public to pay for benefits is not a benefit.

SI is noisy, inconsiderate, rents out their field every weekend, the students double park or park in our driveways and now they want to incorporate lights that will stay on for almost 120-150 nights a year! When they had the temporary lights in the fall they didn't turn them off when they said they would and would remain on sometimes up until 11 PM. There will be more traffic in the neighborhood at night, less availability for us to park our vehicles near our homes, more noise during the week nights, more light pollution and litter. I would like to preserve the family oriented environment that has been developing over the years for young families.

Matthew Goedert Sent from my iPhone

**From:** Matthew <mattgoedert@yahoo.com>
**Date:** June 2, 2020 at 10:30:54 PM PDT
**To:** "Jeffrey.Horn@sfgov.org" <Jeffrey.Horn@sfgov.org>
**Cc:** "delvin.washington@sfgov.org" <delvin.washington@sfgov.org>, "joel.koppel@sfgov.org" <joel.koppel@sfgov.org>, "kathrin.moore@sfgov.org" <kathrin.moore@sfgov.org>, "sue.diamond@sfgov.org" <sue.diamond@sfgov.org>, "frank.fung@sfgov.org" <frank.fung@sfgov.org>, "theresa.imperial@sfgov.org" <theresa.imperial@sfgov.org>, "milicent.johnson@sfgov.org" <milicent.johnson@sfgov.org>
**Subject: SI Sunset Football Lights**

I am concerned with SI's summary of their answers to the issues brought up by the neighbors. The problem is SI wants the neighbors to lose their enjoyment of their residential homes for the benefit of their commercial enterprise (it's paying student and third party renters). Their answers to the neighbors' concerns are simply that they are going to interfere with our enjoyment and the neighbors should be happy to lose the ability to enjoy their property.

Their new PR spin is confusing. On the one hand, they say that they won't be expanding their use, and on the other hand, they need to expand their use to handle all of the sports that they added. The fact is the lights will expand their use and change the neighborhood.

My main concern is that they refuse to address their parking issues and have glib answers regarding the light and noise issues. Their light expert was the sale guy. Based on discussions with other lighting experts, they were unable confirm their "expert's" claims and suggested that such results would only be possible in prefect weather conditions. The noise issues are real and will interfere with the neighborhood children's ability to sleep at night. The neighborhood has a lot of children. There are more than 30 kids in the house closest to the field.

Their summary also miss quoted the Verizon speaker who clearly said that Verizon could put their equipment on the roof, but it would slightly change the coverage area. He didn't say that the possible loss of coverage area from the equipment would result in a loss of coverage. In fact he suggested that the roof could be used and that he did not need football lights.

There is a reason why no other school has football lights. There is a reason why parking is required for any commercial space requesting to use space in similar way. There is reason why the school does not want to address the huge parking issue that it currently has and will have it lights are added.

This was a residential area before the school was added. The school's growth should not change the original character of the neighborhood. The school is a tax-free entity that does not have to pay property taxes unlike its neighbors. The City should not be making exceptions to a non-public school that provide no benefits to the neighborhood.

The neighborhood has been an extremely good neighbor to the school. All we ask is that they be a good neighbor to us.
Please vote no to the lights. Or at the very least separate the lights from the Verizon equipment. Matthew

Matt Ciganek <mattc@vanguardsf.com>
Thu 6/4/2020 9:57 AM
To whom it may concern;

Regarding the proposed changes to add lights to the field at SI to create a new night-time event space, I have a few questions for the planning commission.

1) Why was the “call” from SI cut off before questions could be heard? I was on the call and there were many residents with questions being reflected on the “chat” feature. There was no opportunity to ask questions.

2) What is SF Planning’ s threshold for neighborhood input reflecting a negative opinion of the project in the surrounding area by Sunset District residents?

3) If approved, how will this project affect SF Plannings approach to any / all other parks and fields in San Francisco who want to add night lights? Given that LED lights are “affordable” by using less power than traditional lighting and purportedly directed in towards a field or park, isn’t it likely that this type of improvement will be implemented in many other locations? How would that affect public safety in affected neighborhoods at night due to increased activity and light pollution in the city as a whole?

This process feels pre-approved like it’s proceeding through bureaucratic process with no actual consideration of the problems it’s creating. I appreciate that Planning extended the period of time for consideration but this is an exceptional time in all of our lives and this extension is likely not enough for a decision on a project of this magnitude.

The Sunset District is a strong community of residents, students and local businesses. Planning should recognize that this is no longer a sleepy bedroom community on the outskirts of San Francisco. Attention needs to be given to the residents who already have a lot of school events that impact the neighborhood taking place on a year round basis. SI has been here for a long time but that’s not to say their desires are more important than the residents of the community. Changes this impactful should be considered very carefully.

Thank you,
Matt Ciganek
415-240-9901
2064 Great Highway

**Matt Ciganek**
Multi Family / Residential Investment Sales
DRE #01871937
C:415.240.9901
Vanguard Market Reports

Mr. Jeff Horn

City of San Francisco - Planning Department

1650 Mission Street, Suite 400

San Francisco, CA 94103

Tel: 415.575.6925

Email: Jeffrey.Horn@sfgov.org

RE: Conditional Use Permit

2001 37th Avenue

Record Number: 2018-012648CUA

Mr. Horn,

We're in receipt of the Notice of Public Hearing on the referenced project. As a long time resident and home owner in this community, we're accustomed to the vehicles and noise during school rush hours and events. However, we certainly have concern with changes that can exasperate rather than improved the existing condition. The following are concerns regarding the proposed CUP for additional lighting and more critically night activities in our residential neighborhood.

Following are comments and questions to the applicant's Project Application General Information form.

**Project Application Statements:**

**Environmental Evaluation Screening Form**

#8. Air Quality - applicant stated the project will NOT add new sensitive receptors to residential dwellings, and schools within an Air Pollutant Exposure Zone. Has the City analyzed the **air, noise, traffic, and parking impact** from these **additional night activities** to the adjacent residential community? These activities will most definitely negatively impact our residential community's right to peace, and quiet at our most precious wind down time from a day's work.

Parking – City Planners should review the parking impact to the adjacent residential as it is today. During school session, or school sports events, the residential streets are fully occupied by student and event attendee vehicles. With the addition of night activities, residence returning home from a day's work may not be able to find parking space near their place of rest, or can find the driveway blocked.

Lighting – project propose four ninety feet (90') tall light. The proposed light is probably over 4.5 times the height of the residential homes. The light source of these 90' high poles can be in

the direct view line of these homes. Homes along 39th Ave can very well look right into these 90' tall lights. Applicant's graphic presentation presents a controlled light distribution. Please have applicant provide photos of exact similar condition and product to confirm accuracy of the graphic presentation. How high are these 90' tall lights in appearance adjacent to the residential homes?

**Priority General Plan Policies Findings:**

Item#1 – Applicant's stated that the lights and additional activities will bring people to the neighborhood is correct, but that is precisely the concern the community has with an influx of people, cars, noise, into the residential neighborhood during a period most family desire quiet enjoyment of family time. Also the statement that local restaurants will benefit from these increased traffic does not seem to be correct, as it appears that a majority of event attendees immediately depart from the Sunset District.

Item#2 – Can applicant provide data and events that occurred during the past minimum two years on under privileged youth activities utilizing the fields?

Item #8 – Can applicant clarify the statement that this project will enhance the use of West Sunset soccer fields and reduce traffic in the area on Saturday. How does the additional separate activities on the SI field reduce the traffic on the soccer fields?

Regards,

Mr. Chu

2235 38th Ave

Will residence look right into these lights?
How tall are these lights adjacent to residential homes?
F1
F2
F3
F4
Bleachers
St Ignatius Prep School FB/S
San Francisco,CA
EQUIPMENT LAYOUT
INCLUDES:
- Bleachers
- Football
- Soccer
- Track
Electrical System Requirements: Refer to Amperage
Draw Chart and/or the "Musco Control System Sum
for electrical sizing.
Installation Requirements: Results assume ± 3%
nominal voltage at line side of the driver and structu
located within 3 feet (1m) of design locations.
EQUIPMENT LIST FOR AREAS SHOWN
Pole
Luminai
QTY
LOCATION
CLASS
GRADE ELEVATION
MOUNTING HEIGHT
1
F1
LSS90C
-
15'
65'
90'
1
F2
LSS90C
-1'
15'
64'
89'
2
F3-F4
LSS80C
7'
22'
65'
87'
4
TOTALS
SINGLE LUMINAIRE AMPERAGE DRAW CHART
Ballast Specifications
Line Amperage Per L
Single Phase Voltage
208
220
240
277
TLC-LED-400
2.5
2.3
2.1
1.9
TLC-BT-575
3.2
3.0
2.8
2.4
TLC-LED-1150
6.8
6.5
5.9
5.1

Will residence on 39th Ave look into this?

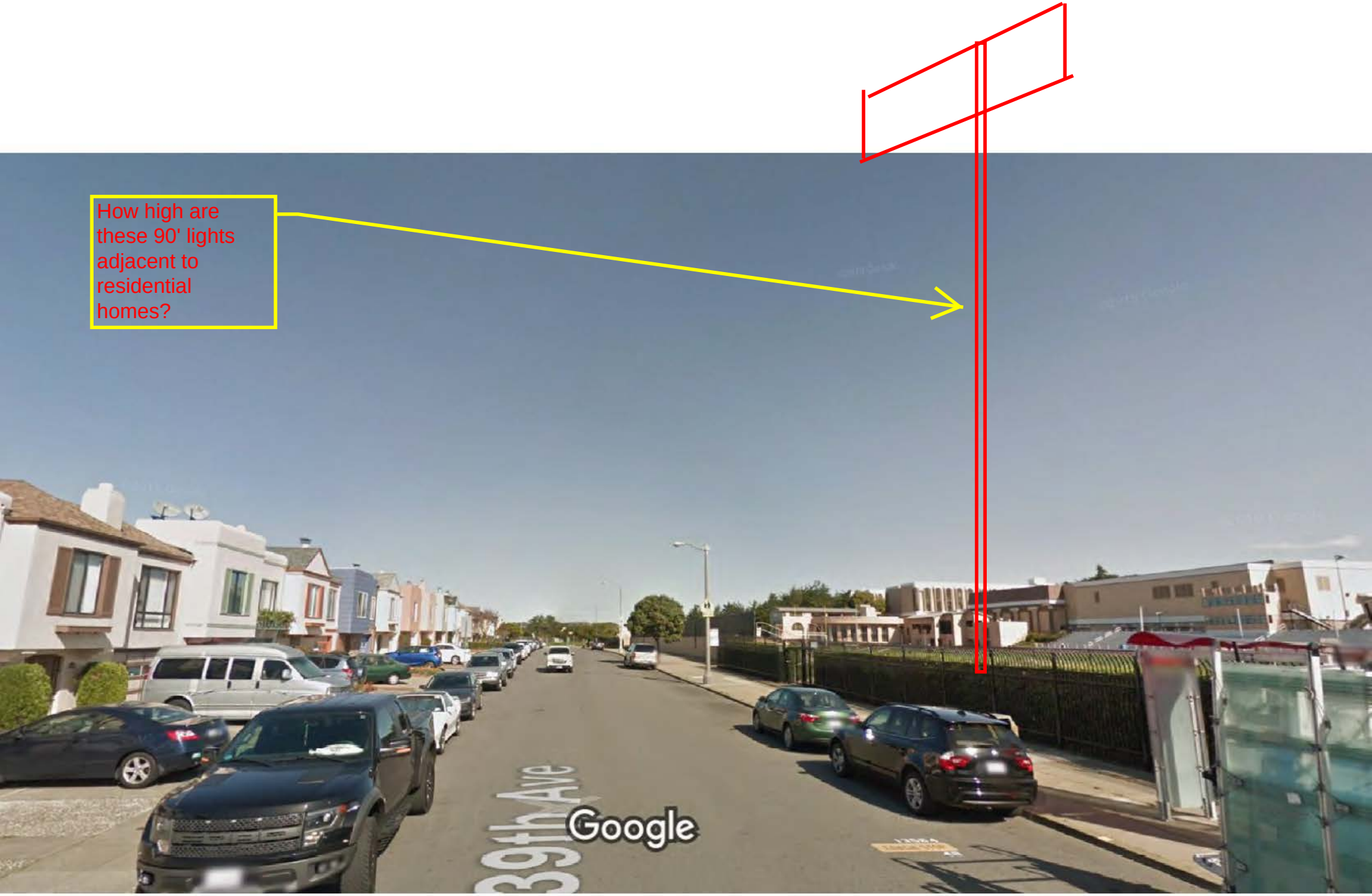



Image capture: Feb 2015 © 2020 Google

## Horn, Jeffrey (CPC)

**From:** Nina & Jay Manzo <nijaymanzo@yahoo.com>
**Sent:** Wednesday, May 06, 2020 4:33 PM
**To:** Marstaff (BOS); Horn, Jeffrey (CPC); CPC-Commissions Secretary
**Subject:** S.I. Stadium Lights in Context
**Attachments:** 200506 SI LIGHTS SITE X_SECTION 39TH AVE.pdf; 200506 SI LIGHTS SITE X_SECTION 39TH_40TH AVES.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planner Horn, Planning Commissioners and Supervisor Mar,

As a homeowner with a family and two children living near S.I., I want to tell you that I am strongly opposed to the proposed stadium lights and cell antenna project. I hope you understand how distressing this proposal is for nearby residents, especially having it reviewed during these difficult times in which we are already experiencing great stresses and uncertainty. To see the peacefulness of our homes threatened by this project is extremely disturbing. **This project will be a massive visual blight to the neighborhood, as well as impose so many additional nuisances (like traffic, parking issues, light pollution, noise, litter, etc).**

I can't understand how the Planning Department or Commission could even consider this project, as it doesn't meet the requirements of a Conditional Use Permit per the Zoning Code. Even in the recent community Zoom meeting hosted by S.I., there was no mention of how this project would be desirable for, compatible with, or serve us non-S.I.-affiliated residents here the neighborhood (see SF Planning Code Section 303(c)).

As an architect I think often about the message that the built environment expresses. These **grossly out-of-scale light poles and antennas**, erected by Verizon (certainly at a great profit in terms of rental income to S.I.) send the message that this private institution, with very little neighborhood basis, values their own needs and profits far above the interests of the surrounding community. The significance of private organized sports and cellular communications, as embodied in these massive towers, will be looming over all of us in the area. It will be seen and felt constantly from our front yards, our rear yards, our decks, our living rooms, dining rooms and bedrooms. The brilliant LED light-throw, cheering crowds, and amplified announcements will reign over our family dinners and the evening down-time we and all our neighbors want to enjoy at home. And the 5G cell antennas (with there as-yet-unknown health impacts) will be running constantly 24-hours a day over the heads of all our neighborhood children.

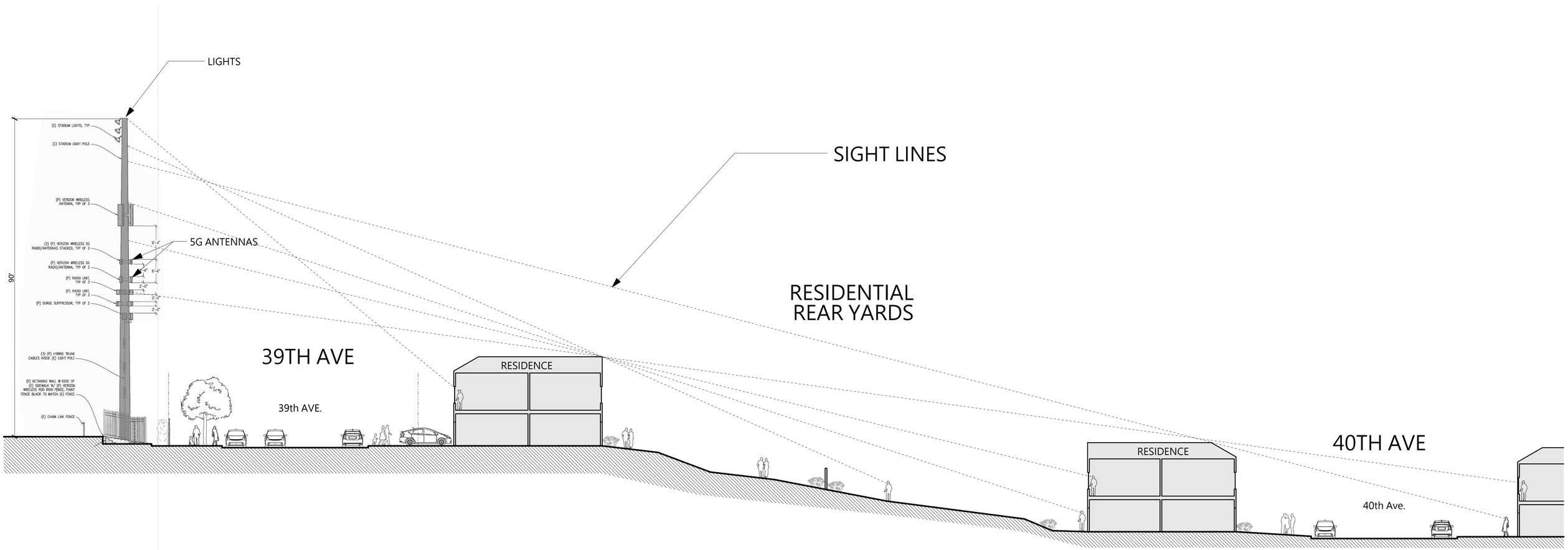
Please do not approve this unfortunate proposal! Let's not see this neighborhood spoiled by this. So many other San Franciscans visit these few blocks when using the public facilities at West Sunset Soccer and Baseball Fields, as well as the West Sunset Library, AP Giannini (where one of my sons is a student), Sunset Elementary, and even the West Sunset Community Garden (which we belong to). They will be walking beneath these gargantuan looming private towers which are so **extremely out and character with the surrounding neighborhood and larger Sunset District**.

Please see the attached drawings I prepared which show Verizon's poles and antennas drawn to scale, and put into the neighborhood context. Such drawings were not provided by S.I., but I wanted to see the actual impact to our neighborhood, in terms of height, bulk, and sight lines. You can see how **out of scale with the neighborhood the proposed lights and antennas are.**

Thank you for considering my concerns.

Sincerely,
Nina Manzo

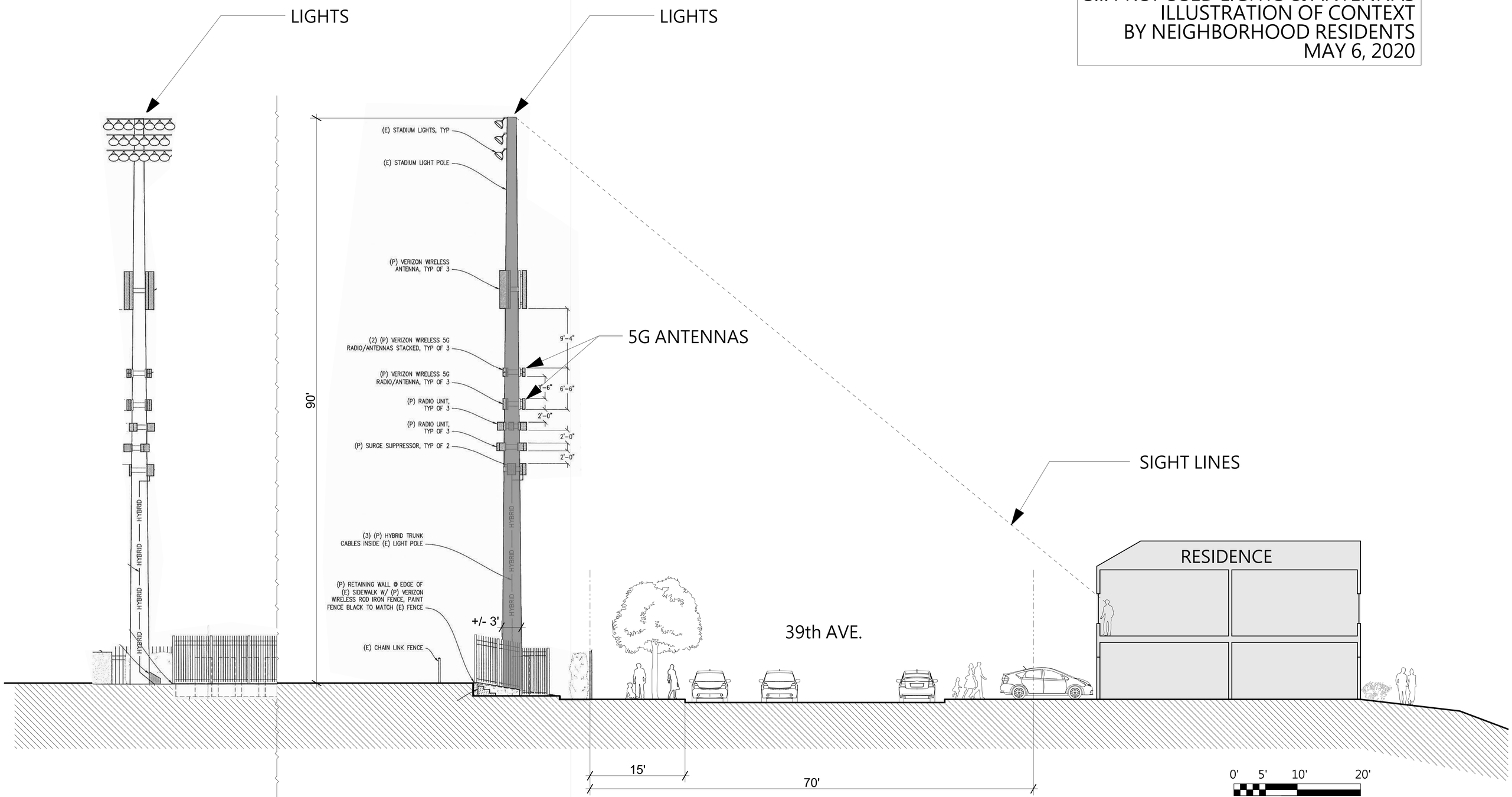
S.I. PROPOSED LIGHTS & ANTENNAS
ILLUSTRATION OF CONTEXT
BY NEIGHBORHOOD RESIDENTS
MAY 6, 2020




LARGE-SCALE SITE CROSS-SECTION
LOOKING SOUTH
W/ SIGHT LINES

# 39TH & 40TH AVENUE VIEW

S.I. PROPOSED LIGHTS & ANTENNAS
ILLUSTRATION OF CONTEXT
BY NEIGHBORHOOD RESIDENTS
MAY 6, 2020




POLE EAST ELEVATION
PER SHEET A-5

SITE CROSS-SECTION AT POLE
PER SHEET A-3
LOOKING SOUTH

# 39TH AVENUE VIEW

<villageattab@yahoo.com>

I live on 38th ave between Ulloa and Taraval and I am deeply concerned and disappointed that such a school as St. Ignatius had decided to put invasive lights on the football fields that will surely, as they know well, will disturb the peace and harmony of the neighborhood.

They already have a stike against them by putting an giant artificial turf that gives you virtigo if you walk by the school and especially on a sunny day, the smell of chemicals from the turff is suffocating. The night lights will cause disturbance after the sunset to neighbors and birds on the trees of the glorious Sunset Avenue.

The crowd will cause noise also, more traffic at night and many other problems. St. Ignatius isn't a sports school, it is an institution to educate, they don't have to push it that much to the point of having night lights. As a long standing school, they should keep to the tradition of respecting the neighbors over profits.

Nafiss Griffis

## Horn, Jeffrey (CPC)

**From:** Peter Koch <kochsf@att.net>
**Sent:** Thursday, June 04, 2020 9:52 AM
**To:** Horn, Jeffrey (CPC); Teague, Corey (CPC); Hillis, Rich (CPC); Washington, Delvin (CPC); Koppel, Joel (CPC); Marstaff (BOS)
**Subject:** St. Ignatius High School Lights Project

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Good Morning,

I hope you are all healthy and safe. My name is Peter Koch and I live at 2825 Rivera St. SF. CA I want to express my deep concern and opposition to the proposed lights project at Saint Ignatius High School.

I have been living in front of this athletic field for close to 30 years and this proposal worries me and my family greatly ! Over the past several years SI has increased their use of the field to include both Saturday & Sunday events . The parking and Traffic along with the noise on a Sunday morning is horrific.

This proposal to have Friday night football games, along with maybe 2,000 fans , in this quiet residential neighborhood is unbelievable. Saint Ignatius has no right to impose on this neighborhood events that will so dramatically alter our lives and change the feel of this quiet community.

Also, they have done a poor job in addressing our communities concerns regarding Traffic, Noise, Parking , Light Pollution, Garbage. I also have grave concerns regarding the 5G network proposed on one of the lite towers. There have been no answers to our questions regarding the safety of these fixtures.

I am vehemently opposed to this project and also the way Saint Ignatius has disregarded the concerns of this neighborhood and community.
Please hear our concerns !!!

Stay Healthy & Safe,
Peter & Sandy Koch

To whom it may concern,

I, Randall Hung and the rest of my fellow neighbors feel strongly against Saint Ignatius' plans for their new proposed stadium lights. Everything about this was poorly conducted and planned, from the initial start of the project to their so called community outreach conducted over Zoom. We were promised an hour long meeting with a time slot for us to ask questions/express concerns. We were all muted during the meeting, which I understand, but we were prompted kicked off after 40 minutes without being able to ask questions. I would not even call it a meeting, it was a sales call informing us about the companies advancement in technology, which has absolutely nothing to do with us nor the project. We feel that saint Ignatius is not acting out in good behavior and will do whatever they feel they are entitled to.

We have expressed our concerns about parking, noise pollution, garbage pollution, and light pollution. How will Saint Ignatius work with the neighborhood on these topics and many more? How will Saint Ignatius monitor and control traffic? Where will we park when we come home? Who will clean up the garbage that the parents, teachers, and students will cause? We already run into issues with parking and garbage pollution. We do not want or need anymore.

Saint Ignatius claims to be a neighborhood friend, but unfortunately, they are not. Few years back, as a compensation to our concerns, they offered us tickets to their games and school events. Is that all we're worth, free tickets? To them, we are just a joke and only in their way of getting what they want. Other schools already send their students off campus for games/practices during school, why does Saint Ignatius feel that they are above everything else? Entitlement.

Sincerely,

Randall Hung

## Horn, Jeffrey (CPC)

**From:** seiko grant <sgrant654@gmail.com>
**Sent:** Thursday, May 07, 2020 7:28 PM
**To:** Horn, Jeffrey (CPC)
**Cc:** Teague, Corey (CPC); Washington, Delvin (CPC); Hillis, Rich (CPC)
**Subject:** Conditional Use Application #2018-012648CUA

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

From:Seiko Grant
2931 Rivera St.
San Francisco, CA 94116
05/01/20

To: Jeffrey Horn, Senior Project Planner
SF Planning Dept.
1650 Mission St
San Francisco, CA 94103

Re: Night Lighting at Saint Ignatius College Preparatory

Dear Jeffrey Horn,

My name is Seiko Grant and I have lived in the Sunset District for 56 years, 53 of those in my current home at 2931 Rivera St. During this time I watched Saint Ignatius College Preparatory (SI) high school being built and transition from an all-boys to a co-ed school. The residents adjusted to the increasing traffic,parking issues and weekend noise from events at the J.B Murphy field. We could always depend on a return to quiet streets in the evening after a full day of work and to get to sleep in preparation for the next day. This is a basic condition that everyone, including all of you in the planning department, needs for a healthy existence.This is why we chose to invest our money and spend our lives here. Our homes provide a space to rest and gather comfort. Our neighborhood is a source of support and safety.We feel very fortunate.

Saint Ignatius College Preparatory school (SI) is planning to install permanent night time stadium lighting on J.B Murphy field using LED lighting on poles rising 90’ high. They anticipate use of the lights for over 150 nights a year and until 10:00 pm in most cases.The administration at SI have not been forthcoming about the specifics of this proposal. Details have been changing in every announcement ( initially they stated only 10 night events a year) and emerging sporadically. Though legally required meetings have been held and advisory notices distributed, feedback from residents affected by this plan is not given much weight as this project is considered by SI as destined to be completed according to their wishes. In enlisting a telecommunications provider, Verizon Wireless,to install a series of antennas to one of the proposed 90’ light poles, the project may be considered an essential service and thus fast-tracked even during the shelter-in-place order. One of graphics, presented by the Verizon representative to demonstrate how the proposed installation would remedy a lack of coverage to access wireless services, revealed that only the baseball fields at West Sunset recreation area and part of Sunset Blvd had less coverage. The Ortega library and neighboring homes have very good wireless connections and nothing additional is needed in the open fields.

Light pollution,noise pollution and increased traffic to the extent that they would significantly effect living conditions for a large number of residents and avian life in the area surrounding the J.B.Murphy field are of great concern. A thorough

investigation into these effects including a full environmental review in accordance with the California Environmental Quality Act must be conducted. I strongly object to the exemption from environmental review. On the one hand, in the conditional use application, SI states that " Traffic will not be increased, as persons already attending the school will use the field." In the project application, they state that " The lights bring people to the neighborhood.." and " the field is used by a variety of non-profit institutions…". These conflicting statements must be resolved. A greater number of night events will definitely increase traffic.

One reasoning for SI wanting to go forward with this project as stated by their representative,
Mr. Tom Murphy, in the online meeting of 4/30/20 is to allow a later start time of the school day quoting studies showing later sleep cycles for teenagers. Again in the project application ,"..providing greater opportunities for students to have adequate sleep." Mr. Murphy also mentioned that night games during the week will allow those families to have weekends free and reduce traffic on Saturday. Would that they have as much concern for the weekends and sleep time of the neighborhood residents to whom they say they want to be good neighbors. The enhanced educational experience desired by SI would be better served by teaching the students time management and that participation in extra curricular activities require adjustments which may not always be convenient.

There is no other school in San Francisco, public or private, which has lighted fields on their campus. All those schools continue to provide excellent educational experiences without negatively disrupting the lives of the neighborhood. There was no discussion or questions allowed at this meeting that were not "related to the project". I consider the concerns of the residents living around the field directly related to the project.

Any other parks in San Francisco with night lighting are open for use by the general public.
The "expanded use of existing open space" at J.B. Murphy field is restricted to the students/families of SI. The cost, including reduced property values, will be born by the entire neighborhood. I object to the proposed night lighting on the fields at Saint Ignatius College Preparatory and request that this commission decline to approve this project.

Sincerely,

Seiko Grant

## Horn, Jeffrey (CPC)

**From:** seiko grant <sgrant654@gmail.com>
**Sent:** Thursday, June 04, 2020 12:10 AM
**To:** Horn, Jeffrey (CPC)
**Subject:** 2018-012648CUA

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

SF Planning Dept.
1650 Mission ST #400
SF, CA 94102
6/2/20

Seiko Grant
2931 Rivera St.
S.F., CA 94116

Re: case# 2018-012648CUA
Response from Saint Ignatius College Preparatory

This case involves proposed night lighting at J.B.Murphy field in the middle of a residential neighborhood for private use by the school. Many residents in this neighborhood raised objections and questions which these letters claim to address. I found the responses to be inadequate in light of the permanent and significant negative effect this project will have on the neighborhood.

In these letters, representatives of Saint Ignatius College Preparatory (SI)state a "need" for the lights because the students "need" the lights. High school sports is ,for many, a special part of the school experience, and it is an extra curricular activity. Students want (not need) to participate. There are requirements to participation which both students and parents must understand and agree to. These are not always convenient, as in waking up early (which is an admirable and productive habit) to begin practice "at the crack of dawn" and driving in to SF from surrounding Bay Area cities, where many of these athletes live, on a Saturday or Sunday.I speak from experience. SI wishes to "reduce the need to utilize off-campus fields and to make the use more manageable and better for our students". This statement indicates that there are off-campus fields available for their use. When a school decides to expand its sports program, it needs to take into account the manageability of the expansion with the existing facilities and neighborhood in mind. Making it "better" for the students at the expense of the residents is not acceptable.
To say that the proposal is not a change but merely shifts the time and/or days of the existing activities is avoiding the point that the later times are indeed a change that will encroach on the evening lives of the residents. There will be more activity on nights when there previously was quiet. Spreading out disruption over two days (Fri and Sat) instead of all on one day(Sat) is not an improvement by any means.Replacing several nights per year of " the noisy use of generator-powered temporary construction light"is more tolerable and preferable to 154 nights of lights no matter the spill and glare shielding they claim.The lights will be visible and the noise audible from afar.
Their attempt to dismiss traffic and congestion concerns by stating that only students already in attendance at the school will be participating ignores the families and friends of the not only SI teams but those of the opposing teams and the "SI affiliated groups" that utilize the field.
I am also concerned with their vague wording when asked the number of nights and time of light shut off for the various activities in both the letter to neighbors and the summary of discussion .At an initial community meeting, I heard over and over from proponents of the project including the president of SI, "It will only be 10 games a year". There was no mention of the night practices or low attendance games for which we still have no set number.The summary of discussion document contains phrases such as "large attendance/noisy events will not occur very often" and" large attendance games will be the exception , not the rule".They write "we do not envision greater than 4 or 5 large attendance night games" in the summary and in the letter to neighbors state "the 2020-2021 school year would have 6

high attendance night games on the lower field-3 football games,2 soccer games and a lacrosse game" . In replies to questions 11 and 21 the response includes the lines "SI is requesting usage until 10pm so as not to restrict future unplanned and/or changed use of the field due to schedule and league changes" and "We are requesting to have the lights on until 10pm on weeknights and 8 pm on weekends as we are unsure of future needs. At this time, in the short term, we foresee the lights being use primarily for low attendance practices." I see here elusive wording that allows for much expansion in the future. I stress that 10pm is very late for such lighting on a weeknight . All the fields with "similar lights" referred to in response to question 21 of the summary of discussion are public fields. Imagine stadium lights outside your house until 10 pm during the week ,especially if you have children or rise early for work, as many of us do.
Sincerely,
Seiko Grant

Dear Members of the SF Planning Department and Commissioners,

I just can't see this adding up. Saint Ignatius want's 90 foot light poles to facilitate student athletics? Is this for the direct benefit of SI's students, or just student athletes?

According to SI's recent postcard, they would "only" use the lighting 200 nights?

200 nights/year = 40 weeks = 5/7 illuminated nights/week for the standard school year:

California requires in class instruction at a minimum of :
180 days/year for grades 4-8 at 900 hours/year, and
180 days/year for grades 9-12 at 1,080 hours/year

900 hrs. / 6 instructional hours/day = 150 days/yr. = 30 weeks/year. Illumination happens during illuminated nights even when school isn't in session (grades 6-8)

Looking at grades 9-12:

1080 hrs. / 6 instructional hours/day = 180 days/yr. = 36 weeks/year. Illumination is at least happening 20 illuminated nights absent school in session.

The fact that SI apparently <u>knows already future scheduled illumination dates</u> makes it very difficult for them to revoke promises and contracts they've already signed with other schools, organizations, etc.

1. Doesn't this put extra influence, pressure on the Commissioners and SF Planning Department and others who make the decision on the "proposed lighting question" **<u>to rubber stamp if not reward Si's proactive but controversial move</u>** (regarding schedule, promises and contracts) with little if any really time for public comment or a fair airing of contrary viewpoints?

Has SI entered into contracts without full disclosure of the permissions/permitting process they've yet to complete in order to fulfill any contract? What does this demonstrate to their students? We can break the law and get away with it if you don't get caught?!!

Where is the Democracy, what are the values SI is demonstrating to its students?
When SI needs its students' cars to NOT be towed when their students park and obstruct neighborhood residents' driveways, liter the neighborhood, throw eggs on houses in retaliation and other malicious acts, SI wants the neighbors to "be kind".
But when the neighbors want a courtesy extend to them it appears SI plays lip service but acts only in SI's interest and refuses to consider compromise. Can't the Verizon tower(s) be atop the north SI buildings and the light poles be a maximum of 45 feet high and maybe operational 2-3 nights/week if at all? Fact is the height of the light towers are for the cellular provider and have <u>nothing</u> to do with the lighting needs of SI. That is, of course, if the needs of SI are based foremost on what's in the best interest of the SI students.

Even if the lights are on 4 hours/day x 200 days = 800 hours/year according to the postcard SI is suggesting students (athletic) spend potentially 10-11+ hours/day at school ( 6-7 hours of instruction + 4 hrs. in practice/playing sports).
SI argues their students (athletic and non-athletic) need more sleep so they will start the school day later and thus the school day goes longer into the evening for practice / game times.

2. What's the average commute time for an SI student? Minimum 1 hour each way if they don't live in SF?

Thus: 7 hours instruction w/ 30 min. lunch and 5 min. between classes
9 hours sleep (if the student actually is using their spare time to sleep)
2 hours commute time to SI for academic instruction, (but not practice or game time)
Total = 18 hours leaving only

In general, a non-athlete has just 6 hours/day M-F for potentially:
2 hours for family time (meals, breakfast/supper and how many eat in transit?) and 4 hours to study with no time to have a mental or physical break (no time to text, watch TV, play video games? no way!)*.

Add 2-4 hours for the student athlete's time for practice (daily, 2 hours, 4 hours on game days)
Total jumps to 20-22 hours (6/7 days per week considering games played on Saturdays).

The student athlete <u>might have time to eat</u>, but productive, studying time or time for homework? The choice becomes grades or sleep, grades will win and the student athlete is still "sleep deprived".

* How does this education schedule/system honestly and in practice meet the SI stated objective and goals, "educates all aspects of our students according to the Jesuit philosophy of *Cura Personalis*, care for the whole person" (courtesy of the SI website https://www.siprep.org

What is the SI administration's and SI Athletic Department's priority for an SI student?

3. Education or Participating in Athletics to ensure <u>income</u> for SI?

Isn't SI doing the same thing the PAC10, Big 10 and other conferences and leagues at the collegiate level do? That is, they are relying on sporting events, generate alumni bragging rights which in turn generate the majority of operating revenues via donations and attending sporting events with <u>*the student athlete being exploited for the betterment (financially) of the institution*</u>?

AND, are sporting events taking precedence to lifelong skills? Is SI choosing sports rather than an opportunity to provide better education to all, glorify brain power, develop honor in intelligence vs. disparaging "geeks", and developing each person for success. Honestly, do the student athletes of SI become a pawn in the exploitation of the athlete who may often be a minority and/or a person of color? Of the ~20 sports SI offers, <u>less than 20% of the sports will actually will utilize the lighting</u>.

Ask why colleges are now allowing athletes to earn money (beyond scholarships) for endorsements from major sporting goods manufacturers? And when will SI follow suit?

4. What is SI really doing? Educating future leaders or exploiting athletic talent for financial gain because less than 1-2% of high school athletes will actually play college sports (DIV I)

http://www.ncaa.org/about/resources/research/estimated-probability-competing-college-athletics

AND
less than 4% of college athletes have a successful professional sports career according to the NCAA (many HS sports have no professional sport equivalent):

http://www.ncaa.org/about/resources/research/estimated-probability-competing-professional-athletics

Does the country need to develop leaders with ethics, honesty, integrity, intelligence, empathy and wisdom or "Gladiators" exploited for sport, entertainment (commercial revenues, TV rights, gambling) and profit/financial gain? Isn't a gladiator really just an athletic slave?

5. What are the values SI, the SF Planning Department and Commission wish to teach SI students vs. what values are they actually demonstrating?

Who's accountable to the ill-equipped former athlete who one day will perhaps be crippled, bankrupt, addicted or potentially imprisoned (O.J.) for failing to emphasize personal value, worth, honesty, integrity and intellect as the foundations for success.

https://steelvalleybankruptcy.wordpress.com/2018/01/05/how-athletes-go-bankrupt-at-an-alarming-rate/
https://www.huffpost.com/entry/pro-athletes-big-winners-_b_5504073

As leaders, elected and appointed officials I, a citizen of SF and a neighbor of SI, look to both myself and to each one of you to consider how our actions, decisions and comments reflect the values, model integrity and demonstrate responsible citizenship to the educators, administration and most importantly to the young and influential minds of the SI student body.

With Kind Regards,

Shirley Recipon
srecipon@comcast.net

—
P.S. Sister to a former Big 10 (Michigan State, class of '84) athlete (women's basketball) who graduated with a major in Mathematics (took five years) and is a healthy, productive and successful citizen. She's the rare exception who also had a 4.0 GPA in high school.

## Horn, Jeffrey (CPC)

**From:** sisunset neighbors <sisunsetneighbors@hotmail.com>
**Sent:** Tuesday, June 09, 2020 2:26 PM
**To:** Horn, Jeffrey (CPC)
**Subject:** For Accela pls: S. Recipon Letter June 8

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***From:*** *Shirley A. Recipon <srecipon@comcast.net>*
**Sent:** Monday, June 8, 2020 11:37 AM
**To:** jeffrey.horn@sfgov.org <jeffrey.horn@sfgov.org>; corey.teague@sfgov.org <corey.teague@sfgov.org>; rich.hillis@sfgov.org <rich.hillis@sfgov.org>; delvin.washington@sfgov.org <delvin.washington@sfgov.org>
**Cc:** joel.koppel@sfgov.org <joel.koppel@sfgov.org>; kathrin.moore@sfgov.org <kathrin.moore@sfgov.org>; sue.diamond@sfgov.org <sue.diamond@sfgov.org>; frank.fung@sfgov.org <frank.fung@sfgov.org>; theresa.imperial@sfgov.org <theresa.imperial@sfgov.org>; milicent.johnson@sfgov.org<milicent.johnson@sfgov.org>
**Subject:** The Numbers Don't Add Up! RE: SI's 90 Foot Athletic Lighting Needs vs. Students' Development

Dear Members of the SF Planning Department and Commissioners,

I'm a neighbor of the Saint Ignatius Preparatory Academy (SI).

I'm also keenly aware of the plans SI is requesting approval of in order to significantly impact the evening lighting, traffic and noise surrounding
the SI athletic fields and adjoining neighborhood residences.

Please find attached for your immediate consideration my heartfelt concern for the neighborhood, the SI students, SI student athletes and the future of each student after high school.
High school is no longer a means to an end but preparation for success in life to open up doors and opportunities in higher education, and citizenship through participation in our Democracy as leaders, advocates and voters.

I appreciate your serious consideration of the points raised and request denial of SI's building permit and petition(s) relating to installation of the Verizon rely system atop 90 feet tall lighting towers.

With Kind Regards,
Shirley

—
**Shirley A. Recipon** | m 1(415)781-9507 | t 1(415)661-1743

## Horn, Jeffrey (CPC)

**From:** Shirley Yee <shirlcyee@gmail.com>
**Sent:** Tuesday, May 05, 2020 8:11 AM
**To:** Horn, Jeffrey (CPC); Teague, Corey (CPC); Hillis, Rich (CPC); Washington, Delvin (CPC)
**Subject:** Stop St. Ignatius Stadium Lights

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear San Francisco Planning Department,

My name is Shirley Yee and I live with my husband and two kids in the Sunset District at 2155 39th Avenue. Our house is directly across the street from St. Ignatius High School's (SI) football field.

SI's proposal to install four (4) 90-ft. permanent stadium lights in their football field will directly and negatively impact our quality of life. Not only will their illumination shine into our homes (our bedroom fronts 39th Avenue), but the noise from the night games will be intrusive. Our two elementary school-aged children have early bedtimes, well before most of the night activities planned for the stadium lights will end.

Such lights have no place in a residential neighborhood. They will rise more than three times the height of standard street lights and almost five times the height of most of the single-family homes in the area. Besides the noise and light pollution issues, the lights themselves will be an eyesore.

On April 29, 2020, SI held a virtual meeting required by the Planning Department. Although the meeting was set for an hour, Tom Murphy from SI, ended the meeting 20 minutes early without addressing any of the questions posted in the chat or unmuting any of the residents in attendance. It was a one-sided meeting where SI was able to do their presentation without having to answer to any of the neighbors. **SI should be required to hold another neighborhood meeting when the shelter-in-place order is lifted.**

As the Verizon representative said during the virtual meeting, there is no reason the Verizon antenna needs to be installed on the proposed 90-ft. stadium lights. Verizon's equipment installation project should be kept separate from the stadium lights installation.

It's obvious the stadium lights are important to SI to attract students. Any benefits accrue to SI only, not the neighborhood. In fact, the noise and traffic generated by the events held at the school will be disruptive to the lives of our community. SI should have never received a Categorical Exemption in their CEQA determination as the use of the football field at the school will change with the addition of the stadium lights.

**I ask for your help in stopping SI from installing the proposed stadium lights** and would be happy to discuss our concerns with you. Thank you for your consideration.

Sincerely,

Shirley Yee

From:Seiko Grant

2931 Rivera St.

San Francisco, CA 94116

05/01/20

To: SF Planning Dept.

1650 Mission St

San Francisco, CA 94103

Re: Night Lighting at Saint Ignatius College Preparatory

Dear Commissioners,

My name is Seiko Grant and I have lived in the Sunset District for 56 years, 53 of those in my current home at 2931 Rivera St. During this time I watched Saint Ignatius College Preparatory (SI) high school being built and transition from an all-boys to a co-ed school. The residents adjusted to the increasing traffic,parking issues and weekend noise from events at the J.B Murphy field. We could always depend on a return to quiet streets in the evening after a full day of work and to get to sleep in preparation for the next day. This is a basic condition that everyone, including all of you on this commission,needs for a healthy existence.This is why we chose to invest our money and spend our lives here. Our homes provide a space to rest and gather comfort. Our neighborhood is a source of support and safety.We feel very fortunate.

Saint Ignatius College Preparatory school (SI) is planning to install permanent night time stadium lighting on J.B Murphy field using LED lighting on poles rising 90' high. They anticipate use of the lights for over 150 nights a year and until 10:00 pm in most cases.The administration at SI have not been forthcoming about the specifics of this proposal. Details have been changing in every announcement ( initially they stated only 10 night events a year) and emerging sporadically. Though legally required meetings have been held and advisory notices distributed, feedback from residents affected by this plan is not given much weight as this project is considered by SI as destined to be completed according to their wishes. In enlisting a telecommunications provider, Verizon Wireless,to install a series of antennas to one of the proposed 90' light poles, the project may be considered an essential service and thus fast-tracked even during the shelter-in-place order. One of graphics, presented by the Verizon representative to demonstrate how the proposed installation would remedy a lack of coverage to access wireless services, revealed that only the baseball fields at West Sunset recreation area and part of Sunset Blvd had less coverage. The Ortega library and neighboring homes have very good wireless connections and nothing additional is needed in the open fields.

Light pollution,noise pollution and increased traffic to the extent that they would significantly effect living conditions for a large number of residents and avian life in the area surrounding the J.B.Murphy field are of great concern. A thorough investigation into these effects including a full environmental review in accordance with the California Environmental Quality Act must be conducted. I strongly object to the exemption from environmental review. On the one hand, in the conditional use application, SI states that " Traffic will not be increased, as persons already attending the school will use the field." In the project application, they state that " The lights bring people to the neighborhood.." and " the field is used by a variety of non-profit institutions…". These conflicting statements must be resolved. A greater number of night events will definitely increase traffic.

One reasoning for SI wanting to go forward with this project as stated by their representative,

Mr. Tom Murphy, in the online meeting of 4/30/20 is to allow a later start time of the school day quoting studies showing later sleep cycles for teenagers. Again in the project application ,"..providing greater opportunities for students to have adequate sleep." Mr. Murphy also mentioned that night games during the week will allow those families to have weekends free and reduce traffic on Saturday. Would that they have as much concern for the weekends and sleep time of the neighborhood residents to whom they say they want to be good neighbors. The enhanced educational experience desired by SI would be better served by teaching the students time management and that participation in extra curricular activities require adjustments which may not always be convenient.

There is no other school in San Francisco, public or private, which has lighted fields on their campus. All those schools continue to provide excellent educational experiences without negatively disrupting the lives of the neighborhood. There was no discussion or questions allowed at this meeting that were not "related to the project". I consider the concerns of the residents living around the field directly related to the project.

Any other parks in San Francisco with night lighting are open for use by the general public.

The "expanded use of existing open space" at J.B. Murphy field is restricted to the students/families of SI. The cost, including reduced property values, will be borne by the entire neighborhood. I object to the proposed night lighting on the fields at Saint Ignatius College Preparatory and request that this commission decline to approve this project.

Sincerely,

Seiko Grant

Dear Planning Commissioners,

This is a letter on behalf of the Sunset Community Garden, which is located directly north of S.I.'s campus, on 37th Avenue at Pacheco. We are opposed to this project and we ask you to not allow the installation of the nighttime stadium light and cell antennas in this residential neighborhood. Our garden is a natural oasis in our concrete jungle known as San Francisco and we are so lucky that we have it available for our use. We want to keep this area as pristine as it is. It truly is a clean, fresh air oasis surrounded by wonderful trees and nature, and is teeming with birds, bats, butterflies and honeybees. Please don't let the lights negatively impact the natural environment in this area. Think about how your action will be effecting environmental justice. Climate change is upon us all and this quiet community by the sea does not need any more carbon depleting pollution from the lights and car exhausts from the outside area. The ball field has operated without these glaring lights for many years and the games went on.

We are one of the oldest Community Gardens in San Francisco, which started during the Victory Garden era of World War II. We have 54 plots (over a hundred members or more), are free of charge, and are comprised of a very diverse community of gardeners (a large Asian population with many countries from all over the world represented), over 50% of which are retirees on fixed low incomes and don't speak English. Our oldest gardener Lilly Wong is in her 90s and we have families with young children in the Garden as well.

We are a direct next-door-neighbor of S.I., however S.I. never contacted us to inform us about the stadium light project or to ask us about our concerns. We only recently learned about it, through one of our members. At a recent Zoom meeting, our Garden members were very *unhappy* (enraged, disappointed, upset!) about the proposed project and felt disregarded by S.I. The lights at night will disturb the natural balance in the vicinity of the garden and will bring more parking congestion and trash near the gate of the Garden on 37th Ave. We know that crowds attracted to nighttime games (including opposing team's fans) will bring more vandals hopping the fence into the garden and damaging plots and overturning garden furniture, etc., which we have already experienced too much of.

Please consider our needs as an important part of the Community and do not allow these lights and cell antennas. They are detrimental to our Garden and offer no benefit to the Garden Community. Please do not threaten this safe and beautiful place, particularly for the sake of our senior members.

Sincerely,
Lance Mellon Coordinator

Sunset Community Garden

## Horn, Jeffrey (CPC)

**From:** Teo Manzo <teo.a.manzo@gmail.com>
**Sent:** Monday, June 08, 2020 2:16 PM
**To:** Horn, Jeffrey (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Diamond, Susan (CPC); Fung, Frank (CPC); Imperial, Theresa (CPC); Johnson, Milicent (CPC); Mar, Gordon (BOS); Marstaff (BOS); CPC-Commissions Secretary
**Subject:** SI Lights

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear San Francisco Planning Department,

My name is Teo Manzo I am a sophomore at George Washinton high school. I live right down the block from Saint Ignatius. Almost every day (Pre Covid-19) I come home to seeing SI athletes using a hill of Quintara street between 39th and 40th Ave as a hill to run-up as an exercise. They will continually run-up all while the coaches are screaming and yelling. To me, this isn't a huge problem while loud and sometimes annoying this is the least of my concerns. After that, the soccer practices would start and go on until around 6 or 7. Then it finally becomes peaceful, however, if SI were to build these lights that all changes. SI football games are already loud from the announcers and cheering. If this were to happen at night it would be exponentially more annoying. Combined with the aspects of partying at night, teens drinking, smoking (I've seen this happen before at SI and at my own school's football games so I know for a fact that this would happen here) and garbage. That would make things even worse with this happening 3 times a week. So please do take this letter into consideration when you make the verdict and understand the burden you would be putting on us neighbors of SI before approving this project.

Thank you for reading

-Teo Manzo

## Horn, Jeffrey (CPC)

**From:** Tiffany Pavon <tiffanypavon@gmail.com>
**Sent:** Tuesday, June 09, 2020 7:46 PM
**To:** Horn, Jeffrey (CPC); Teague, Corey (CPC); Hillis, Rich (CPC); Washington, Delvin (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Diamond, Susan (CPC); Fung, Frank (CPC); Imperial, Theresa (CPC); Johnson, Milicent (CPC)
**Cc:** sisunsetneighbors@hotmail.com
**Subject:** Letter Regarding SI

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

We are the Pavon Family and live in the Sunset District at 2175 39th Ave.

Saint Ignatius (S.I.) is planning to install permanent nighttime stadium lighting on their football field. These LED lights will rise 90 feet above the field which is located in our own residential neighborhood.

SI is proposing these stadium lights to be in use for over 200 nights a year and up until 10 pm. This is a residential neighborhood.

As I live directly across the street from the field with my family that includes a 12-year-old. This will disrupt our life beyond what is acceptable. Most of these homes have bedrooms in the front directly facing the field and with lights, games, noise, traffic etc our right to quiet enjoinment is at stake.

Having more events and lights and noise that go until 10pm weekdays is just not feasible. On a regular game day, we already have issues with traffic, double parking, blocked driveways, noise and safety. Leaving our home on game days is extremely difficult with our driveway constantly being blocked and double-parked cars making it difficult or even impossible to leave our own home. Add to this nighttime games with loitering and people gathering after games this will create a noise and safety problem in our neighborhood.

We as neighbors have reported our issues to SI just to get brushed aside. We are a residential neighborhood and there is Absolutely no reason that the city should allow this to proceed.

SI is a private school that this will only benefit them and and not the neighborhood or city, this will use our city resources more- police, garbage, MTA etc, stretching it thin and taking away from our neighborhood safety.

39th Ave and Rivera are bus lines and during games busses have to go around double parked cars creating dangerous conditions for drivers, riders, pedestrians and neighbors.

++++The project has been renamed as a Verizon wireless project when it is actually a project to install 4 Permanent Stadium Lights with massive impact on our neighborhood

The meeting was shut down by SI -20 minutes early without any of the neighbors ever taken off mute and without any discussion.

It appears that SI is taking advantage of the current virus and the need for remote meetings to mute their neighbor’s ability to ask questions and voice concerns.
They couldn't MUTE us in an actual in-person neighborhood meeting during normal times.

The Pavon Family

**rom:** Timothy Brey <tbreyehs@gmail.com>
**Date:** May 6, 2020 at 10:59:21 AM PDT
**To:** joel.koppel@sfgov.org
**Cc:** marstaff@sfgov.org
**Subject: Record No. 2018-012648CUA: 2001 37th Avenue / Koppel**

# Record No. 2018-012648CUA: 2001 37th Avenue / Koppel

Hello Commissioner Koppel,

**I am writing to express my disapproval for the Ignatian Corporation's request to install 90 foot lighting fixtures on the JB Murphy field.**

**The request for Cellular Service Antenna (so deemed essential) should be a separate application from change of use with lighting.**

According to Dun & Bradstreet, "The Ignatian Corporation is part of the Private Schools K-12 Industry, generates 39.31 millions in sales (USD)."

Saint Ignatius is a private entity with a school tuition of $26,000, is not a public institution and does not provide any public services to the local Sunset community.

**The Ignatian Corporation's Master Plan stated rationale of the need for lights is a joke. They claim the need for lighting due to the hardship in having 66 teams competing for use of the "facility" which again is not the Sunset neighborhood's problem and is also disingenuous since out of the 15 sports, 10 do not use the JB Murphy field (basketball, volleyball, golf, cross country, tennis, waterpolo, rowing, softball, swim & diving, baseball). Again, a private entity that wants to offer it's exclusive clientele a "sports night club" at the expense of the community.**

The claim that "it will have no impact on traffic and parking" is simply not true. Increased time/use of the field logically means more impact on traffic and parking.
They profess how their lights will be newer technology etc. than what was installed at the South Sunset and Beach Chalet fields. This is a misdirection, since they neglect to state that both South Sunset and Beach Chalet are public fields, both of which I have had the pleasure to practice evening soccer with my daughter over the past years. We San Franciscans derive no such benefit from SI's light installation, only a socialization of costs for private benefit.

I note that the City's Planning Code Section 101.1(b) establishes eight priority-planning policies and requires projects to comply with said policies.
Two of the policies clearly are not being adhered to if the commission allows the installation of 90 foot light towers and use of the field until 10 pm.

(2) **That existing housing and neighborhood character be conserved and protected in order to preserve the cultural** and economic diversity of our neighborhoods;

Residents have come to terms with the regular day-time use of the competitive sports programs of Saint Ignatius, including the noise from crowds and the PA system. Day use includes early morning practices with coaches blowing whistles and teams chanting. I have no reasonable objection to this. This neighborhood is zoned single family residential, but this radical change in use (lighting until 10 pm) will burden all neighbors with increases in parking, traffic, noise and light pollution. Lighting on the field and the use of the field until 10 pm will change the character of this neighborhood forever, in a negative way.

**(8) That our parks and open space and their access to sunlight and vistas** be protected from development.

I have come to refer to our neighborhood as the "Big Block," composed of Saint Ignatius, West Sunset Fields, Sunset Elementary, Ortega Park and Library, and AP Giannini. It is truly unique in that all the power lines, phone and cable lines are buried, leaving a spacious and clean appearance. The vistas looking out from various points in the neighborhood towards the Pacific and up towards Mt. Tamalpais are marvelous. Having 90 foot light poles will degrade these views. Point 8 mentions "sunlight," a shame it doesn't also include "night sky" as the light pollution would only degrade the areas night sky.

Commercial Enterprise - Saint Ignatius has historically and regularly rented 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, to name but a few. These are commercial operations that the further impact the neighborhood. With new lighting, the Ignatian Corporation will likely continue to rent out the field to private groups, allowing themselves to gain more at the public expense.

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.

**If the JB Murphy field were a public park/field, the lights would benefit all people, not just a select few.**

No other high schools (public or private) in SF have lighting and there's no reason to start such a trend. There are other fields available for special events or final matches that could be used. Or, Saint Ignatius should continue to utilize rental lights for limited events or special games.

I would hope the SF Planning will act in the interest of the neighbors and public by denying the Ignatian Corporation's (Saint Ignatius College Preperatory High School) request for lighting.

It is really a shame to hold this virtual hearing when many residents do not have the technological savvy to participate, that's not democracy. This is yet another reason to separate the cellular antennas from the lighting installation/use application.

Finally, can you tell me what critical elements you will be considering when looking at this proposal and if you can separate out the need for cellular coverage from lighting for sports? Can you rule for the essential service from the non-essential (which burdens the neighborhood and public)?

Thank You,

Tim Brey
2831 Rivera Street
**San Francisco, CA 94116**

## Horn, Jeffrey (CPC)

**From:** Una Fitzsimons <unafitzsimons11@gmail.com>
**Sent:** Wednesday, May 06, 2020 1:21 PM
**To:** Horn, Jeffrey (CPC)
**Subject:** 2018-012648CUA Saint Ignatius field lights/cell tower

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

May 5, 2020

Re: 2018-012648CUA Saint Ignatius Field Lights and cell tower

Dear Jeffrey Horn,

I am writing to express my disapproval and anger at Saint Ignatius' rush to push through their lighting project under the guise of essential business due to the cell tower project connected with the lighting.

We are still dealing with shelter in place orders during an unprecedented pandemic! You and your colleagues aren't even in your offices. We can't physically congregate/meet with our neighbors to discuss this. Why is this happening now? This is not very democratic. Many neighbors are not technologically savvy and thus can not attend virtual meetings and will not get to have their voice heard.

Saint Ignatius had a "community" meeting on April 29 where they had a representative from the lighting company and a rep from Verizon talk at the 100 people present on the Zoom call, but never answered any of the questions or concerns presented by neighbors at the meeting or allowed any feedback. In fact, the community was on mute the whole time! It was a master class in spin, not in listening to or reviewing the community's concerns. They even ended the "meeting" 20 minutes early!! They revealed they aren't dealing in good faith with their neighbors; they just want their project fast-tracked. How are they able to behave this way and ignore the community (when they are part of this community and benefit from being in this community)? Their lighting project will most definitely adversely affect the neighborhood.

Saint Ignatius is a private entity which generated $39 million in sales/tuition last year; they also are exempted from 96% of their property taxes. Why can't they put the cell tower on their roof with the other one they have? Certainly they have the money and resources (as indicated by the scale of this project). SI claims their 90 foot lights and evening schedule of 150 nights/year until 10 pm won't have an impact on traffic, parking, and noise. This is not like Beach Chalet or South Sunset Fields because SI is private and the community derives no benefit from this project! It's not open to the public. All the benefit is theirs; all the costs in noise, light pollution, increased traffic (especially during games), and increased parking is ours. How is this being a good neighbor?

SI claims hardship in that they have 66 teams competing for the field space. Many of their sports programs do not even use the field (basketball, volleyball,golf, cross country, tennis, waterpolo, rowing, softball, swim and diving, and baseball). Why should the community (through the impact of traffic, light pollution, noise and parking) have to suffer because they need more time for their teams on the field? No other high school in the city has lights (for late night practices). Why does SI get an exemption? A few years ago SI admitted that at least 40% of their student body drive in from areas outside of San Francisco. That's a lot of extra cars here every day and (if this goes through) every night!

This project constitutes a change in use of their field. Where is the CEQA study/review of light pollution, parking, and traffic from this new night-time usage? My family and I live directly across the street from SI. We expect the daily

deluge of student parking and traffic, but extending usage with the lights until 10 pm will definitely have a negative impact on all of our neighbors' quality of life. SI is lying when they state that there will be "no impact on parking and traffic" with this new project. Anyone with a brain will tell you that of course there will be an impact on parking and traffic, especially on game nights/events throughout the year.

Saint Ignatius' lighting project violates compliance point 2 and point 8 of the City's Master Plan policies:

That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.

That our parks and open spaces and their access to sunlight and vistas be protected from development

The lighting of the field and night-time usage which will increase traffic, parking, noise, and light pollution will negatively impact and change the character of our neighborhood. The outer Sunset is mainly residential and quiet. This project does not comply with the character of our neighborhood. Our neighborhood (around the block of SI, West Sunset Fields, Ortega Park, and AP Giannini) has all the power lines and poles buried, leaving a unique and unobstructed view all the way across to the Marin Headlands! It's a rarity in the city and these proposed lights would definitely change that. We need to protect this unique character of our neighborhood.

Saint Ignatius currently rents out their field on the weekends and early evenings. SF Elite Academy soccer team, pee wee football, and adult league ultimate frisbee teams have used it on different occasions in the early evenings and weekends. SI says they do not "rent" it out, but perhaps they receive a donation instead. They are a private corporation and we have no access to their agreements. We have no way to hold them accountable!!! In essence, they operate a commercial enterprise as relates to their field and this will continue apace with lights. Our neighborhood is residential; we don't need a private night-time sports club operating until 10 pm every night! That will change the character of our neighborhood.

SI is private and benefits a small cadre of students who attend, many of whom do not even live in the city. We have no way to hold them accountable regarding the night-time use of their field. We have no way to hold them accountable for anything. We need you to hold them accountable and say no to this project! It is NOT in the public interest. This project is only in the (private) interests of SI and the resulting increase in traffic, noise, light pollution, and parking must be borne by the neighborhood.

So, I ask you, what exactly is the public benefit of 90 foot field lights on until 10pm 150 nights a year? Again, how is this project in keeping with the character of the neighborhood? How is SI being a good neighbor here?

This seems like a very good example of what is known as privatizing the benefits and socializing the costs. The upside is all SI's. There is no public good here. This project must not go forward. It is not in the public interest. Thank you.

SIncerely,

Una Fitzsimons
2831 Rivera St.
SF, CA 94116

My name is Vicki Tomola and I live in the Sunset District at 2135 39th Ave,

Background

Saint Ignatius (S.I.) is planning to install permanent night time stadium lighting on their football field. These LED lights will rise 90 feet above the field which is located in our own residential neighborhood.

SI is proposing these stadium lights to be in use for over 150 nights a year and until 10 pm for most events.

Despite the current COVID-19 crises, Saint Ignatius has been able to move this project forward over the next few weeks because one of their stadium light towers will hold Verizon wireless antennas and during this crisis. Despite the fact that SI already has existing cell installations on their campus buildings.

During our current stay at home orders, SI is trying to sneak their giant stadium lighting project through the planning process quickly and with as little attention from neighbors and our city officials

SI is not acting in good faith or as good neighbors - trying to slip this through when no one is paying attention.

The project has been renamed as a Verizon only wireless project when it is actually a project to install 4 Permanent Stadium Lights on the SI football field with a disruptivese impact on our neighborhood

If states can delay elections, if major events are cancelled, when people are dying, and we're all distracted - why is SI allowed to push this project through when it will have such huge effect on the neighborhood and neighbors.

SI is currently closed, has no sports activities for the foreseeable future - why the rush to install these stadium lights now?

Some of our neighbors are first responders and don't have time to pay attention to stadium lighting.

This project has no pubic value - it is for private SI usage only yet it will have a direct affect on the public - our neighborhood

It's not just about the equipment (lights & cell tower) It's about how the night activities will affect and disrupt our neighborhood evenings. Your attempt to disrupt our neighborhood without our voices heard continues to show your total disrespect for us. You have continued to take advantage, for 30+ years now, by not supplying any parking on your property for the overwhelming number of student drivers you have.

Many of us bought our homes with full awareness of SI having weekday/weekend activities during the DAY TIME- but to extend that into the evenings is new and unacceptable.

<u>The Meeting - Frustration</u>

Saint Ignatius and Verizon had their SF Planning required meeting yesterday remotely by Zoom and phone in

They MUTED everyone but themselves and proceeded to present the project - lights and Verizon antenna.

Only a few of our questions to SI were answered and the rest ignored.

Tom Murphy from SI refused to answer the majority of our questions because they are "not applicable to the project"

The meeting was shut down by SI -- 20 minutes early without any of the neighbors ever taken off mute and without any discussion.

SI/Verizon should not be allowed to MUTE their neighbors in a meeting required by SF Planning

It appears that SI is taking advantage of the current virus and the need for remote meetings to mute their neighbors ability to ask questions and voice concerns.

They couldn't MUTE us in an actual in-person neighborhood meeting during normal times.

SI claims to be a good neighbor -- this meeting was not conducted by a good neighbor.

I am so outraged at this SI institution and how they think they can do whatever they please with no consideration for the residents of this neighborhood, this behavior by this institution has been like this for 30+ years now. We have had enough!!

This institution has yet to supply a parking lot/ structure to accommodate the overwhelming number of student drivers, most likely not even SF residents. The parking was never an issue when this school first opened.

Now you want to disrupt our neighborhood even more with night lighting shinning into our bedrooms and living rooms, noise and continued parking issues long past the end of the school day for almost half the year. This is NOT ACCEPTABLE!!!

Now this institution wants to place the residents and their children at risk to the possible exposure to electromagnetic waves from cell tower/antenna equipment. Our health, our children's health, young children playing sport nearby could be at risk. For who's benefit? For pure greed by two institutions, selfish SI and corporate Verizon, not at all about what is best for the community.

The City is supposed to be a democratic community, one that will listen and take to heart what the people want, what the people in this neighborhood want, what they and their children deserve to live in this community.

Longtime Resident,
Vicki Tomola

## Horn, Jeffrey (CPC)

**From:** 夏莲徐 <xuxialian@gmail.com>
**Sent:** Monday, June 08, 2020 10:25 PM
**To:** Horn, Jeffrey (CPC)
**Subject:** Oppose to Saint Ignatius stadium light project

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Jeff,

My name is Xialian Xu, and I live in the Sunset District at 2123, 40th Ave, San Francisco.

Saint Ignatius (S.I.) is planning to install permanent night time stadium lighting on their football field. These LED lights will rise 90 feet above the field which is located in our own residential neighborhood.

One of the light poles will hold a 5G Verizon wireless antenna

SI is proposing these stadium lights to be in use for 200 nights a year and until 10 pm for many events.

It's not just about the equipment (lights & cell tower) It's about how the night activities will affect and disrupt our neighborhood evenings. Noise, traffic, difficulty to find a parking space in the neighborhood. This is a residential area but not a commercial area. We need to rest after a day's work and our kids need to go to sleep on time!

The majority of their proposed light use is for practices however SI already has a practice field with lights on 37th Ave

Saint Ignatius has been able to move this project ahead because one of their stadium light towers will hold a 5G Verizon wireless antenna which is considered an essential project during this crisis. SI already has cell installations on their campus buildings.

The SI stadium light project has been renamed as a Verizon wireless project when it is actually a project to install 4 Permanent Stadium Lights which will have a negative impact on our neighborhood evenings

This project has no pubic value - it is for private SI usage only -- yet it will have a direct affect on the public - our neighborhood

Many of us bought our homes with full awareness of SI having weekday/weekend activities during the day time - but to extend that into the evenings is new and unacceptable.

Please consider our voices-------- We oppose to Saint Ignatius stadium light project!

Thank you very much!

Sincerely,

Xialian Xu

# ATTACHMENT 4

# NEIGHBOR OPPOSITION LETTERS TO DISTRICT 4 SUPERVISOR 2015

**August 24, 2015**

**RE: <u>SI'S PLANNED PERMANENT LIGHTS ERECTION/INSTALLATION ON ITS ATHLETIC FIELD AT 39TH AVENUE AND RIVERA STREET</u>**

**TO WHOM THIS MAY CONCERN:**

This letter is to register our strong opposition to the proposed erection by St. Ignatius Preparatory of a permanent lighting system on its athletic field at 39th Avenue and Rivera Street in San Francisco, CA 94116.

We honestly believe that its installation and operation would eventually cause harm to, and endanger the safety of, the nearby residents in this area with the noise, litter, parking problems, tremendous traffic and possible radiation exposures it could generate.

Hence, our strong and vehement opposition to this plan.

Thank you.

Vic Aguirre
Affected Area Resident
2183 39th Avenue
San Francisco, CA 94116

2179 40th Avenue
San Francisco, CA 94116
8/24/15

District 4 Supervisor Katy Tang
Saint Ignatius Principal, Patrick Ruff

Dear Supervisor Tang and Mr. Ruff:

As a 30-year resident of this neighborhood, I am writing to express my concerns about the plans that SI has for installing lighting for their ball fields and for the proposed construction and installation of taller cell towers.

I am strongly opposed to SI holding night games on their fields. Currently during the school day, there is a great deal of noise and traffic. It is difficult for the residents and our guests to find parking on our streets. I have asked students not to park in my driveway and have been told that they were late for school and that they weren't going to move their cars. There have been multiple accidents in the intersection by my house, caused by students or parents. I understand that many of your students commute from outside the city and that public transportation my not be the most efficient commute option. But during game time it is always much worse. Your students, their friends and families are often double and triple parked. Due to the parking issues, the 48 Quintara bus has had to be rerouted off 39th Avenue during games. Our driveways are blocked. This is bad enough during the day games. But to expect us to put up with this at night is unreasonable. It is a real problem for our quiet and safe neighborhood.

There are other issues that also arise during your games. The loudspeakers are very intrusive. It is easy to hear all announcements, even with my windows closed. It interferes with sleeping and with the quiet enjoyment of our homes. We do not broadcast during school hours while your students are in class. I would expect the same from any other good neighbor.

I am also very concerned about the proposed construction and installation of cell towers. I don't see these plans as doing anything to address the current problems in our neighborhood and will just exacerbate these issues.

We have families with small children who need to sleep, adults that need to go to work the next morning and seniors who shouldn't have to tolerate this disruption. We expect to be able to enjoy our evenings without the intrusion of lights, loudspeakers, traffic and we expect to be safe when we to drive on our streets.

Thank you for your consideration.

Dr. Anne Marie Benfatto

To: HONORABLE PATRICK RUFF. I AM IN A WHEELCHAIR

I would like to speak to the issue that the pedestrian around SI CP are NOT SAFE AND at times it is more dangerous than other times. Parents buy these RETRO MUSCLE CARS for their sons (sometimes daughters) — which are driven at an unsafe speed - they ignore the rights of pedistrians & break traffic code laws - they also park in residents driveways (greater than 18") - parking sticker indicates they are SI students. Please SIR RUFF - We are just working people here in the sunset district - We are not strong enough to fight these RICH people who have been slowly encroaching into our living areas. PLEASE HELP US

SINCERELY

JAMES R. Clark USMC Ret.
2194 40th AVE.
S.F. 94116

Hi! I am not able to attend the Tuesday evening meeting, but I really would not like to see night field lights on at Saint Ignatius. I live right across the street and my 2 bedrooms face the field. Actually I would like more info on how long the lights would be on and how often. Parking is already an issue when there are games - Thanks,

Linda C. Delucchi

LINDA C. DELUCCHI, 2131-39th Ave, 415 247-8084

A. M. D. G.

To whom it may Concern @
Saint Ignatius College Prep. High School

It has come to my attention that you will be installing lites and having nite games at the ball field.
Enough is enough. This High School has stepped on the toes of this neighborhood since 1970. Parking is ridiculus around here. The students regard for the neighbors is not the way it should be for a Catholic High School. The constant amount of people betwee S.I. and the West Sunset playground both in noise and parking has gotten out of hand and you want to make it go into the evening now. So it will be from 8am to 8pm if you get your way. How would you as a S.I. president like to live here.

I will stand in the way of this, and also push for neighborhood Parking permits for property owners in the neighborhood if this goes thru.

Yours, D.F. Dooling Class of 1969.
Ashamed of being a S.I. Alumni.
And am glad to be from the OLD School where they were easy on the neighbors on Stanyan St.

To: Supervisor Tang
St. Ignacious Principal Ruff

From: Carole Gilbert
2179 40th Ave.

I am writing this letter to you both in order to express my concern about your plan to install 90-foot lights on your playing field for the purpose of holding night games at your school.

I have lived in my home since 1984 and have experienced the growth of your school and how it has slowly encroached on our quiet family neighborhood.

Below are just some of the issues this neighborhood currently faces during daytime/weekend events:

1. Day time parking is taken up by your ever-increasing student population.
2. Your after school sports programs have continuously caused traffic issues. Students, parents and game attendees frequently double park.
3. Students stand in the middle of the street talking to friends in double-parked cars, which causes traffic problems and great safety issues.
4. During these times the 48 Quintara Muni bus is unable to make the turn onto 39 Avenue. They are forced to change their route and drive down 40th Avenue in order to continue serving the people of this neighborhood. This practice must stop because it is against Muni regulations to change their route.
5. People continuously block our driveways during these daytime games as well as during regular school hours.
6. There are no parking and traffic officers here to monitor these events.
7.Your loud speakers are extremely loud. I can hear every word as clear as if it were being said inside my house, which is 2 blocks away.

Once you start playing and practicing at night these issues will only multiply. We chose to live here because this is a neighborhood of quite single-family homes. We are families who work and have children. We

Hi Katy and Patrick,

I am representing the house of 2127 40th Ave and 2146 40th Ave. My family is living in 2146 and my father is living in 2127. My family and my father are **opposed** to build a permanent lights on the athletic field at Saint Ignatius School. The light will be too bright that would affect my family to fall asleep and it will create a lot of noise and parking problem. In addition, it will bring more stranger to my neighborhood at the night time which is not acceptable. I wish you will understand our concern and do not build a permanent lights in the athletic field.

Any further concern, please contact me at Coral_ho@hotmail.com.

Coral Ho

25 August 2015

August 25, 2015

Re: Proposed lights at Saint Ignatius Athletic Field

To whom it may concern:

We have lived on 40th Ave, one block away from college prep school Saint Ignatius for our whole lives. For many school years, we have tolerated the loud students driving fast around our block, blocking our driveways because they were desperate to find parking, and stopping for unexpected students running across the street when school is out or in session.

We strongly oppose the addition of field lights for night games because we fear our neighborhood will get flooded with cars and littered after football games. We like to come home to easily find parking. We don't want our houses lit up from the bright lights of the games when we try to wind down from our busy days.

It may not be apparent to any SI faculty member or it might be, but these students are very careless and unapologetic to the way they are in our neighborhood. On several occasions, we've seen kids nearly hanging out of a car because their friends were driving them to their car parked on our block. In addition to being very dangerous, it is all disturbing the peace because they have their music blasting while driving up and down the streets. On another occasion, we noticed a team member changing outside of his car out in the open. I can't even begin to tell you the ongoing problem of blocking our driveways. It's endless and to open this up to our nights would just be a nightmare.

Our neighborhood community needs to be highly considered when thinking about installing proposed lights for night games. If you were living here, how would you feel? That's a question we propose to you. We chose to live here in the Sunset district for its quiet and pleasant atmosphere. Putting up the lights would destroy that feeling and put us in misery having to deal with weekly or nightly games and the flood of SI students and their families or friends parking in our neighborhood.

Regards,
Hom Family
2170 - 40th Avenue

8/31/2015

SUPERVISOR KATY TANG
CITY HALL
SAN FRANCISCO 94102

DEAR SUPERVISOR TANG,

FIRST I WISH TO THANK YOU FOR ATTENDING OUR NEIGHBORHOOD GATHERING AND LISTENING TO THE CONCERNS OF THE RESIDENTS.

I DO HOWEVER, WANT TO REITERATE THAT I HAVE SPOKEN WITH OVER 100 PEOPLE IN THE AREA ABOUT SAINT IGNATIUS' INTENTION TO LIGHT THEIR ATHLETIC FIELD. OF THAT 100 ONLY ONE FAVORED THE LIGHTS AND ONE OTHER DIDN'T CARE ONE WAY OR THE OTHER. IN RESPONSE TO MY QUESTION "WOULD YOU HELP US STOP S.I.'S EFFORTS", YOU RESPONDED THAT YOU HAVE TO CONSIDER THE FACT THAT YOU HAVE HEARD FROM SOME WHO WANT THE FIELD LIGHTED.

I'M CERTAIN THAT YOU ARE AWARE, THAT S.I. HAS ENORMOUS RESOURCES AVAILABLE FAR AND ABOVE WHAT THE AREA CITIZENS HAVE. S.I. HAS THE ABILITY TO GENERATE MANY CALLS, LETTERS AND E-MAILS FROM ALUMNI, PARENTS AND STUDENTS WHO DO NOT LIVE NEAR 39 AVE & RIVERA AND

WOULD NOT WANT IT NEAR THEIR HOMES.

IF S.I. FAILS IN THEIR SCHEME THEIR SUPPORTERS WILL SHRUG IT OFF AS THEY HAVE GOTTEN ALONG WITHOUT FOR OVER 40 YEARS.

ON THE OTHER HAND IF S.I. SUCCEEDS THERE WILL BE ANGER AND ENMITY THAT WILL LAST FOR YEARS. THAT CANNOT BE HEALTHY FOR ANYONE.

IN ADDITION, IMAGINE ALL OF THE PROBLEMS OCCURRING AFTER DARK WHEN SOME PEOPLE HAVE HAD A COCKTAIL OR TWO. IF SOMETHING CAN HAPPEN – IT WILL.

IT IS MY SINCERE HOPE THAT S.I. WILL WITHDRAW THEIR PLANS. IF NOT WE PRAY THAT WISER AUTHORITIES WILL STOP S.I. FROM IMPOSING CONDITIONS WHICH WILL SEVERLY DISRUPT THE EVENING FAMILY LIVES OF THIER NEIGHBORS.

IT IS DIFFICULT FOR ME TO RECONCILE THE S.I. MOTTO A.M.D.G. LATIN FOR "FOR THE GREATER GLORY OF GOD" WITH WHAT S.I. WANTS TO DO TO THEIR NEIGHBORS.

SINCERELY

Jack Allen

PS GOT YOUR VOICE MAIL THANKS

9/4/2014

SUPERVISOR TANG
CITY HALL
SAN FRANCISCO 94116

DEAR SUPERVISOR TANG,

I CONTINUE TO THINK ABOUT WHAT YOU SAID ABOUT HAVING HEARD FROM SOME WHO WOULD LIKE THE SAINT IGNATIUS (S.I.) ATHLETIC FIELD LIGHTED FOR NIGHT PRACTICES AND GAMES.

THE POLICE ARE HIRED TO PROTECT ALL CITIZENS BUT WHEN ONE PERSON ATTACKS ANOTHER WE EXPECT THE POLICE TO INTERVENE ON BEHALF OF THE ONE BEING ATTACKED.

WE APPRECIATE THE DIFFICULTY OF OUR ELECTED OFFICALS IN THEIR EFFORTS TO BALANCE THE CONFLICTING DESIRES OF THEIR CONSTITUENTS, BUT S.I. WILL NOT BE HARMED WITHOUT THE LIGHTS. ON THE OTHER HAND THE AREA RESIDENTS WILL SUFFER GREATLY FROM NOW ON IF S.I. IS PERMITTED TO HAVE THEIR WAY.

THERE IS NO QUESTION THAT S.I.'S PLAN IS AN ATTACK ON THEIR NEIGHBORS.

WE HOPE FOR YOUR SUPPORT IN THIS MATTER.

SINCERELY,
Jack Allen

Nina & Jay Manzo
3025 Quintara Street
San Francisco, CA 94116
415-661-8583

August 24, 2015

Re: Proposed Lighting at St. Ignatius Fields

To Whom it May Concern:

We are opposed to the proposed lighting plans at the St. Ignatius Fields and respectfully request that St. Ignatius abandon plans for field lighting. As a family with young children, my husband and I already experience much impact from the S.I. students on our street, in our front yard and driveway, particularly with the daily parking overload of students on Quintara Street during the school year.

We share the concerns of our neighbors about these lights and feel that they are very inappropriate and detrimental in many ways to this neighborhood and the families who live here.

Thank you,

Nina Manzo
Architect AIA

Jay Manzo
Architect AIA

Julia Kwan
2139 40th Avenue
San Francisco, CA 94116-1655
(415) 412-4355

August 25, 2015

Supervisor Katy Tang
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Saint Ignatius High School ("SI") – Permanent Lights on Athletic Field

Dear Supervisor Katy Tang:

As a 23-years homeowner at 2139 - 40th Avenue, I strongly oppose Saint Ignatius' plan to erect permanent lights on their athletic field for purpose of having night games and practices because it would adversely affect the peace, traffic, parking, and lighting in our neighborhood.

After a long day of work, I always looked forward to going home to a quiet and peaceful neighborhood for the last 23 years. All these years, we like to open our vertical blinds and the windows at night to feel the nice breeze in the air as the children do their homework and study in the living room. Our family gathers in the kitchen to eat and relax together in the living room. Unfortunately, during the recent times when SI had their night games, the lights from their athletic field glared through our kitchen and living room windows. It became truly unbearable to stay in these two rooms because the lights shined into our house with such intensity. My family had to evacuate to our bedrooms, but we can still see the intensive glaring lights shining our entire living room from our beds. We ended up having to close our bedroom doors to escape the intensity of the lights. It is unfortunate and unfair that we have to tolerate this during SI's night games.

It is already bad enough that the students take up all the parking spaces on my block during the day time, now we will also be subject to parents/families taking up the parking spaces at night time if night games become a regular occurrence. This means we have to warn our own friends and families not to come visit us during SI night games. As homeowners paying property taxes to the City, why do we have to change our livelihoods to accommodate SI's desire to have night games? Such desire is not

mandatory to their livelihoods, but it would adversely affect many lives in our neighborhood. Our children would have to move into a different part of the house to escape the intensity of the lights and noises (if it's even possible) when they are doing their homework or studying for tests. Will we have to move into our bedrooms to eat dinner as well?

Lastly, the congested traffic during SI games at night had often promoted double-parking in front of the school as well as on Rivera Street (between 38th and 39th Avenue). I often had to go around cars when driving home during night games, not to mention having to be careful with all the jaywalkers who cross in the middle of this street to get to SI's athletic field.

Ms. Tang, please consider the livelihoods of the entire neighborhood and help us save the peace that is so precious to our lives.

Very truly yours,

Julia Kwan

Julia Kwan

Cc: Patrick Ruff, Principal of SI

August 25th, 2015

I Betty Lew do not want the lights put in the neighborhood
Too much noise, Too bright.
I don't want the enviromental Hazards given with lights and construction.

Betty B Lew
2190-40th Ave.
San Francisco CA
94116

August 22nd, 2015

2178 40th Ave

San Francisco, CA 94116

To Supervisor Katy Tang and others whom it may concern:

My name is Donald Ruhrmund and I live at 2178 40th Ave. I and my wife, Dr. Kai Ng, have serious concerns about the proposed addition of lights to the St. Ignatius Athletics field at Rivera St. and 39th Ave. We could not attend the community meeting due to Dr. Ng working and I having to care for our young children during the meeting. Our concerns revolve around 1) noise pollution, 2) light pollution, 3) parking and traffic and 4) property values. As the parents of young children, age 2 and 6, whose bedtimes are at 7:30 and 8:30pm respectively, we do not welcome additional noise and light in the neighborhood after 8pm. This would be a significant hardship whenever a night event was held at the athletic fields, especially if they were more than one time per week. Regarding parking and traffic, this creates a situation where we are going to be frequently unable to utilize the street parking near our house when arriving home from work. This is a strictly residential neighborhood, and the influx of traffic cannot be considered an economic gain for the area, only a hardship on local residents. Creating protected parking for residents on the nearby streets during these events could alleviate this problem. However, metered or long term paid parking would not be a welcome solution for our neighborhood. Given the hardships being created for residents in terms of parking, noise and light, I think it is reasonable to assume that properties close to the school would see some decrease in value relative to other values in the neighborhood. I also would raise the point that no one living in the neighborhood gains benefit from the athletic field or lighting as these are private properties which are not available to those of us within the community, the benefit of this project rests solely with the private students of St Ignatius. Please consider these concerns and either block the project or find ways to minimize the hardships on residents impacted by St. Ignatius's proposed plans.

Sincerely,

Donald Ruhrmund

Dr. Kai Ng M.D.

**Response to the subject that St. Ignatius College Preparatory is planning to install permanent lights on their althletic field.**

Ladies and Gentlemen,

We, the undersigned, submit this petition to the St. Ignatius College Preparatory to demonstrate our opposition to consideration of permanent lighting of their athletic Field.

5 years ago, when we planned to move, and might bought a house in San Francisco, we spend a lot of time to think where was a good/perfect place for us. We made a final decision that we bought a house here, out sunset, just because here is very safe, and quiet area with a real nice neighbors, surrounding with public library, playground, and schools. Although we are suffering from the noise, bad traffic and terrible parking, we love to be a residence here.

Now, St. Ignatius College Preparatory is planning to install permanent lights on their athletic field. Permanent lighting on a sports field in such a dense residential area strikes at the distinctive character, and has a deleterious effect on the nature of our community and threaten the very qualities that attract so many to the library and to the west sunset playground. Moreover, the installation of lights will have an immitigable effect on the quality of life for the neighborhood, which already suffers from increased noise, light, and traffic pollution resulting from the use of the athletic Field. Finally, and most important one is the safety. The reckless teenager driver always put our kids into a very dangerous situation. This will be getting worse during the game night.

For these reasons, we, the undersigned, express our opposition to the consideration of permanent lighting and ask the S.I. to end the subject in this regard.

Yulei Shang
Xialian Xu
Liyah Shang
Leon Shang

2123 40th ave

Teo Manzo
3025 Quintara Street
San Francisco, CA 94116
415-661-8583

August 24, 2015

Re: Proposed Lighting at St. Ignatius Fields

To Whom it May Concern:

I am against the lighting plan for the fields because I think it is bad for the environment, the birds, and electricity consumption.

Thank you,

Teo manze

Teo Manzo
Student
Age 10

To S.I. Hierarchy

I am Vicki Tomola living on 39th Ave at 2135 directly across from the football field and stadium and have been here since it was the sand lot across the street.

I am STRONGLY AGAINST any nighttime/evening games, practices including nighttime lighting and NOISE.

SI school does not have the right to impact the neighboring people's lives in their homes with extremely loud noise, lighting and parking issues past the end of the school day into the evening and night. You are really pushing the point and overstepping your bounds.

This is extremely inconsiderate of the SI school to plan to disrupt and disturb the people living in the homes located near the school, especially those living along 39th Ave and Rivera Street directly across from the field and stadium.

Any attempt on your part to continue these plans indicates how truly disrespectful you are and that you do not care about others. You are only focused on SI, power and greed, not caring about disrupting other people's lives.

(over)

Dear principal:

I am a 88 years old lady. I can hardly sleep at night. The night and the noise make it worse. please stop your night game and let me live a healthy and happy life for the last few years.

Thank you

Cecilia Wong

2101- 39th Ave

# ATTACHMENT 5

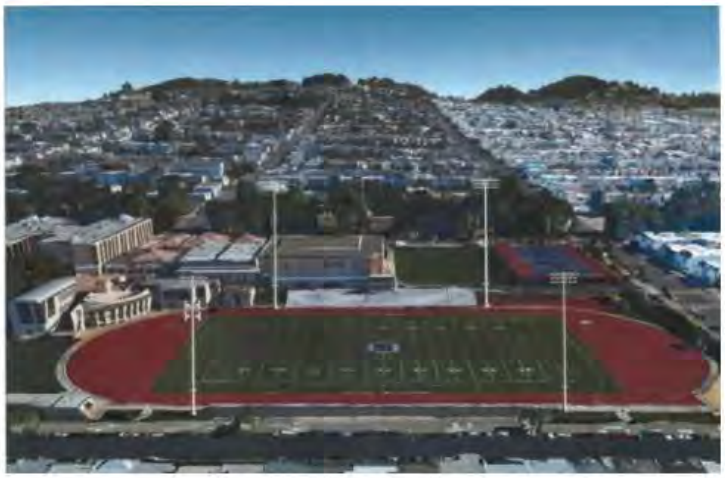
# SINA ONLINE PETITION OPPOSITION COMMENTS
# 2020

ipetitions
YOUR VOICE COUNTS

# NO To Saint Ignatius Permanent Stadium Lights

230 signers. Add your name now!

Deborah Brown 91 Comments



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 200 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

Benja

Jul 24, 2020

No lights

Anonymous

Jul 21, 2020

We live in this neighborhood for the peace and quiet. I'm completely supportive of SI Prep school, but do not support bright stadium lights and noise at night on a regular basis. Please find another venue to host regular sports events in this manner. We need our peace and quiet time. Thank you for your consideration.

Erica Zweig

Jul 21, 2020

There is no community benefit with these lights and huge disturbance to neighbors. SI claims to be "good neighbor" NOT!!

Annie Chow

Jul 18, 2020

SI must provide more onsite parking. No cell tower!

Katherine Cuellar

Jul 16, 2020

No lights! No cell tower!

Maneesh Bhide

Jul 15, 2020

I WANT to support this project, however there are four things SI would have to commit to, in writing, for me to support this project:
1) Light pollution mitigation: SI must use focused, directed lights to minimize light polution as much as possible
2) Trash:SI must articulate and commit to a plan to reduce the amount of trash brought out of SI, and into the surrounding neighborhood.
3) Parking: SI must provide more onsite parking for attendees, to support increased usage at night, when residents are most likely to desire parking as well.
4) neighborhood support: SI must provide some sort of access to the track and tennis courts for neighbors, during non school/event hours (USF does something similar).

Julie and Rob Almeida

Jun 10, 2020

1

We are against the proposed stadium lighting. We currently have a lovely view from our house, and we do not want to look out at a monstrosity of stadium lighting, especially late into the evening.
Home is a place to relax- not be bothered by massive lights shining in your windows when you are trying to sleep, or relax. Not only are they an eyesore, they will increase traffic, noise, pollution to mention a few.
Homeowners don't want to park blocks from their house because there is an additional huge influx of cars coming directly into this neighborhood. There is already an issue with SI related cars parking outside of our homes during the day.
There is an overwheling consensus among people who live here - and that is - we don't want the lights or the 5G.

Jeffrey R Crowley

Jun 10, 2020

1

No to lights on private property.Lights completely ruined South Sunset soccer field.

Adlai Manzo

Jun 09, 2020

1

NO

Jay Manzo

Jun 08, 2020

I strongly oppose this project:
1) Speaking as an architect, this project is completely out of scale with the surounding 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.

1

Kevin Johnson

Jun 08, 2020

I live on 35th Ave and I am in opposition of this project

2

Lindsay Johnson

Jun 08, 2020

I oppose

2

Melinda

Jun 07, 2020

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

2

Michael Bourne

Jun 07, 2020

No lights! No cell tower!

1

Michael Murphy

Jun 07, 2020

This project is of no benefit to the community.

1

Anonymous

Jun 06, 2020

I strongly oppose this.

1

Anonymous

Jun 06, 2020

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 noice, more cars, more violence. Our children are able to walk to the park safely ow and that will be imposible with this project.

1

Alex

Jun 06, 2020

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

1

Robert Lagomarsino

Jun 06, 2020

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.

Jack Allen

Jun 05, 2020

No lights at SI please

Louise Jonas

Jun 05, 2020

I oppose thinking the demands on high school students are high enough already. More light pollution is also undesirable.

Mary Jones

Jun 05, 2020

Too tall!!! Too bright!!!

Anonymous

Jun 05, 2020

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?

Anonymous

Jun 05, 2020

No to lights at SI

Larry Yee

Jun 04, 2020

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.

Lauren Carara

Jun 04, 2020

Not necessary!

Maria Vengerova

Jun 04, 2020

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.

Anonymous

Jun 04, 2020

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?

Ellen Scanlan

Jun 04, 2020

Light pollution is a global problem.

Daniel Dooling

Jun 04, 2020

Pleas listen, consider and join with the people of the neighborhood and do what is right for the residents of this community.

Vicki Tomola

Jun 04, 2020

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.

lei zhu

Jun 04, 2020

NO!

Joy Chan

Jun 04, 2020

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!

Mari Ho

Jun 04, 2020

I am a regular at this spot for the last 12 yrs and deeply concern about theose 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????

Stanley Chan

Jun 04, 2020

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.

Teo Manzo

Jun 04, 2020

I don't want Any Lights and having to deal with night games

Anonymous

Jun 04, 2020

No 5G in this neighborhood please!
Certainly this magnitude of lighting is not necessary!
Please reconsider! THANK YOU@

Anonymous

Jun 04, 2020

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.

Mike Foti

Jun 04, 2020

NO lights please.

Donna Bruno

Jun 04, 2020

These light stands are MUCH too tall. The number of proposed nighttime events is far too many. No to this project!!

Roger Wong

Jun 04, 2020

Nightly disruption of the residential neighborhood families and sleeping patterns is not worth playing ball that late.

David Ferguson

Jun 03, 2020

These light will infringe on people's peace and enjoyment.

Jan Rhoades

Jun 03, 2020

No to stadium lights.

Cecily Ina-Lee

Jun 03, 2020

NO STADIUM LIGHTS!!!

Patrick Schlemmer

Jun 03, 2020

I do not want these bright lights in my neighborhood.

Jerry Woo

Jun 03, 2020

No stadium lights in residential area.

Duncan Lee

Jun 03, 2020

At the end of a hard day of work all we want is A little precious time with family in the evening whether it's helping your kids with homework or getting dinner ready!

Isabelle Hurtubise

Jun 03, 2020

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 quailty of life. Please deny the permit or, at a minium, order SI to publish a sufficiently detailed plan so we can ensure mitigation of the detrimental impact on our quiet residential neighborhood.

Natalie Tam

Jun 03, 2020

We should respect the neighbors

John Rueppel

Jun 03, 2020

I support keeping this neighborhood in its current state, without g ant towers blocking everyone's view and drowning out the stars at night.

Anonymous

Jun 03, 2020

No LIghts Please!!! Share....

Adlai Manzo

Jun 03, 2020

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 woulds 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

Steven Struck

Jun 03, 2020

The addition of the stadium lights will be a disruption families along with unwanted noises. This only benefits SI, not families in the community.

Shirley Recipon

Jun 03, 2020

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.

Anonymous

Jun 03, 2020

I strongly oppose the installation of four permanent stadium lights!!

Brian McBride

Jun 03, 2020

The light are much too tall, lights are too bright st night, and cell signals are .uch too I intrusive to the neighborhood. Also, neighbors should be allowed use of the field. Parking on the surrounding streets will be impacted I to evening hours,as well.

No thank you

Meredith Kurpius

Jun 03, 2020

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.

Michele Willson

Jun 03, 2020

The negative impact on our family oriented neighborhood would be too great! NO 5G. No Lights.

Peter A Koch

Jun 03, 2020

Thanks

Kellyx Nelson

Jun 03, 2020

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.

Shirley Yee

Jun 02, 2020

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.

Jim Kurpius

Jun 02, 2020

90ft light towers in the neighborhood, 150+ nights a year, til 10pm? S.I. has no respect for the community.

Lori Ziemba

Jun 02, 2020

NO 5G, NO lights!

Lance Mellon

Jun 02, 2020

This is harmful to the environment. The fields have operated fine without artificial lights for years and can do so going forward without this.

Dolores Joblon

Jun 02, 2020

This will further disrupt a quiet neighborhood and change its character to to an ongoing carnival! Please prevent this from happening!

Gautam Shah

Jun 02, 2020

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.

Nina Manzo

Jun 01, 2020

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

Janny Lee

Jun 01, 2020

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.

Anne Marie Benfatto

May 31, 2020

The obvious lack of regard for the residents of our neighborhood by SI is shameful.

Carole Gilbert

May 31, 2020

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 crouds 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.

Mary Shea

May 30, 2020

SI knew this is a residential neighborhood when they bought the property & built the new school.

Winifred Bamberg

May 30, 2020

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.

Katherine Howard

May 30, 2020

There is already too much night-time lighting in SF. Night-time lighting is damaging to both people and wildlife.

Shirley Xu

May 29, 2020

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!

Garrick Wong

May 29, 2020

They have not and do not have any control over the their students.

Erin Tyson Poh

May 28, 2020

Do not allow this action to be rammed through without community input! Using the SIP to push through an unpopular project is unconscionable.

Jensen Wong

May 28, 2020

NO To Saint Ignatius Permanent Stadium Lights

Allen Malmquist

May 28, 2020

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.

Mafias gruffis

May 28, 2020

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

Ernest Lim and Barbara Lim

May 28, 2020

"WE DO NOT WANT THE PERMANENT STADIUM LIGHTS, PERIOD"!!!

Edmund Lim and Nellie Lew-Lim

May 28, 2020

1

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"!!!

David K Little

May 28, 2020

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.

Timothy Brey

May 28, 2020

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!

Anita Malmquist

May 28, 2020

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.

James Yee

May 28, 2020

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?

Denise Malmquist-Little

May 28, 2020

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.

Matt Ciganek

May 27, 2020

This project is clearly against the wishes of the surrounding neighborhood.

Priscilla Fong

May 27, 2020

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 staduim lights at the school.
-Priscilla Fong

Allison Harrington

May 27, 2020

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.

James R Clark

May 27, 2020

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.

Sign in to comment

SIGNATURES

| | | | | | |
|---|---|---|---|---|---|
| Dan<br>United States | Benja<br>United States | Eugene Llamera<br>United States | Siobhan Mulvey<br>United States | Nicola<br>United States | Erica Zweig<br>United States |
| Laura Peschke-Zingler<br>United States | Ralph Lane<br>United States | Jeffrey Rigo<br>United States | Jade Chan<br>United States | Annie Chow<br>United States | Chandrika Murthy<br>United States |
| Katherine Cuellar<br>United States | Maneesh Bhide<br>United States | Nora McCarthy<br>United States | Amy Wang<br>United States | Alex Bonilla<br>United States | Julie and Rob Almeida<br>United States |
| Jeffrey R Crowley<br>United States | Jennifer Bonilla<br>United States | colleen Wentworth<br>United States | Becky Zhou<br>United States | Anita Lee<br>United States | Vicky lee<br>United States |
| Yolanda Lee<br>United States | Jay Manzo<br>United States | Kevin Johnson<br>United States | Lindsay Johnson<br>United States | Kevin Sun<br>United States | Melinda<br>United States |
| Kelly Le<br>United States | Michael Bourne<br>United States | Crystal Stermer<br>United States | Michael Murphy<br>United States | Sadaf Mir<br>United States | Michelle Tam<br>United States |
| Alex<br>United States | Cynthia Skinner<br>United States | Robert Lagomarsino<br>United States | Michael Ma<br>United States | Jack Allen<br>United States | Louise Jonas<br>United States |
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| Taslim Rashid<br>United States | Mimi Leung<br>United States | Joy Chan<br>United States | Mari Ho<br>United States | Stanley Chan<br>United States | Teo Manzo<br>United States | Jacob Wang<br>United States |
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| Marykathleen stock<br>United States | Harry<br>United States | Jerry Woo<br>United States | Isabelle Hurtubise<br>United States | Duncan Lee<br>United States | Natalie Tam<br>United States |
| John Rueppel<br>United States | Philip Hung<br>United States | laura treinen<br>United States | Yuriko Kearns<br>United States | Derek Tan<br>United States | Adlai Manzo<br>United States | David Davies<br>United States |
| Joanne Lee<br>United States | Steven Struck<br>United States | Shirley Recipon<br>United States | Virginia Sturken<br>United States | Brian McBride<br>United States | Serena Llamera<br>United States |
| Lisa Struck<br>United States | Michael Yuan<br>United States | Alice Chan<br>United States | Meredith Kurpius<br>United States | Michele Willson<br>United States | Peter A Koch<br>United States |
| Kellyx Nelson<br>United States | Shirley Yee<br>United States | Jim Kurpius<br>United States | Susan rivadeneyra<br>United States | Kelsey Koch<br>United States | Tracy Ashton<br>United States |
| Tina zhu<br>United States | Donald Ciccone<br>United States | Lori Ziemba<br>United States | Lance Mellon<br>United States | Dolores Joblon<br>United States | Sandra Henderson Koch<br>United States |
| David Crosby<br>United States | Gautam Shah<br>United States | Colin Pierce<br>United States | Nichole<br>United States |

Chrisy
United States

Matthew Harrison
United States

Maryanne C
United States

Janny Lee
United States

Anne Marie Benfatto
United States

Carole Gilbert
United States

Elaine Lau
United States

Kristina Scolari
United States

Patricia Montarano
United States

Gregg Montarano
United States

Mary Shea
United States

Johnson Young
United States

Rossana chan
United States

Winifred Bamberg
United States

Katherine Howard
United States

Shirley Xu
United States

Joann Kujaski
United States

Julie Coghlan
United States

Garrick Wong
United States

Erin Tyson Poh
United States

Jensen Wong
United States

Allen Malmquist
United States

Michelle Ser
United States

Mafias gruffis
United States

Linda Delucchi
United States

Ernest Lim and Barbara Lim
United States

Edmund Lim and Nellie Lew-Lim
United States

David K Little
United States

Adelle-Akiko Kearns
United States

Timothy Brey
United States

Anita Malmquist
United States

Alan OBrien
United States

Susan Lin
United States

James Yee
United States

Denise Malmquist-Little
United States

Kristopher OBrien
United States

Barbra Paul-Elzer
United States

Debbie Montarano
United States

Paula Katz
United States

Tiffany Pavon
United States

Sun Kim
United States

Matt Ciganek
United States

Priscilla Fong
United States

Glenn Anderson
United States

Maria OBrien
United States

Matthew G
United States

Matthew
United States

Allison Harrington
United States

SEIKO GRANT
United States

James R Clark
United States

Christine Crosby
United States

Joanne
United States

Una FitzSimons
United States

Ray Brown
United States

Deborah Brown
United States

| | |
|---|---|
| **From:** | Jun Wang |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Re: File No. 200992 and 200996 |
| **Date:** | Thursday, September 17, 2020 10:25:48 AM |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Dear Mr. Norman Yee,

My name is Jun Wang. My husband Xu Liu and I have been living in the Sunset and Parkside district for more than twenty years. We have a daughter who is a sophomore at St. Ignatius College Prep.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.

There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and get good grades but to be in service to others. Many of those lessons are learned through the shared experience on the field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

Please approve lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Jun Wang

2622 36th Avenue
San Francisco, CA 94116
junwang9158@gmail.com

| | |
|---|---|
| **From:** | Molly McFadden |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | File No. 200992 and 200996 |
| **Date:** | Thursday, September 17, 2020 9:06:16 AM |
| **Attachments:** | File No. 200992 and 200996 (St. Ignatius Lights) .docx.pdf |

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September 17, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Dear Supervisors,

My name is Molly McFadden, and I'm an Alumna of St. Ignatius College Preparatory, as well as the Alumni Class Representative for the Class of 2014. I'm also a resident of the Sunset District and have been my entire life of 24 years.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with California State law.

There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the campus rather than traveling great distances to practice. If the field lights were in place during my time at S.I., I would have benefitted from them in so many ways, which is why I strongly support the approval of this project.

As a team manager for our Freshman, Junior Varsity, and Varsity football teams during my 4 years at S.I., I spent countless nights at football practice- many of which were hindered by the early sunset in the fall. My colleagues and I (all young women) had to complete our job of assisting in cleaning the field after practice and making sure all of our equipment was locked away safely. Unfortunately, all of this had to be done in the dark as we had no lights at our field. Not only was this inconvenient, but frankly, it was scary as a young woman who stands at 5'3 and only 115 pounds and was often walking to my car or to Muni in the dark.

Thankfully, our students and coaches were kind enough to look out for myself and the other team managers and walk us to our cars. All of the St. Ignatius students and staff,  as well as the surrounding residents,can feel safe at night, though, if you approve this project.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and get good grades but to be in service to others.  Many of those lessons are learned through the shared experience on the field.  Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Molly McFadden
2655 22nd Avenue
San Francisco, CA 94116

mmcfadden9614@gmail.com

September 17, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Dear Supervisors,

My name is Molly McFadden, and I'm an Alumna of St. Ignatius College Preparatory, as well as the Alumni Class Representative for the Class of 2014. I'm also a resident of the Sunset District and have been my entire life of 24 years.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance with California State law.

There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the campus rather than traveling great distances to practice. If the field lights were in place during my time at S.I., I would have benefitted from them in so many ways, which is why I strongly support the approval of this project.

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St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and get good grades but to be in service to others. Many of those lessons are learned through the shared experience on the field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

Molly McFadden
2655 22nd Avenue
San Francisco, CA 94116

mmcfadden9614@gmail.com

**From:** Maureen O"Riordan Lundy
**To:** Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS)
**Subject:** Lights at St. Ignatius
**Date:** Thursday, September 17, 2020 8:57:36 AM

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: File No. 200992 and 200996

Dear President Yee and Members of the Board of Supervisors:

Our family has lived in Parkside and the Sunset districts for more than 30 years – 25 years just three blocks from St. Ignatius Prep. Our three adult children graduated from St. Ignatius and continue to work professionally in the Bay Area, two in the medical field and currently on the front lines of the pandemic, the third a high school teacher. My husband and I consider their education at St. Ignatius to be the foundation on which they built their professional education. On graduating from St. Ignatius, they were ready to commit to university; and on graduating university with various distinctions, to take on careers that support and enhance the quality of life for all in their native city. The opportunity to be educated at a Jesuit school presented a major financial challenge for us, an immigrant family. We will always be thankful for the decision we made in sending our children to St. Ignatius, and we wish to support St. Ignatius in its effort to continue to provide for its student population.

My husband and I are writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.

There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the campus rather than traveling great distances to practice.

Since first drafting this request on behalf of St. Ignatius College Prep, the racial

inequalities and injustices in our nation have become central to our thinking. In this context, we ask the members of the Board of Supervisors to consider St. Ignatius College Prep's solid commitment to addressing racial inequality and to implementing an anti-racist inclusive curriculum throughout its campus. This commitment is articulated on the school website *Confronting Racism and Other Forms of Oppression at St. Ignatius College Prep* - a commitment already visible in the recent opening of the Fr. Sauer Academy.

Men and women educated at St. Ignatius College Prep provide leadership in all areas of life in this city. They are front-runners in service careers, and in nonprofit and volunteer projects wherever they settle. Important lessons in teamplay, in sustained commitment, in valuing the contribution of every member, and in stepping up to the plate when needed are learned through shared experience on the field. Students who participate as spectators along with their families gain a strong feeling of community by supporting their friends and fellow classmates and by witnessing their school commit to confronting racism and other forms of oppression in the classroom and on the playing field. This is the vision needed in our city at this moment in history. Every effort should be made to support the development of community and the inclusion and recognition of the gifts of every individual in the pursuit of common goals. Where better to naturally nurture this growth than on a sports field?

Please vote YES! to the lights at St. Ignatius Field, yes to the consistent development of community and leadership in our youth, and yes to the firm anti-racist and anti-oppression stance SI is taking.

Finally, good government serves the common good rather than individual desire. While the new lights may cause some discomfort to a few in the neighborhood, the greater good is served by supporting an institution which contributes so much to the good of the city and the wider community. We feel comfortable saying this since we also live right here in the area that may be affected by changes in SI.

Thank you for your consideration.

Sincerely,

Seamus and Maureen Lundy
2174 33rd Ave.
San Francisco, CA 94116
Oriordanmaire524@gmail.com

**From:** Julie Almeida
**To:** Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS)
**Subject:** Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648
**Date:** Thursday, September 17, 2020 8:54:12 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

September, 2020

Dear Mr. Mar and Members of the SF Board of Supervisors,

We live in the Sunset District a couple of blocks from St. Ignatius College Preparatory.

We moved into this quiet, residential neighborhood knowing of the several recreational areas along with gardens, parks, public schools and one private school, St. Ignatius College Preparatory. One of the many reasons for living here is that it is peaceful. We can usually park in front of our house or close to it. We also have a young child and it is important to us that she continues to live in a quiet, safe neighborhood that is family oriented.

Increasingly, over time, we have found that certain night and weekend events that are held by St. Ignatius College Preparatory have made it more difficult to park close to home, and the noise is irritating. Especially when you have worked all day and are looking for some respite at home. As we mentioned, we have a young child and it is important she stays on schedule with bedtime at 7pm. We also retire to bed early due to a very early morning start. We would not want our home under floodlights until 9pm or 10 pm in the evening.

We are strongly opposed to the St. Ignatius plan of holding 150 or more-night events, with lights shining right into our windows. Their sports field is surrounded by small, Quiet residential homes. We do not want our downtime to be shattered by the noise of a sports commentator late into the evening. Nor do we want to feel like someone has a flashlight directed into our faces when trying to relax or sleep, when they turn on their proposed 90-foot-tall lights. We LIVE here. This lighting project adds NO value to our neighborhood.

St. Ignatius College Preparatory would like to turn our quiet neighborhood into a noisy sports arena. There will be more cars parking in our neighborhood, making it much more difficult for people who live here to find parking. Noise levels will increase, light will be shone late into the night, people blocking our driveway, more trash on properties and around the streets etc. We have experienced this first hand when SI rent currently rent night lights for evening events. No thank you.

The students at SI consist of 60% who live in San Francisco. Of that 60%, a very

small percent in the Sunset. There are 40% of students who live outside the city. This causes a great influx of people coming into our neighborhood 150+ nights per year – making noise, disrupting our family time, consuming parking spots, littering the streets. Not to mention the 90 foot high lights right outside our home.

There are no other schools in San Francisco that have issues scheduling events during daytime hours. Nor are they trying to make profit by renting out their space while circumventing loopholes to create “affiliates” to rent to with employees working for both SI and the “affiliate”.

In addition to the resulting disruption and disregard for Sunset residents will be the upheaval of construction noise, and more.

As representatives of the residents of San Francisco, please stop the SI project to light and use their football field at Rivera St and 39th Avenue 150+ nights per year.

Please keep the Sunset District a quiet, safe residential family neighborhood.
Thank you.

The Almeida Family

35Th Avenue, at Rivera

| | |
|---|---|
| **From:** | Joseph Grant |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Cathrine.Stefani@sfgov.org; Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Subject:** | Appeal of CEQA exemption determination and conditional use Authorization-2001-37th Ave.-CUA #2018-012648 |
| **Date:** | Thursday, September 17, 2020 8:51:37 AM |

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Dear members of the SF Board of Supervisors

I have lived near Saint Ignatius College Preparatory high school (SI) for 40 years.

I oppose the installation of permanent night lights on their football field.

The administration of SI is confusing what they want for what they need and are pursuing their wants without regard for the needs of the resident community around the school.The extent of the negative effect on the neighborhood of having these lights on until at least 9 PM for 150 nights a year is being ignored because of what the supporters of these lights want.

Neighborhood residents need our homes to continue to be the place we can go to rest, relax and feel safe. For our physical and mental health we need our homes, at least, to not add to our stress.

The school needs to teach the students to be responsible for their choices and actions, to have respect for the community. The school should not teach that they can have their cake and eat it too if there is enough money and influence.

SI is claiming to produce the leaders of the future and yet waking up early to play their chosen sport is too hard for them? Leaving class early to drive to a field with existing lights is too hard? Every other student in every other school in San Francisco is managing it.

Please prevent this project from going forward.

Thank you,

Joseph Grant

| | |
|---|---|
| **From:** | Roger |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); SISunsetNeighbors @hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Permit, Proposed Project, 2001 37th Avenue, #2018-012648CUA |
| **Date:** | Wednesday, September 16, 2020 11:47:05 PM |
| **Attachments:** | 20-0916_BOS_2018-012648CUA.pdf |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the SF Board of Supervisors:

I am writing this attached letter on behalf of my family and Outer Sunset neighbors who support Saint Ignatius and Sports, but strongly oppose the current St. Ignatius plan to introduce new nighttime football usage by lighting their football field. Thank you.

Kindest Regards,

Roger Wong

Virus-free. www.avg.com

September 16, 2020

**San Francisco Board of Supervisors**
via email:
Board.of.Supervisors@sfgov.org
Gordon.Mar@sfgov.org
Catherine.Stefani@sfgov.org
dean.preston@sfgov.org
Matt.Haney@sfgov.org
mandelmanStaff@sfgov.org
Shamann.Walton@sfgov.org
Aaron.Peskin@sfgov.org
Ahsha.Safai@sfgov.org
Hillary.Ronen@sfgov.org
Norman.Yee@sfgov.org
Sandra.Fewer@sfgov.org
sisunsetneighbors@hotmail.com

**RE: Appeal of CEQA Exemption Determination and Conditional Use Permit, Proposed Project, 2001 37th Avenue, #2018-012648CUA**

Dear Members of the SF Board of Supervisors:

I am a 45 year San Francisco resident, tax payer, voter, and community member in the Outer Sunset neighborhood with my wife and two kids. I am writing this letter on behalf of my family and Outer Sunset neighbors who support Saint Ignatius and Sports, but strongly oppose the current St. Ignatius plan to introduce new nighttime football usage by lighting their football field with 90'-0" tall high intensity LED arrays, and to hold 150+ night time games and events up to 9-10 pm throughout the week. Saint Ignatius High School is a respected school, and have been good neighbors in general. My kids have participated in summer school programs and sport camps with their organization. We support education, sports, and the responsible mental and physical health development of our youth, our future. We, however, strongly cannot support the proposed project due the many incompatible and conflicting nightly impacts with the neighborhood. There are currently no San Francisco High School, public or private, with nighttime illuminated ball fields, with good reason.

The location of the project is critical. The project site is in direct proximity across the street to its single family residential neighborhood. Living rooms of two story homes literally open up to the football field across the small residential street with a chain-link fence. There are no medium density commercial buildings, grove of trees, concrete sound walls, or transitional physical distanced buffer zone to help mitigate a new nighttime source of traffic, sound, and

reflected light spill off. As comparison, the Beach Chalet Soccer Fields are separated from the nearest residence by approximately 780ft distance, and buffered by trees 40'-50' tall. The proposed nighttime game usage is just in conflict with the quiet residential neighborhood at a time when all families are at home, students are doing homework and studying, families are spending family time together, and younger kids and older folks go to bed early. As part of its traffic mitigation plan, Saint Ignatius plans on routing additional auto traffic onto neighborhood Ortega Street from Sunset Boulevard where there are no left turns allowed by north bound traffic. Ortega Street is already heavily impacted due to shared cross traffic for A.P Gianni High School, Sunset Elementary School, Saint Ignatius, The West Sunset Library, West Sunset Playground, and the West Sunset Baseball and Soccer Fields run by SF Parks and Rec. Mix this traffic at a later rush time commute, with the added cover of darkness, is a recipe for disaster.

The project should not have qualified for a CEQA exemption. While Saint Ignatius High School and its football field are existing, the current uses are under normal daytime school uses. The current project adds permanent night time lighting, and introduces new drastic nighttime sports usage to weekend and weeknights up to 150 nights, up to 9-10pm, that are just too late for a quiet residential neighborhood. As such, the project should not have received categorical exemption under CEQA, which would resulted in the needed impact studies to the neighborhood in terms or traffic, parking, noise, and light pollution. Without these impact studies, the detrimental impacts of the project to the neighborhood will not be identified, nor any attempts to mitigate them during design. While it is understandable that augmented artificial lighting may help during seasons where daylight is shortened, to allow extended sports practice time after school, the duration of the usage is not only objectionable to the neighborhood, but also detrimental to the students themselves. Being supporters of competitive sports, we understand that afterschool practice is a necessity, but by no means should students stay to practice until 9 to 10 pm into the night. As a balance to their physical health, they must also maintain their mental health by going home to a healthy meal, study/read for their mental health, and most importantly, get adequate rest before another day of school. The school should sync their schedule harmoniously with that of the neighborhood's.

The design of the lights itself is questionable. The four proposed 90'-0" high poles are the tallest to be proposed, even for public ball fields controlled by Parks and Rec. The height limit of the neighborhood is forty feet, with most residential buildings at two stories, approximately twenty feet tall. The proposal seeks to go above the height limit of 40'-0" by over 200%, and taller than the adjacent 20'-0" residences by 450%. The proposed light fixtures dwarfs the scale of the neighborhood and will be visible from far distances. The proposed lighting level limit for the football field is currently up to 65 foot candles according to Musco Photometrics data. This lighting level is unnecessarily high for recreational usage. This photometric data is provided by the applicants own lighting vendor, and has not gone through an official independent lighting impact review. Under Musco's own data, glare and spill off will impact the neighborhood, with the largest impact on the immediate residences. As we do not currently live directly adjacent to

the project, we share in the responsibility in doing the right thing for our neighborhood community. The reflected light off the field, amplified by any fog would also negatively impact the night sky and create a sky glow effect. Additionally, LED lighting may have some benefits in terms of efficiency and better direct lighting, but such specified lighting emit large amounts of blue light that have detrimental effects in circadian sleep rhythms.

The proposed nighttime football field usage and lighting conflicts with The San Francisco General Plan, the foundation for establishing goals, purposes, zoning and activities allowed on each land parcel to provide compatibility and continuity to the entire region as well as each individual neighborhood.

Excerpts from General Plan:

## NEIGHBORHOOD ENVIRONMENT

### Human Needs

"The people of San Francisco are the city's reason for being and its hope for the future. Most residents live in areas that can be characterized as distinct neighborhoods, and the quality of these neighborhoods has a strong effect upon their personal outlook. Neighborhood quality is of overriding importance to the individual, since the most basic human needs must be satisfied close to home. The long-term future of the city's entire physical environment may also depend upon good neighborhoods, because only when they find satisfaction in their own areas can residents freely turn their attention to matters affecting the larger community.
There is no great difference of opinion as to what makes a neighborhood a good place to live from an urban design standpoint: people wish to have a tolerable and comfortable living environment, safe and free from stress, and the elements that make up such an environment are easily described. People also wish to know that their neighborhoods will be guarded against physical deterioration, and that any elements they consider deficient are likely to be improved. Because neighborhood quality is defined in the residents' own terms, the neighborhood environment will be better if residents participate in the planning of local improvements. Studies show that the outstanding concerns of people today in their neighborhood environment are matters of health and safety. Traffic is the leading issue, with automobiles moving through residential areas in large volumes and at high speeds, producing noise and pollutants and putting pedestrians in constant danger. With each increase in traffic the streets become less a part of the living environment and more a world of their own. Residents find the streets unsafe and unpleasant, and try to shut them out..."

4.1 Protect residential areas from the noise, pollution and physical danger of excessive traffic.

### 4.15 protect the livability and character of residential properties from the intrusion of incompatible new buildings (or impacts of such)

Saint Ignatius High School has a great reputation as a college preparatory. Their proposal to install new football field lights to extend new night time uses up to 9-10 pm, however, is a mistake. The impacts of this permanent installation is unbalanced and will forever alter the livability of the neighborhood environment, a direct contradiction of San Francisco General Plan. We support Saint Ignatius, team sports, the health and development of our youth, but we strongly do not support the artificial lighting for the proposed nighttime usage and duration. We kindly request that you consider our appeals to the project's erroneous claim of exemption to CEQA and the CUA, so that needed independent EIR studies can be performed and that the project proposal and conditions can be amended appropriately. The interest of a community component must be balanced with the interest of the community it is part of.

Best Regards,

Roger Wong
1894 41st Ave
San Francisco, CA 94122

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|---|---|
| **From:** | lawrence yee |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Wednesday, September 16, 2020 10:18:36 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Honorable Board of Supervisors,

My name is Larry, and I live across the street from St. Ignatius College Preparatory (SI). I am strongly opposed to the SI plan to light their main field and hold 150 or more-night events. SI wants to illuminate their field to a professional level and utilize it into the night which will adversely effect our way of life since we live within the reach of these lights.

I am an essential worker who works at night, and it is important that I have adequate rest to do my job at the best of my abilities. Having evening events will impact my sleep since I take a nap before my shift begins at 11pm. The noise from the events and lights on the field will disrupt my ability to rest properly.

I moved into this RESIDENTIAL district aware of the multiple recreation fields, public schools, gardens, and one PRIVATE high school. I could come home and park my car near my home if not directly in front of my home. The neighborhood was clean and it was safe. Nights were quiet. The Sunset District was very family oriented.

SI wants to turn our residential family neighborhood into their private sports event complex, even though only a very small number of students actually live within the area. Their plan to install 90-ft stadium lights will NOT benefit the neighboring community as a whole. The night events will overrun our neighborhood with cars parking, double parking, sometimes reckless driving, all bringing teens and adults from beyond our neighborhood and even beyond San Francisco (40% of their student population is from outside of the City) to SI -- taking up residential parking space, making noise at high levels and disrupting family time in our homes, leaving behind garbage & trash on our property, and on public streets/sidewalks. SI wants to do all this for 150 or more nights a year. No other high school in the City does this.

We have direct experience when SI rented night lights in the past. The front two rooms of our house were lit up despite having the shades drawn. We had to turn the volume up on our television but still couldn't enjoy the show being televised. Those were frustrating evenings I don't want to experience 150 nights a year!

Please, as representatives of the residents of San Francisco, please stop the SI project to light and use their football field at Rivera St and 39th Avenue 150+ nights per year.

Please keep the Sunset District a residential family neighborhood.

Thank you.
Larry.

| | |
|---|---|
| **From:** | Peter Koch |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Wednesday, September 16, 2020 8:29:28 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the San Francisco Board of Supervisors,

Our names are Peter and Sandy Koch, and we live in the Sunset District at 2825 Rivera Street. As San Francisco taxpayers and voters, I support the St. Ignatius Neighborhood Association appeals against the proposed St. Ignatius permanent stadium lights.

We have lived in the Sunset District directly across the street from the St. Ignatius football field for almost 30 years. We have raised a family here and love San Francisco, especially this community. We have been good neighbors with St. Ignatius during all of their past sporting and outside events. In fact, both of our kids attended St. Ignatius and had positive experiences with the school and sports program, graduating in the classes of 2010 and 2012.

St. Ignatius's proposal for permanent lights to have Friday night football games and approximately 150 nights of lights until 9:00 PM is unacceptable. This residential neighborhood is composed of many young families with small children, and these large events will permanently change the character of this quiet, close-knit neighborhood and community.

During past Friday night football games, we did not complain because we thought these would be one-time events. However, all the noise, garbage, and traffic directly related to these events was very disruptive. These proposed events will host over 2,000 visitors, both home and away guests, which presents tremendous issues for this community. We had problems accessing our garage due to cars parked in our driveway and had to park several blocks away from our home. Outside of the lighting issue itself, these large events cause an enormous amount of disruptive noise. It goes directly against the peaceful community we have worked so hard to develop in this district. These events will overwhelm and completely alter the essence of our neighborhood.

This project does not represent the interests of the Sunset District, not the San Francisco residents and taxpayers. St. Ignatius serves a private population of students, many who do not even reside in San Francisco. A large portion of their student body commutes from San Mateo and Marin counties. These are the only people who stand to gain any benefit from this proposal, and they are not even residents of this city.

As a third-generation native San Franciscan, I urge you to please keep the Sunset District a quiet, residential family neighborhood. We have worked hard to build and support this neighborhood. We are not against change. We actually enjoy watching this neighborhood grow and develop throughout the years. This project only stands to benefit a small group of students, while altering an entire community of residents and every aspect of our daily lives.

Thank you for your time and consideration in this process,
Peter, Sandy, Jake, and Kelsey Koch
2825 Rivera Street San Francisco, CA, 94116

| | |
|---|---|
| **From:** | Teo Manzo |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com |
| **Subject:** | SI Lights |
| **Date:** | Wednesday, September 16, 2020 8:25:36 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

My name is Teo Manzo I am a sophomore at George Washinton high school. I live right down the block from Saint Ignatius. Almost every day Before the Coronavirus I would come home to seeing SI athletes using a hill of Quintara street between 39th and 40th Ave as a hill to run-up as an exercise. They will continually run-up all while the coaches are screaming and yelling. To me, this isn't a huge problem while loud and sometimes annoying this is the least of my concerns. After that, the soccer practices would start and go on until around 6 or 7. Then it finally becomes peaceful, however, if SI were to build these lights that all changes. SI football games are already loud from the announcers and cheering. If this were to happen at night it would be exponentially more annoying. I've gone to many of my school's football games and other school's football games some of which were night games, and I have not noticed anything special about them matter of fact I prefer day games a lot more than night games. Combined with the aspects of partying at night, teens drinking, smoking (I’ve seen this happen before at SI and at my own school's football games so I know for a fact that this would happen here) and garbage. That would make things even worse with this happening 3 times a week. So please do take this letter into consideration when you make the verdict.

Thank you for reading

-Teo Manzo

| | |
|---|---|
| **From:** | Greg Teshara |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Cc:** | Gregory Teshara |
| **Subject:** | SUPPORT LETTER for Installation of Lights at St. Ignatius Field (File No. 200992 and 200996) |
| **Date:** | Wednesday, September 16, 2020 5:12:37 PM |
| **Attachments:** | FileNo.200992and2009966_LetterofSupport_16Sep20_TeshraGregoryLdocx.pdf |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

***Attached & Referenced Below***

***September 16th, 2020***

*President Norman Yee and Members of the San Francisco Board of Supervisors*
*c/o San Francisco City Hall*
*1 Dr. Carlton B. Goodlett Place, Room 244*
*San Francisco, CA 94102-4689*

***VIA EMAIL***

***RE: SUPPORT LETTER for Installation of Lights at St. Ignatius Field (File No. 200992 and 200996)***

***Dear President Yee & Honorable Supervisors:***

***Thank you for taking the time to receive and review this letter in support of the installation of lights at St. Ignatius (S.I.) Field.***

***My name is Greg Teshara and I am a proud native San Franciscan, homeowner in District 4 and member of the St. Ignatius Class of 1998. I blessed to be the son of two native San Franciscans (homeowners in District 7 for over 40 years) and have been born into the Hennessy / Teshara Family that has for decades been involved in our communities through civic engagement, public service and elected office. Most importantly, I am the father to two wonderful little boys, Benjamin Mathew (St. Stephen) & Declan Gregory (Lakeside Presbyterian) - St. Ignatius Classes of '32 & '35, hopefully.***

***Today it is a privilege to write to you and ask for your support and approval of installation of lights at St. Ignatius Field in order to create more options and opportunities for our students while allowing the school to implement a later start time for certain athletic and community events in accordance to CA State law.***

***As the current COVID-19 pandemic has acutely shown, the need for safe outdoor areas for recreation and athletic teams to practice are in greater need than ever. Unfortunately, as we all can recognize, there are fewer spaces for students to practice field sports in our City and allowing S.I. to install these lights will keep students closer to the campus rather than being forced to travel great distances – all at an expense to the student athletes, St. Ignatius and the environment.***

***For decades St. Ignatius College Preparatory, at its very core, has been an outstanding center of learning creating men and women for others! This foundation is not only about being able to study hard, take tests and get good grades – but to be always present <u>in service of others</u>. As team-centered experiences in your own lives has likely shown, many of those lessons are learned through the shared experience – and often extend to spectating students, families and friends who participate in the creation of community by supporting their classmates, children and friends.***

***Please vote YES! on the installation of the lights at St. Ignatius Field and thank you for your consideration.***

***Sincerely & Warmly Yours,***
***Greg Teshara, S.I. '98***

**GREGORY L. TESHARA**
San Francisco / CA / 94122-4244
C: 415 317 3942
E: GTeshara2002@yahoo.com (personal)

*FROM THE DESK OF*

# GREGORY L. TESHARA

2024 Ortega Street - San Francisco, CA 94122-4244
P: 415 317 3942 / E: GTeshara2002@yahoo.com (personal)

**September 16th, 2020**

President Norman Yee and Members of the San Francisco Board of Supervisors
c/o San Francisco City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

**VIA EMAIL**
RE: SUPPORT LETTER for Installation of Lights at St. Ignatius Field (File No. 200992 and 200996)

Dear President Yee & Honorable Supervisors:

Thank you for taking the time to receive and review this letter in support of the installation of lights at St. Ignatius (S.I.) Field.

My name is Greg Teshara and I am a proud native San Franciscan, homeowner in District 4 and member of the St. Ignatius Class of 1998. I blessed to be the son of two native San Franciscans (homeowners in District 7 for over 40 years) and have been born into the Hennessy / Teshara Family that has for decades been involved in our communities through civic engagement, public service and elected office. Most importantly, I am the father to two wonderful little boys, Benjamin Mathew (St. Stephen) & Declan Gregory (Lakeside Presbyterian) - St. Ignatius Classes of ’32 & ’35, hopefully.

Today it is a privilege to write to you and ask for your *support* and *approval* of installation of lights at St. Ignatius Field in order to create more options and opportunities for our students while allowing the school to implement a later start time for certain athletic and community events in accordance to CA State law.

As the current COVID-19 pandemic has acutely shown, the need for safe outdoor areas for recreation and athletic teams to practice are in greater need than ever. Unfortunately, as we all can recognize, there are fewer spaces for students to practice field sports in our City and allowing S.I. to install these lights will keep students closer to the campus rather than being forced to travel great distances – all at an expense to the student athletes, St. Ignatius and the environment.

For decades St. Ignatius College Preparatory, at its very core, has been an outstanding center of learning creating men and women for others! This foundation is not only about being able to study hard, take tests and get good grades – but to be always present in service of others. As team-centered experiences in your own lives has likely shown, many of those lessons are learned through the shared experience – and often extend to spectating students, families and friends who participate in the creation of community by supporting their classmates, children and friends.

Please vote YES! on the installation of the lights at St. Ignatius Field and thank you for your consideration.

Sincerely & Warmly Yours, *Greg Teshara, S.I. '98*

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|---|---|
| **From:** | vicki Tomola |
| **To:** | Board of Supervisors, (BOS) |
| **Subject:** | My Concerns about SI institution |
| **Date:** | Wednesday, September 16, 2020 5:05:39 PM |
| **Attachments:** | Concerns.docx |

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This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello,

I am once again attaching my letter concerning a powerful entity, SI, attempting to permently disrupt families and residents home life that live in this Sunset neighborhood community that we all call home. This neighborhood is OUR HOME, the SI students are only visitors to this neighborhood for a period of time, and they will move on.

Vicki Tomola

Sent from Outlook

My name is Vicki Tomola and I am at 2135 39th Ave

I am a long time resident of the neighborhood and actually have fond memories of the sandlot. I am against the SI institution's plans of stadium lights, cell tower antennas and nighttime activities planned for three quarters of the year. This is TOTALLY UNACCEPTABLE!!!

The topic of concern here is not about the academics of this school, it is not about the sport programs that are offered, it is not about who attends this school, nor is it about who attended this school or how well a past student is doing; the topic is solely about nighttime lighting and activities that will cause noise and commotion disrupting the residents and their families during the evenings in their own homes for three quarters of the year, year after year.

For a very long time now, there is and has been the ongoing problem of the major impact of parking in this neighborhood due to the SI students. I would like to know where is SI going to have their students & attendees park during these night activities? They surely will not be allowed to continue to park all over the neighborhood well past the afternoon into the evening and nighttime hours. It will be mandatory that SI supply a parking area for all these students and attendees. Parking has been an ongoing problem for many, many years. When this school first opened in the seventies there were not this many student drivers overtaking all the parking in the neighborhood. As the number of student drivers increased the school has never attempted to supply parking for them and has done nothing to rectify this major problem nor has the City.

I also have concerns about the Verizon cell antennas and the health risk to the residents and children from the exposure to electromagnetic waves emitted from this equipment. Has a health report been submitted along with these plans? Has the SF Health Dept. approved these antennas on a school site with children, and in a neighborhood with homes (some ~100 feet away) that have families and young children? How can this City, (the mayor,

supervisors, and other representatives) approve and allow SI to possibly risk a person's health, a child's health? What about the health risk of the students attending this school? Where are all the environmental impact reports on all these issues of light and noise pollution, electromagnetic waves, traffic emissions, CO2 and greenhouse gas emissions, congestion and parking? All these reports need to be issued and distributed to every resident in this neighborhood.

This SI school continues to be extremely selfish, and is very inconsiderate and thoughtless of the neighboring families and it's obvious that they plan to continue to take advantage of us. They truly do not care who they trample on to get what they want. This current issue is about the disruption and invasion of our families' evening home life with nighttime lighting, noise, commotion and parking. Then, there is the possible health risk from living near this school.

I hope that The City, it's departments, and it's commissioners and supervisors that are representing the people of this city will truly listen and take to heart what the residents & families of this neighborhood are saying, their concerns, what they and their families living in this neighborhood want, what they and their children deserve. Just think of the disrupting impact this will permanently have on the families and residents of this neighborhood community who have established a life here, especially of those living directly across the street from the field.

Do not forget that the students of SI are visiting at this location in our neighborhood for a short period of time, they will come and go. We Live Here!! This is our home!!

Longtime Resident,
Vicki Tomola

| | |
|---|---|
| **From:** | lauriemwilliams@aol.com |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | File No. 200992 and 200996 |
| **Date:** | Wednesday, September 16, 2020 4:20:01 PM |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: File No. 200992 and 200996

Dear Board of Supervisors,

My wife and I are contacting you to request your approval for the lights at St. Ignatius field. As background information, here is some info about us and our thoughts about this subject.

We were born, raised, educated, married, worked, and still live in San Francisco. We currently reside on 36th Avenue near St. Ignatius (SI). We are now retired senior citizens that continue to love and enjoy living in our wonderful city by the Bay.

Given that I am a graduate and our son and daughter are graduates of St. Ignatius, we are familiar with the school's mission and its rich tradition in developing young men and women to be good citizens and contributing members in our society.

To further facilitate the development of our children, the building of lights at St. Ignatius field will provide more and better options to thousands of future students. Students can participate in sports as athletes, support staff, and spectators more frequently on the SI campus rather than traveling to other venues, where availability in San Francisco is limited and travel time sometimes extensive. Also, as we understand, the lights will allow SI to implement a later start time in accordance with California State law.

We respectfully urge you to please vote YES in favor of adding the lights at St. Ignatius field. Thank you for your consideration.

Sincerely,

Stephen and Laurie Williams
1994 - 36th Avenue
San Francisco, CA 94116

(Our Email: lauriemwilliams@aol.com)

| | |
|---|---|
| **From:** | Diane Marbello |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); SISunsetNeighbors @hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Wednesday, September 16, 2020 2:55:45 PM |

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September 16, 2020

Dear Mr. Mar and Members of the SF Board of Supervisors,

I live in the Sunset District near St. Ignatius College Preparatory. As a residence, taxpayer and a voter I am strongly opposed to the St. Ignatius plans to light their main field and hold 150 or more-night events until 9 pm on weekdays and 10 pm on weekends. The area around St. Ignatius College Preparatory is a residential neighborhood and is unlike public lands like Balboa Park and the Beach Chalet fields, surrounded by Golden Gate Park and Ocean Beach that are not disruptive to residences. This project has no public value, it is for SI's private use only. Yet, it will have a direct effect on the quality of our quiet residential evenings. The field they want to illuminate to a professional level and utilize into the night is bounded by my residential family neighborhood - it is closely bordered by the homes in which we live.

I moved into this RESIDENTIAL district aware of the multiple recreation fields, public schools, gardens, and one PRIVATE high school. I can come home and park my car in front of my home. The neighborhood is clean and safe. Nights are quiet. The Sunset District is very family oriented.

However, it was until SI started renting the night-lights on Friday nights and although we as neighbors were inconvenienced, we tolerated it. Especially knowing that our children did not have school the next day and it did not happen all the time. Now with only 60% of St. Ignatius students who live in San Francisco and only a small percent of that in the Sunset, SI wants to erect permanent 90-foot-tall light standards with huge light arrays in a residential neighborhood with single family, two story houses, and height limits. This will not be just a couple of Friday nights a year this would be for 150 or more night events each year and would turn our residential family neighborhood into their private sports event center.

These night events will not only be extremely disruptive to our families, but they will overrun our neighborhood with cars parking, double parking, blocking our driveways, sometimes reckless driving, all bringing teens and adults from beyond our neighborhood and even beyond San Francisco (since 40% of their private population is from outside the City) to SI. In addition, taking up residential parking space, making

noise at high levels and disrupting family time in our homes, leaving behind garbage and trash on our property, and on public streets/sidewalks. Where are we to park our cars in the evenings?  There are many senior citizens/handicap people living in the neighborhood. Having lights for 150 or more nights a year would make it impossible for them to go out at night, even to the grocery store, as they would not find parking in front of their homes when they returned.

There is no other high school in San Francisco that has lights or is having a problem scheduling all of their teams without night events. In addition, no public school is determined to make a profit by renting private event space to "affiliates" by linking these other private institutions to themselves by assigning an employee to work for both. Beyond all of the resulting disruption and disregard for Sunset residents will be the construction trucks, supplies, noise and dirt, shaking due to pilings, and more.

As I mentioned above, we have had direct experience when St. Ignatius has rented night-lights in the past and are very much aware of the impacts (noise, traffic, parking problems, littering, late night drinking/smoking, etc.) due to their night events.

Please, as representatives of the residents of San Francisco, please stop the SI project to light and use their football field at Rivera St and 39th Avenue 150+ nights per year.

Please keep the Sunset District a residential family neighborhood.

Thank you,

Diane Marbello
39th and Quintara Street
San Francisco

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|---|---|
| **From:** | Annie Moriarty |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | File No. 200992 and 200996 |
| **Date:** | Wednesday, September 16, 2020 2:47:25 PM |

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Dear President Norman Yee and Members of the San Francisco Board of Supervisors:

***I'm writing to convey my strong support for the approval of the lighting project at St. Ignatius College Preparatory's ("SI") field***.

I grew up in San Francisco's Sunset District. I left San Francisco to attend college, but returned to attend law school. I've lived at 2127 25th Avenue for the last 10 years with my husband and 3 children – making a home for my family in the very area I grew up. Two years ago, I started working at SI. I'm a firsthand witness to what a great school and community it is.

Academic excellence is part of an SI education, but we know that so much learning happens outside the classroom. Learning happens out in the community, being of service to others. It happens in the theater where students practice and perform a school play. And it also happens on the field, participating in SI's extraordinary athletic programs.

Building these lights will allow busy student athletes more use of the field that is right on campus, giving them back precious time previously spent traveling to off-campus practice locations. The project will also allow SI to implement a later start time to the school day. This change will benefit the entire student body. Indeed, research shows that teenagers need more sleep to perform well in school and California law supports later start times. When life returns to normal, students will be able to attend games right on campus, giving them a chance to support their friends and classmates, build community and make memories together.

***Please affirm the San Francisco Planning Department's vote in favor of this project.***

Thank you for your consideration.

Sincerely,

Annie Reilly
2127 25th Avenue
San Francisco, CA, 94116

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|---|---|
| **From:** | Phillip Loeffler |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS) |
| **Cc:** | Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Lights at St. Ignatius |
| **Date:** | Wednesday, September 16, 2020 10:16:32 AM |

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President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: File No. 200992 and 200996

My name is Phillip Loeffler and I am a graduate of St. Ignatius College Prep (c/o 2011). I was born and raised in the City and the only extended period of time I spent away from San Francisco was to attend UC Davis for college. My first year out of college I completed a year of service as an Alumni Volunteer Corps (AVC) member at St. Ignatius, so the school definitely has a special place in my heart.

I'm writing in strong support for the approval of lights at the St. Ignatius Field. The field is used by several different sports and club teams. As a former cross country and track & field athlete and coach I definitely used the track a fair amount. The addition of lights would create more opportunities for all students and would allow SI to implement a later start time in accordance with CA State law.

There are fewer safe spaces for kids in San Francisco to play sports outdoors, and the installation of lights will keep kids in a safe space where they feel comfortable and able to engage in sports.

Saint Ignatius has offered Bay Area students the opportunity to get a great all-around education. Students learn to live out the Igantian motto, "with and for others". This lesson can be learned in the classroom, but definitely comes into practice on the field. Students learn to respect their teammates, their competitors, and themselves.

Thank you for all your work and please vote YES! on the installation of lights at Saint Ignatius field.

Sincerely,

Phillip Loeffler '11

757 16th Avenue, San Francisco, CA 94118

ploeffler055@gmail.com

| | |
|---|---|
| **From:** | Anne Marie Benfatto |
| **To:** | Anne Marie Benfatto |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Wednesday, September 16, 2020 9:03:41 AM |
| **Attachments:** | SI Letter 9-16-20.pdf |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Attached please find my letter asking for you to decline the proposed Nighttime Lighting Project at Saint Ignatius High School.

Please feel free to contact me at the above email address or at 415-697-9150.

Thank you for your consideration.

Best regards,
Dr. Anne Marie Benfatto

2179 40th Avenue
San Francisco, CA 94116
September 16, 2020

I am writing to ask you to reconsider your approval of Saint Ignatius High School's plan to install lights for nighttime activities for more than **150 nights** per year.

I have lived in my home for the last 36 years. I am a taxpayer and I have voted in every election since moving here. When I first moved in, there was little impact by SI on our neighborhood. Over the years, they have expanded their physical footprint as well as the size of their student body. Over time it has become very clear that the students, parents and administration have had less respect and less regard for our neighborhood. This is not a new problem. Due to neighborhood complaints, a few years ago SI instituted a Good Neighbor Initiative. We have seen little to no change in the behavior of the SI community since then. Things have only become worse.

I am very concerned about the installation of permanent nine-story stadium lights that will be used for nighttime activities more than 150 nights per year. Not only will SI be using the space for their student activities, but they will be renting the space to their affiliates. Using the reasoning of "student benefit" they have turned this into a business for their financial gain. There is no public value only public nuisance. Our family neighborhood is being directly and adversely impacted.

As Sunset residents and voters we should have a say in projects that will affect the quality of life in our neighborhood. The majority of SI students don't live in the Sunset. Only 60% of their students even live in San Francisco. How can any private institution in good conscience be allowed to have such a large impact on so many families?

Street parking has been an issue for years. I cannot count the number of times that my driveway has been blocked. One morning I told a student that he was blocking my driveway. He said that he was late for school, that he didn't have time to move his car and just walked away. Not only is this a problem in the daytime, but it is also a problem when SI hosts night events. Students, parents and spectators double park and block our driveways with no regard for the inconvenience they have caused to the people living in the neighborhood. With SI's proposal to host more than 150 nighttime activities a year, this will be a problem day and night, many days a year.

Noise is also a big problem during their outdoor activities. The loudspeaker, the horns, the whistles and the crowds can easily be heard in my home. It is not possible to have a quiet conversation in my own living room. If this were happening over 150 nights a year until 9PM or 10PM, this is totally unacceptable. Often at the end of the games, people going to their cars have been very noisy and sometimes very disruptive. They leave trash in the streets or in our yards. I have seen students driving recklessly, speeding and running stop signs.

The fact that SI is located in a residential neighborhood is a unique situation. It is not the norm in San Francisco to have multiple blocks of residences within one hundred feet of high-use school sports fields. No other high school in San Francisco has night games at their home fields. It is an unreasonable expectation for SI to expect their neighbors to give up their peace and quiet **in their own homes** so that their students can play sports at night. They are not acting as good neighbors, but as an institution that has no regard for the good of the community.

The biggest question that I have is "Given the circumstances, would you want your home to be located next to Saint Ignatius?" If the answer is "no", how can you ask us to live with this situation? Please vote to stop this project.

Sincerely,
Dr. Anne Marie Benfatto

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|---|---|
| **From:** | Gennadiy Galerkin |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | President Norman Yee and Members of the San Francisco Board of Supervisors City Hall 1 Dr. Carlton B. Goodlett Place, Room 244 San Francisco, CA 94102-4689 Re: File No. 200992 and 200996 |
| **Date:** | Wednesday, September 16, 2020 8:23:55 AM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi All,
My name is Gennadiy Galerkin and our family has been living in Sunset district for over 20 years. My older son graduated from SI in 2011 and my daughter will be a senior next year.
I'm writing in strong support for the approval of lights at St. Ignatius Field in order to create more options for student-athletes and also to allow St. Ignatius to implement a later start time in accordance with CA State law.
There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the campus rather than traveling great distances to practice.
St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and get good grades but to be in service to others. Many of those lessons are learned through the shared experience on the field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.
Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.
Sincerely,
Gennadiy Galerkin

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|---|---|
| **From:** | Marina Baumann |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Wednesday, September 16, 2020 1:57:45 AM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Mar and Members of the SF Board of Supervisors,

My family home is in the Sunset District near St. Ignatius College Preparatory.

I am strongly opposed to the St. Ignatius plan to light their main field and hold 150 or more-night events. Th3 field is not surrounded by public lands like Balboa Park, nor a parkland like Beach Chalet fields is surrounded by GGP and Ocean Beach. The field they want to illuminate to a professional level and utilize into the night is bounded by my residential family neighborhood - it is closely bordered by the homes in which we live.

This RESIDENTIAL district has multiple recreation fields, public schools, gardens, and one PRIVATE high school. Residents can come home and park their cara near their home. The neighborhood is clean and it safe. Nights are quiet. The Sunset District is very family oriented.

Now, St Ignatius, serving students only of which 60% live in San Francisco and only a small percent of that in the Sunset, wants to turn our residential family neighborhood into their private sports event center.

They want 90-foot-tall light standards with huge light arrays in a residential neighborhood with single family, 2 story houses, and height limits. These night events will overrun the neighborhood with cars, double parking, reckless driving at times, bringing teens and adults from beyond the city and the neighborhood, which creates noise at high levels, leaves behind trash on property and on public streets/sidewalks. They want to do all this for 150 or more nights a year.

No other high school in the City does this.
Beyond all of the resulting disruption and disregard for Sunset residents will be the construction trucks, supplies, noise and dirt,and more.

We have **direct** experience when St. Ignatius has rented night lights in the past and are very much aware of the impacts (noise, traffic, parking problems, late night drinking, etc.)  due to their night events.

Please, as a representative of the residents of San Francisco, please stop the SI project to light and use their football field at Rivera St and 39th Avenue 150+ nights

per year.
Please keep the Sunset District a residential family neighborhood.

Thank you.

Marina Baumann

| | |
|---|---|
| **From:** | Shirley Yee |
| **To:** | Board of Supervisors, (BOS) |
| **Cc:** | sisunset neighbors |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Ave CUA#2018-012648 |
| **Date:** | Tuesday, September 15, 2020 11:57:08 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Board of Supervisors,

My name is Shirley and I live with my husband and two kids in the Sunset District across the street from St. Ignatius High School's (SI) football field. I support the SI Neighborhood Association appeals against the proposed Saint Ignatius Permanent Stadium Lights.

SI's proposal to install four (4) 90-ft. permanent stadium lights in their football field will directly and negatively impact our quality of life. Not only will their illumination shine into our homes, but the noise from the night games will be intrusive. Our two elementary school-aged children have early bedtimes, well before most of the night activities planned for the stadium lights will end.

Such lights have no place in a residential neighborhood. They will rise more than three times the height of standard street lights and almost five times the height of most of the single-family homes in the area. Besides the noise and light pollution issues, the lights themselves will be an eyesore.

On April 29, 2020, SI held a virtual meeting required by the Planning Department. As the Verizon representative said during the virtual meeting, there is no reason the Verizon antenna needs to be installed on the proposed 90-ft. stadium lights. Verizon's equipment installation project should be kept separate from the stadium lights installation.

It's obvious the stadium lights are important to SI to attract students. Any benefits accrue to SI only, not the neighborhood. In fact, the noise and traffic generated by the events held at the school will be disruptive to the lives of our community. SI should have never received a Categorical Exemption in their CEQA determination as the use of the football field at the school will change with the addition of the stadium lights.

We bought our house knowing there would games and school events at SI and the nearby athletic fields. But those events don't extend into the late evenings or occur 150 nights a year! During the nights when SI held night time football games on their field, we could barely hear our television show. The installation of the lights would mean the end of our quiet evenings.

**I ask for your help in stopping SI from installing the proposed stadium lights** and would be happy to discuss our concerns with you. Thank you for your consideration.

Sincerely,

Shirley

**From:** Maria Conigliaro- O"Brien
**To:** Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com
**Subject:** Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648
**Date:** Tuesday, September 15, 2020 11:12:43 PM

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September 2020

Dear Mr. Mar and Members of the SF Board of Supervisors,

We live in the Sunset District directly across from St. Ignatius College Preparatory School in a home that has been occupied by our family since the 1940's. We recently had a daughter and she is the 3rd generation to grow up in this home.

We are strongly opposed to St. Ignatius' plan to light their main field and hold 150 or more-night events. With a small child at home that goes to bed early, the sound and crowds the events will host are not conducive to our lifestyle.

I'm sure you are aware that the SI fields are not surrounded by public lands like Balboa Park or Beach Chalet fields. Instead, it is surrounded by families and homes. People who require a natural and peaceful environment free from disruptive sounds and lights. It's imperative we keep it this way for our mental health.

Below are some notes collected by the community that I stand behind. I would love to see the city and it's representatives take this seriously.

"They want 90-foot-tall light standards with huge light arrays in a residential neighborhood with single family, 2 story houses, and height limits.
These night events will overrun our neighborhood with cars parking, double parking, sometimes reckless driving, all bringing teens and adults from beyond our neighborhood and even beyond San Francisco (since 40% of their private population is from outside the City) to SI -- taking up residential parking space, making noise at high levels and disrupting family time in our homes, leaving behind garbage & trash on our property, and on public streets/sidewalks.
They want to do all this for 150 or more nights a year.

No other high school in the City does this. No other school is having a problem scheduling all of their teams without night events.
No public school is determined to make a profit by renting private event space to "affiliates" by linking these other private institutions to themselves by assigning an employee to work for both.
Beyond all of the resulting disruption and disregard for Sunset residents will be the

construction trucks, supplies, noise and dirt, shaking due to pilings, and more.

We have direct experience when St. Ignatius has rented night lights in the past and are very much aware of the impacts (noise, traffic, parking problems, late night drinking, etc.)  due to their night events."

Please, as representatives of the residents of San Francisco, please stop the SI project to light and use their football field at Rivera St and 39th Avenue 150+ nights per year.
Please keep the Sunset District a residential family neighborhood.

Thank you
Kris and Maria O'Brien

| | |
|---|---|
| **From:** | Gina Ramirez |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS) |
| **Subject:** | Re: File No. 200992 and 200996 - Lights at St. Ignatius Field |
| **Date:** | Tuesday, September 15, 2020 10:47:55 PM |

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September 15, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Dear Commissioners:

My name is Georgina R Ramirez, I live in the Sunset District in San Francisco. My son, George Ramirez, attends St. Ignatius, he will be a Sophomore and plays Football. As a parent I'm extremely in favor of getting the field lights in support of students athletes and their right to have a well equipped campus to practice and play in all seasons of the year.

I'm writing in strong support for approval of lights at St.Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.

There are fewer spaces for students to practice field sports in San Francisco and allowing S.I. to build these lights will keep students closer to the campus rather than traveling great distances to practice.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and get good grades but to be in service to others. Many of those lessons are learned through the shared experience on the field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,
Georgina R Ramirez
Parent

**From:** Mairead Fitz-Brey
**To:** Peskin, Aaron (BOS); Safai, Ahsha (BOS); Gordan.Mar@sfgov.org; Ronen, Hillary; Haney, Matt (BOS); Fewer, Sandra (BOS); Walton, Shamann (BOS); Board of Supervisors, (BOS); Stefani, Catherine (BOS); catherine.stephani@sfgov.org; dean.preston@sf.gov; MandelmanStaff, [BOS]; sisunsetneighors@hotmail.com
**Subject:** Appeal of CEQA Exemption Determination and Conditional Use Authorization-Proposed Project-2001 37th Avenue
**Date:** Tuesday, September 15, 2020 10:38:33 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Mar and Members of the SF Board of Supervisors,

I am a junior at RA SOTA High School in San Francisco. I live directly across the street from Saint Ignatius High School. My bedroom window faces their football field, and I would be directly affected by their 90 foot light towers and late night games and practices. I normally need to get up early to catch the 48 Quintara bus to get to school in the morning. (Hopefully I will be doing that again after Covid!). Their night time practices and games will seriously negatively impact my sleep and overall schedule.

I am a violinist and have to practice my art as well as do my homework and get to bed at a reasonable hour in order to be ready for school the next day. I understand that SI students have many sports programs, but why do they need to be practicing late at night? My parents told me that they will have a later start time than public school students, but that doesn't mean they should be able to disregard the needs of the other students in the area who don't get the option to start school later. I have friends who play sports (soccer and football) at Lincoln, Washington, and Lowell High Schools and they don't have night-time practices. They are still able to compete and play. Is SI somehow special because they are a private school? I don't think that's fair that they get something no other high school student has in this city.

I am against the St. Ignatius plan to light their main field and hold 150 or more-night events. Their field is private and is surrounded by houses. I play soccer too, and I would not be able to use their lighted field as it is only for SI students. I have practiced at the Polo Fields and Beach Chalet (which is lighted), but those fields are public, surrounded by Golden Gate Park. SI is neither public nor surrounded by Golden Gate Park

I like my neighborhood. My parents rent our house, and I feel lucky to live here. It's always been a quiet neighborhood, but if SI is allowed to have big night-time games and late-night practices, that will change. It won't be a good kind of change. SI always used Kezar Stadium for a lot of their games. They should still do so. I don't want all the noise, light, and traffic issues outside my window 150 nights a year.

Honestly, SI has a bad reputation with the students I know. It has a racist reputation, and many of my friends from middle school (AP Giannini) who went to private high schools didn't want to go there for that reason.

Please consider the other students here (who attend public school) besides the "needs" of the SI student athletes and vote no on this project.

Thank you,
Mairead Fitzsimons-Brey
2831 Rivera Street

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|---|---|
| **From:** | Connor Grant |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Tuesday, September 15, 2020 8:20:33 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the San Francisco Board of Supervisors,

I am a resident of the Sunset District and a neighbor of Saint Ignatius College Preparatory School. I have lived here for 28 years and went through the public school system in the city. Upgraded facilities can be a boon to students but the proposed 90 foot tall light poles are both superfluous and a detriment to the entire community around the school. Sporting events at SI are already crowded and incredibly loud. The announcer and scoreboard echo through the backyards of my block. Currently these issues are reserved for early afternoons and weekends but the lights would make it a constant issue. As a construction worker who needs to wake up by 5am, late night disturbances may also inhibit me, and others like me, from getting adequate sleep.

As an avid soccer player and former NCAA athlete, I understand the value of fields and access to sports. I spent countless hours on the fields of West Sunset playground, directly adjacent to the Saint Ignatius field in question. Unlike these public spaces, the SI field will not benefit the local community at all and will only be accessible for a small minority of kids, many of whom do not even live in San Francisco. The additional light and noise pollution means nothing to these transient populations, but it will have a severe impact on every resident in the area.

Sincerely,
Connor Grant

| | |
|---|---|
| **From:** | Paula Katz |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Subject:** | Please Support Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Tuesday, September 15, 2020 6:38:32 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Gordon Mar and Members of the San Francisco Board of Supervisors,

I urge all of you to vote to support the appeal to stop the St. Ignatius (SI) project to light and use their football field at Rivera Street and 39th Avenue for 150+ nights per year. Supervisor Mar, I urge you, as our District 4 representative, to strongly support our efforts and to encourage your colleagues to join you. I urge the other supervisors to also support the appeal. If this plan is approved in District 4, it could encourage high schools in other districts to do the same thing, with potential harm to your constituents.

I live in the Sunset District at 44th and Rivera, five blocks from St. Ignatius. I am one of many Sunset residents and taxpayers who strongly opposes SI's plan to light their main field and hold 150 or more events at night. The SI field is not surrounded by public lands like Balboa Park, nor a parkland, like the Beach Chalet fields, which is surrounded by the GGP and Ocean Beach. Rather, the field they want to illuminate to a professional level and utilize into the night is bounded by a residential family neighborhood, and it is closely bordered by the homes in which many families live.

As you know, the Sunset District always has been very family oriented, and most nights are quiet. Now, St Ignatius, serving students of which only about 60% live in San Francisco and only a small percent of that in the Sunset, wants to turn this residential family neighborhood into its private sports event center, to the detriment of our residential community.

St. Ignatius wants to install 90-foot-tall light standards with huge light arrays in a residential neighborhood with single family, 2-story houses, and height limits. These night events will overrun this neighborhood with cars parking, double parking, sometimes reckless driving, all bringing teens and adults to SI from beyond this neighborhood and even beyond San Francisco (since 40% of their private population is from outside the City) -- taking up residential parking spaces, making noise at high levels and disrupting family time in neighbors' homes, and leaving behind garbage and trash on residents' properties, as well as on public streets and sidewalks. The community has experienced the noise, traffic, parking problems, late night drinking, etc. in the past when SI has rented night lights for its night events. SI now wants to do all this for 150 or more nights a year.

Yet,

- No other high school in San Francisco does this.
- No other school is having a problem scheduling all of their teams without

night events.

- St. Ignatius doesn't need such night events either, especially not at such a disruption to the community.

Please oppose St. Ignatius' plans and grant the appeal, and keep the Sunset District a residential family neighborhood.

Thank you.

Paula Katz
2233 44th Avenue
SF, CA  94116

| | |
|---|---|
| **From:** | Marlene Mares |
| **To:** | Board of Supervisors, (BOS) |
| **Cc:** | Larry Mazzola Jr. |
| **Subject:** | Support Letter re: Lights at St. Ignatius Field |
| **Date:** | Tuesday, September 15, 2020 2:56:02 PM |
| **Attachments:** | Support Ltr-St Ignatius Field.pdf |
| **Importance:** | High |

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Good Afternoon,
Please see attachment.

Thank you!

Regards,

Marlene Mares
Office Mgr/Admin Assistant
UA Local Union 38-Plumbers
**415.626.2000 (main line) 415.626.2009 (fax)**
**415.558.3701 (direct line)**
mmares@ualocal38.org

TELEPHONE (415) 626-2000

FACSIMILE (415) 626-2009
EMAIL: UALOCAL38@UALOCAL38.ORG

UNITED ASSOCIATION OF JOURNEYMEN AND APPRENTICES
OF THE PLUMBING AND PIPE FITTING INDUSTRY

LOCAL UNION NO. 38

1621 MARKET STREET • SAN FRANCISCO, CA 94103

September 15, 2020

President Norman Yee
and Board of Supervisors
San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

**VIA EMAIL**

Re: Lights at St. Ignatius Field

Dear President Norman Yee & Board of Supervisors:

On behalf of Plumbers & Pipefitters Local Union 38 as well as living in the City of San Francisco, I represent more than 2500 workers in San Francisco.

I'm writing in strong support for approval of lights at St. Ignatius Field in order to create more options for student athletes and also to allow St. Ignatius to implement a later start time in accordance to CA State law.

St. Ignatius College Preparatory is one of the oldest schools in San Francisco and has been a partner in the education of generations of San Franciscans. Students are required to give 100 hours of community service in order to graduate and most of those hours are spent helping the most vulnerable populations of San Francisco.

St. Ignatius College Preparatory has also been a great partner for signatory union contractors, making sure that the men and women who work to improve their school are paid proper wages, health, and welfare benefits.

I think that this project is a win-win for San Francisco's students, and all done with private financing. The 5G wireless antenna is another benefit for the area, especially in the event of an emergency for San Francisco to use for essential communications.

I understand that they have performed all the required steps necessary for the Planning Department to support their project and they have my support as well.

St. Ignatius College Preparatory has been an excellent center of learning not just to take tests and get good grades but to be in service to others. Many of those lessons are learned through the shared experience on the field. Even the students who participate as spectators gain a strong feeling of community by supporting their friends and fellow classmates.

Please vote YES! to the lights at St. Ignatius Field and thank you for your consideration.

Sincerely,

LARRY MAZZOLA, JR.
Bus.Mgr. & Fin.Secty-Treas.

| | |
|---|---|
| **From:** | Matthew |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Tuesday, September 15, 2020 2:51:40 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear, Gordon Mar and members of the SF Board of Supervisors,

I live the Sunset and directly across the street and feet away from St. Ignatius College Preparatory. I work in downtown San Francisco. I am a taxpayer and voter.

I am opposed to the St. Ignatius plan to light their football field and them holding more than 150 night events. Please vote no to the installation of the lights. In the alternative, I am asking you to require SI to have to do an independent environmental study, light study, noise study, and a parking study (that includes all of their facilities since it has never been done). The same types of studies that are ordinarily required for these types of projects. Let's not show favoritism to a private school.

Let me make clear, the addition of the lights is not for the benefit of the students. It is commercial opportunity and should be viewed as such. St. Ignatius actively advertises the rental of their field and facilities. On average has rented out the football field to non-students about two days a week with a whole day rental typically occurring on Saturday or Sunday. Moving some student activities to nights, would allow them to rent their field more. St. Ignatius has refused to limit their use of the football field to only student activities and wants to continue (and expand) their rentals to non-students.

No other high school in the City has lights on their football field. No other school is having a problem scheduling all of their teams practice and games time without night events. Plus, allowing a private school to build lights on their field sends the wrong message to the community. When almost every other public school in the city would prove to be a better alternative to the addition of lights due to many of them not being feet away from residential homes or actually being in stadiums

In short, the suggested site for the lights is the worse location in the City.

It is important to remember that St. Ignatius choose to build in residential area. Homes that have been here for over 80 years. St. Ignatius choose to build the football field next to the homes instead of building the field next to Sunset Blvd surrounded by their buildings. The field is not surrounded by public lands like Balboa Park, nor a parkland like Beach Chalet fields is surrounded by GGP and Ocean Beach. The field they want to illuminate to a professional level and utilize into the night is mere feet away for my house and other residential families. It is not a stadium, it is open field. It does not

include any barriers to reduce the noise levels or lights effects on the neighbors. The sound from the day games is deafening. Approximately 40 children under the age 12 live across from the field. That number increase to hundreds for the homes effect by the noise. These child need sleep. Having hundreds of families waited until well after 10 pm to finally put their kids to sleep is ridiculous. St. Ignatius created this issue and now they want to the neighborhood to bear burden of their poor decisions.

The 90-foot-tall light poles with huge light arrays in a residential neighborhood with single family, 2 story houses, and height limits will substantially change the neighbor and diminished our quite enjoyment of the nights in the neighborhood. These night events will overrun our neighborhood with cars parking, double parking, sometimes reckless driving, all bringing teens and adults from beyond our neighborhood and even beyond San Francisco to SI -- taking up residential parking space, making noise at high levels and disrupting family time in our homes at night, leaving behind garbage & trash on our property, and on public streets/sidewalks.

St. Ignatius has no parking to support the football field, basketball court, theater, pool, church, or school. St. Ignatius regularly schedules multiple events at the same time. Their planned additional parking would only add approximately 50 spots since the street suggested is exclusively being use by the school. This is a serious issue that has been avoided due to St. Ignatius piecemeal approach on getting it projects approved. It was a mistake to grant a permit without addressing St. Ignatius existing parking issue.

Please, as representatives of the residents of San Francisco, please stop the SI project to light and use their football field at Rivera St and 39th Avenue 150+ nights per year.
Please keep the Sunset District a residential family neighborhood.

Thank you.

Matthew

Sent from my iPhone

| | |
|---|---|
| **From:** | Mr. W. Hickox |
| **To:** | Yee, Norman (BOS); Board of Supervisors, (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Mar, Gordon (BOS); Preston, Dean (BOS); Fewer, Sandra (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Stefani, Catherine (BOS); Walton, Shamann (BOS); Ms. Nicole Harlan |
| **Subject:** | Lights at St. Ignatius College Prep. |
| **Date:** | Tuesday, September 15, 2020 1:48:49 PM |
| **Attachments:** | Field Letter.docx |

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**San Francisco Board of Supervisors**:

September 15, 2020

President Norman Yee
and Members of the San Francisco Board of Supervisors
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: File No. 200992 and 200996

My name is Rob Hickox and I am a fourth Generation San Franciscan. I have lived in the City my entire life. I have been a resident of the Sunset District for 35 years. I am an alumnus of Saint Ignatius and a parent of a Saint Ignatius grad.

I have coached in the Sunset District for over 40 years from youth to adult. Over the years I have seen the benefits of fields and especially what lighted fields bring to the City. I worked with both Jim Lucey and Quinton Kopp on getting the West Sunset field (Jim Lucey Fields) build years ago. As a youth coach at Saint Gabriel School I saw the immediate positive impact the lights had on the South Sunset field (Soccer & Baseball) for the youth of the city.

If you pass the lights, student will no longer have to stretch themselves to the point of their health and wellness. These lights will help the students manage family, school, sports and other activities. Time is a very important commodity these days and installation of these lights will benefit all.

I highly support and recommend the lights for Saint Ignatius field. I see it as a win, win for both the Sunset District and the City. Please vote YES! to the lights on the Saint Ignatius field and thank you for your time and consideration.

Sincerely

Rob Hickox
1462 – 36th Avenue
San Francisco CA 94122

| | |
|---|---|
| **From:** | Serena Llamera |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Tuesday, September 15, 2020 1:14:52 PM |

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September 15, 2020

Dear Mr. Mar and Members of the SF Board of Supervisors,

I am a San Francisco native and a Sunset/Parkside resident for 23 years. I am a SF taxpayer and a registered voter. I am writing to express my concern about the current proposed lighting project at St. Ignatius College Preparatory. St. Ignatius is a private high school in a residential neighborhood. I have been made aware that over 150 nights a year and up to 10 o'clock PM, games including football, soccer, hockey, and lacrosse will be played on the lit field with four 90 foot tall stadium lights.

My first concern is the noise from crowds and the loudspeakers since my son sleeps at 8:30 PM. I can hear very clearly every word from my house 1/2 a block away during the games. A few evening games have been played on the weekends with rented lights too. Why does it have to be so loud?

The second issue is the four 90 foot high lights which brightens the night sky through the surrounding neighborhood but also is really out of character for this neighborhood. The light can possibly reflect and disperse off fog that the Sunset is prominent for. More research should be done on this. I feel really bad for the houses directly across the street that have to bear with the bright stadium lights especially if their bedrooms face the SI field. It's going to be really tough for families with young kids who need to sleep between 7-9 PM and adults who need to wake up early to go to work.

The third issue I have is the parking and traffic that comes with the games. I have on several occasions ticketed cars blocking my driveway. I have almost had a couple cars towed if I was not able to squeeze out of my driveway. The last car was a foot into my driveway during a daytime weekend game at St. Ignatius. And, of course, this comes with occasional teens loitering and littering.

I am not proposing that St. Ignatius get rid of their sports program. SI students and alumni have had a successful sports program without late evening ball games. In fact, my son plays 5 different sports. He is able to achieve this successfully without playing in the evenings. But be reasonable. Noise, traffic, bright lights, litter, loitering, blocked driveways in the evenings in a residential neighborhood is not reasonable and infringes on my peaceful enjoyment of my home.

Please consider all these issues as if you were living in a home right next door from the St. Ignatius lighted field with evening games with crowds of cars and people.

Thank you for your consideration!

Serena Llamera
2250 39th Avenue
SF, CA 94116

Sent from my iPhone

| | |
|---|---|
| **From:** | Isabelle Hurtubise |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Cc:** | sisunset neighbors |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Tuesday, September 15, 2020 11:20:06 AM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor,

My name is Isabelle Hurtubise and I live in the Sunset District at 2171 39th Ave. I am writing AGAINST the proposed Saint Ignatius ("SI") Permanent Stadium Lights and in support of the SI Neighborhood Association appeals..

I live in the Sunset with my partner, Brendan Kenneally, and our 4 year old son, Finnegan. We bought the home in 2012 and plan to raise Finn here. We are also in the planning stage of building out our ground floor so my mother can live with us as well. So we are committed to our home, financially and personally.

Our home is directly across from the SI football field, right at the 7th yard line. One of the 90 foot posts will be directly in front of our bedroom window. The lights will be on 150 nights a year as late as 10pm, disturbing family dinnertime and my child's bedtime. I am deeply concerned how having bright lights on so late nearly every night will affect my child's learning, development and sleep. There have been no studies of the impact these lights will have on the community and its children.

It is more than just lights - the night practices and games bring teenage drivers and crowds of people to our quiet residential neighborhood. When SI has night games, parking is impossible, the crowds are loud and there is trash everywhere the next day. We generally have to keep the windows closed because of the noise during these events. Finn cannot ride his bike or play catch on the sidewalk after dinner. The next day, we pick up trash scattered through our front yard, the sidewalk and the street.

I am also concerned about the impact these enormous structures will have on the look and feel of the neighborhood. The four light banks will each be the size of two garbage dumpsters, hovering above our neighborhood. The Sunset is mostly two story homes, less than 40 feet high. These double dumpster-sized lighting banks will be on four towers reaching 90 feet high - more than twice the height of the buildings in our neighborhood. It will fundamentally change the Sunset for the worse.

Finally, we live in an area with a lot of bird life. The West Sunset fields are an enormous open area that directly border the SI football field. A lot of wild birds live and nest there, including hawks and owls. I am concerned how these lights will impact the wildlife in our area. There have been no studies on the impact of the enormous 90 foot structures and stadium lighting until 10pm on wildlife.

Perhaps most frustrating is there is no community benefit from these lights. SI is an expensive private school that already has a practice field with night lights. No public school has permanent stadium lights. I have no personal animosity towards the school - my partner Brendan is an alum and our son may go there someday. But the enormous cost to our neighborhood of these huge lights and regular nighttime crowds just isn't worth the benefit to a small group of people, nearly none of which have to live here.

The appeals are asking for a proper and complete environmental review. Even if it is determined that the lights can go up, there are numerous mitigations that can be put in place to limit the impact on our neighborhood. This is an enormous project with significant impact on hundreds of people. Even if you think it should go forward, I ask that we take the time to do it right.

Thank you for your consideration,

Isabelle Hurtubise
cell: 415.867.8173

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Isabelle Hurtubise
cell: 415.867.8173
ihurtubise@gmail.com

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|---|---|
| **From:** | Gregg |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com |
| **Cc:** | Breed, London (MYR) |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Tuesday, September 15, 2020 5:53:18 AM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mayor Breed, my supervisor Mar and Members of the SF Board of Supervisors,

I have lived in the Sunset District across from St. Ignatius College Preparatory since 1997.
I am a taxpayer, home owner and voter.
I am strongly opposed to the St. Ignatius plan to light their main field and hold 150 or more-night events. That field is not surrounded by public lands like Balboa Park, nor a parkland like Beach Chalet fields is surrounded by GGP and Ocean Beach. The field they want to illuminate to a professional level and utilize into the night is bounded by my residential family neighborhood - it is closely bordered by the homes that SF tax paying families live in.

I have enjoyed raising my family of 4 great girls on 36th Ave. The lighting project will dramatically effect my family's home life. Over the years SI has put in temporary lights which shine directly into my home, casting shadows throughout the living room, dining room and kitchen. All the areas where we are together as a family. We are unable to even look towards the front of our home without being blinded. (I will attach pictures)

St Ignatius has been increasing in size over the years. When I grew up it was a private boys school the served almost 100 % city kids and most of them lived in the Sunset. Now it is a coed School serving about 50% city kids with only a small percent of that from the Sunset. SI wants to turn our residential family neighborhood into their private sports event center for kids from other cities who can afford 25k a year tuition.

They want 90-foot-tall light standards with huge light arrays in a residential neighborhood with single family, 2 story houses, and height limits.

No other high school in the City does this. No other school is having a problem scheduling all of their teams without night events.
No public school is determined to make a profit by renting private event space.

They already have a practice field with lights that I just found out they are only

allowed to keep the lights on until 7:30.
You think I would known this since it's directly across from my house. I didn't know about the 7:30 limit as the lights are on regularly past 8 or later. Sometimes with no one using the field or club teams that rented the field. Just lights on shining into my house. I regularly call SI about it. I don't trust them to follow the time limits or number of events as they agreed with the planning commission. They will just get it passed and do what they want.

There is no public use for what they are doing. Even if they did agree to public use they would just stop it as they did with the swimming pool they asked the community for permission to build. They agreed to several hours a week where the public could use pay to use the pool. That didn't last too long as they stopped it because they make more money renting then pool out to private club swimming teams.

Please, as representatives of the residents of San Francisco, please stop the SI project to light and use their football field at Rivera St and 39th Avenue 150+ nights per year.
Please keep the Sunset District a residential family neighborhood.

Thank you.

Gregg Montarano
2146-36th Ave

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|---|---|
| **From:** | rent rent |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Peskin, Aaron (BOS); Walton, Shamann (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Cc:** | sisunsetneighbors@hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Monday, September 14, 2020 9:23:29 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the SF Board of Supervisors,

My name is Karen Ho and I live in the Sunset District at 2127 40th Ave, SF, and I support the SI Neighborhood Association appeals against the proposed Saint Ignatius Permanent Stadium Lights

This is a quiet, residential neighborhood with our single-family homes surrounding the school. When they hold night games with portable lights, those can be seen for many blocks around and there are announcers on loudspeakers with crowds of one or two thousand people. All these people come with cars, noise and garbage. Luckily these events only happen several times a year and this is tolerable.

School events and sports are a normal part of any education program -- within reason. Glaring night lights on 90' poles for almost half the year across the street from single family homes is not reasonable for us or perhaps even their students. Making them have sports practice until 9pm almost every school night seems too much.

In addition, parking is always a problem in San Francisco, the game will create more people to come in this neighborhood which will affect the parking space in my home area also. As of now, the SI students already park their car overnight in front of my house, I cannot imagine after they have evening games, they will occupy our street parking more often and for longer hours.

The lights will provide the school with the increased prestige it desires but that is not worth changing and disturbing the lives of the whole neighborhood.

The public cannot use this field but will be the ones to suffer if the lights go up.

Please prevent the completion of this project. The quality of life in this neighborhood depends on your action.

Sincerely,

Karen Ho

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|---|---|
| **From:** | Coral Ho |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Cc:** | sisunset neighbors |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Monday, September 14, 2020 9:13:12 PM |

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Dear Members of the SF Board of Supervisors,

My name is Coral Ho and I live in the Sunset District at 2146 40th Ave, SF and I support the SI Neighborhood Association appeals against the proposed Saint Ignatius Permanent Stadium Lights

As you know, SI is proposing permanent 90ft tall lights that will be in use 150 nights a year. In the past when the school rented lights, we experienced very loud noise, increased traffic, parking problems, late night parties and cheering.

SI has not been very open about their proposal and would not listen to our concerns about how this will severely impact our evenings.

I listened to the SF Commissioners meeting the the SI Principal argued that High Schoolers need quality of sleep so they want to start school day late and thus need to extend after school practice till evening. But the late school start is only 45 minutes later and now they want to push their students to play and practice sports until 9m almost every school night.

How about our young kids? I have two young children and they have to go to bed before these lights and the noise will be turned off -they have to wake up early to get to school before 8am. Is their quality of sleep not important? Especially their bedroom is facing the football field.

No other high schools (public or private) in SF have lighting and there's no reason to start such a trend. There are other fields available for special events or final matches that could be used. Or, Saint Ignatius should continue to utilize rental lights for limited events or special games.

Please support our appeal against the SI Stadium Lights

Sincerely,

Coral Ho

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|---|---|
| **From:** | Brendan Kenneally |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunset neighbors |
| **Subject:** | Appeal of CEQA Exemption Determination andConditional Use Authorization - Proposed Project - 2001-37th Avenue CUA#2018-012648 |
| **Date:** | Monday, September 14, 2020 9:08:38 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello.

My name is Brendan Kenneally and I live in the Sunset District at 2171 39th Ave, SF CA 94116 and I support the SI Neighborhood Association appeals against the proposed Saint Ignatius Permanent Stadium Lights.

I am opposed to the proposed lighting as it will fundamentally change the way of living for the neighborhood that surrounds St. Ignatius College Preparatory.

I want to be clear that I am not anti-sports nor anti-St. Ignatius. In fact I am an SI graduate class of 1987.

I moved to 39th Ave. fully aware I was moving across the street from a highschool with a student population of 1400. I purchased my home in March of 2010 for several reasons, but the two most relevant for this issue are the following:

- It is a safe location
- It is a quiet location

By allowing the lighting project to move forward, it will impact both of the reasons listed above.

The lightning will mean increased traffic for games with medium to large attendance as well as additional crowds who are not familiar with the area and would be an increased danger to the pedestrians surrounding the school.

I personally have witnessed 'tailgating' (drinking) by both adults and students prior to Friday/Saturday night football games when there has been temporary lighting in the past. Also, with past night games at St. Ignatius, there has been reckless driving from teens and adults per and post games. (speeding up and down the streets, especially on Rivera as well as 39th Ave, on the west side of the school). Having permanent lighting fixtures will increase the likelihood of an accident as there will be several sports and nighttime activities (alumni events) using the field. Simply stated, more use of the field equals more risk.

It also would mean increased trash left after games by attendees. Which we already

have to deal with without the addition of nighttime games and practices.

Also, the addition of permanent lighting will also mean a disruption to the neighbors and residents surrounding the school. Currently, during a normal school year neighbors are used to the parking issues and increased traffic during the school day as well as the noise from practices that take place after school. There are already over 100+ days of practices between the major outdoor sports (football, lacrosse, soccer and track and field) in addition to the non St. Ignatius club teams that are hosted there. (both girls and boys sports) There is constant noise coming from the practices and games - yelling from players, coaches and fans, amplified music, loudspeakers, whistles, pounding on stadium bleachers This carries late into the evening during the school year.

By allowing the installation of permanent lighting, you are asking the neighbors to endure the additional burden of increased noise, traffic and disruption to our daily lives all for the sole benefit to the students of St. Ignatius. We already have to deal with blocked driveways, increased traffic and blocked streets from double parked parents picking up their children - please ask MUNI about the blocked streets on the 48 line bus route, noise from games and practices, trash (from both students and parents). And now you want to exacerbate the problem by allowing practices to extend into the nighttime hours as well as the addition of night games. The neighborhood is clean and safe.

There are NO guarantees from St. Ignatius on the number of nighttime games and practices - the permit only calls for lights to be on 'no more than 150 nights per year up to 10 PM'. The school year is approximately 220 days per year, and approving this project would allow for lighting for ~ 70% of the school year.

The disruption to the neighbors lives would be immense. It's already hard enough trying to have family dinners, discussions and getting my four year old son to bed. Now you are asking us to take on the additional burden of having sports and alumni activities in the evenings when the neighbors are trying to have family time after working all day. The school states the lights are necessary to allow students to participate in sports and academics, and it is for the benefit of the teenage brain. Please ask yourself how additional light and noise will impact my 4 yer old child's ability to sleep, study and develop his brain.

The installation of 90 foot light poles each with a lighting fixture the size of a small dumpster at the top of the light poles does not fit with the current aesthetic of the Sunset district of San Francisco.  It is a neighborhood of single family two-sotry homes.

It's not only about the lights.  It's about how 150 nights a year of sports activities which will affect and disrupt our neighborhood evenings. Please keep in mind the school dances, basketball games, pre-teen club teams, musicals, dance performances, alumni and fundraising events that already take place, pushing the number of nights neighbors would be impacted close to 200.

I feel that approving the lights sets a dangerous precedent for all San Francisco residents. No other high school in SF has the need for permanent night time stadium lights. Other schools are able to balance their sports programs along with their regular academics.

The project has NO public value. It is purely for the benefit of St. Ignatius and it's students. There is no benefit to the surrounding neighborhood. It will directly have an impact on the quality of living for the surrounding neighborhood. This is NOT A NEED, but IT IS A WANT for St. Ignatius. They stated in a face to face meeting that the lights are a marketing tool to attract athletes to the school.

I implore the planning commission to please deny the permit for permanent lighting at St. Ignatius.

Thank you for your time and attention.

Brendan Kenneally

--
*Brendan Kenneally*
*Manager, Promotional Free Goods*
*Cell: (650) 255-8251*

**From:** Anna
**To:** Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com
**Subject:** ST. IGNATIUS LIGHT PROJECT - OPPOSED
**Date:** Monday, September 14, 2020 7:13:09 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

September, 2020

Dear Mr. Mar and Members of the SF Board of Supervisors,

I live in the Sunset District across from St. Ignatius College Preparatory.
I am a taxpayer and a voter.
I STRONGLY oppose the St. Ignatius plan to light their main field and hold 150 or more-night events.

**My car has been hit by one of these entitled narcissistic students.**
**There are times when I have been unable to find parking within 6 blocks of my home.**
**I've borrowed my neighbor's driveway and been BLOCKED so I could not get out.**

There is already a parking problem and now they want to take my right to a quiet restful night?
I HAVE BEEN RAISED IN THIS RESIDENTIAL district aware of the multiple recreation fields, public schools, gardens, and one PRIVATE high school. I could come home and park my car near my home if not directly in front of my home. The neighborhood was clean and it was safe. Nights were quiet. The Sunset District was very family oriented.

Now, St Ignatius, serving students only of which 60% live in San Francisco and only a small percent of that in the Sunset, wants to turn our residential family neighborhood into their private sports event center.

**THIS PROJECT DOES NOT BENEFIT THE NEIGHBORHOOD THAT IS EXPECTED TO SUPPORT THIS. IT IS NOT A PUBLIC PROJECT. THE GROUNDS ARE NOT ACCESSIBLE TO THE NEIGHBORHOOD. I WENT TO ABRAHAM LINCOLN. A PUBLIC SCHOOL. ANY BENEFITS SHOULD GO TO THAT HIGH SCHOOL. NOT AN ELITIST UN-INCLUSIVE PRIVATE SCHOOL.**

**HOW SUPPORTING A PRIVATE SCHOOL FAIR TO A THE NEIGHBORHOOD? IT'S NOT.**

They want 90-foot-tall light standards with huge light arrays in a residential neighborhood with single family, 2 story houses, and height limits.
These night events will overrun our neighborhood with cars parking, double parking, sometimes reckless driving, all bringing teens and adults from beyond our neighborhood and even beyond San Francisco (since 40% of their private population is from outside the City) to SI -- taking up residential parking space, making noise at high levels and disrupting family time in our homes, leaving behind garbage & trash on our property, and on public streets/sidewalks. They want to do all this for 150 or more nights a year.

That field is not surrounded by public lands like Balboa Park, nor a parkland like Beach Chalet fields is surrounded by GGP and Ocean Beach.
The field they want to illuminate to a professional level and utilize into the night is bounded by my residential family neighborhood - it is closely bordered by the homes in which we live.

No other high school in the City does this. No other school is having a problem scheduling all of their teams without night events.
No public school is determined to make a profit by renting private event space to "affiliates" by linking these other private institutions to themselves by assigning an employee to work for both.
Beyond all of the resulting disruption and disregard for Sunset residents will be the construction trucks, supplies, noise and dirt, shaking due to pilings, and more.

We have direct experience when St. Ignatius has rented night lights in the past and are very much aware of the impacts (noise, traffic, parking problems, late night drinking, etc.) due to their night events.

**THEY ARE LYING WHEN THEY SAY THERE IS NO IMPACT TO THE TRAFFIC FLOW. IT'S ALREADY A PROBLEM.**
**THE CORNER OF SUNSET AND QUINTARA HAS MANY ACCIDENTS. MANY.**

**PLEASE, WITH ALL DUE RESPECT, as representatives of the residents of San Francisco, please stop the SI project to light and use their football field at Rivera St and 39th Avenue 150+ nights per year. Please keep the Sunset District a residential family neighborhood.**

**Thank you,**

ANNA PADERNA
2190 36TH AVE
SF, CA

**From:** Una Fitzsimons
**To:** Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com
**Subject:** Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648
**Date:** Monday, September 14, 2020 2:09:59 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Mar and Members of the Board of Supervisors,

I am writing to express my disapproval of and anger at the recent decision by the SF Planning Comission to approve the four 90' field lighting arrays and cell tower project at Saint Ignatius Prep. High School.

I would ask you to consider the impact this project will have on the neighborhood/community. This is a residential area. I live across the street from Saint Ignatius, and their athletic programs normally run until 7-7:30 pm during the week, and on the weekends they usually have athletic events (many of these not involving SI teams) on Saturdays and Sundays most of the day. Their desire to shift their athletic practices and games to the evenings (with the addition of four 90' light towers) in many cases, lasting until 10 pm would have very negative effects for the neighborhood. Presently, we have to deal with parking, noise and traffic during the day and early evenings and the weekends. Now, SI wants to continue their sports programs until 9 or 10 pm at least 150 nights a year. To me, this comes down to a simple issue of **privatized gains and socialized costs**. **The only people who benefit from this project are Saint Ignatius (a private school with $39 million in sales/tuition and reduced property taxes) and the students of SI, 40% of whom reside outside the city. Who loses? We do, the neighborhood, due to light pollution, traffic and noise (especially during big games), and parking issues**. The Planning Commission seemed to only consider how good the sports program would be for SI students and didn't consider their role as a public entity to protect the commons or public good. No one is against high school sports, but no other high school in the city has night time lights. Only SI students and "affiliate teams" will be allowed to use the lighted field. Affiliate teams using the field in the past include SF Elite Academy Soccer Club as well as private lacrosse teams (the names of which I cannot remember). We, the neighbors, will have to deal with all the negative effects of this project (mentioned above). We get no upside. That is not right, and the planning commission decision favors the needs of a private entity over the very real concerns of a public neighborhood. During the Planning Commission meeting SI "promised" to dim the lights at 8:30 pm, but we have no way to hold SI accountable (for anything). You really think they are going to dim the lights during a football game? The planning commission didn't practice good due diligence.

During the planning commission meeting, the SI principal promised that no games or event would have more than 1,000 attendees. She cannot know or guarantee that. Their big football games bring in a minimum of 2,000 people according to their own records! She lied to the commission in order to get this approved. *Where are the traffic, parking, noise and light studies for these night-time events? Why didn't SI show attendance records for their last major sports events so that we could have a reasonable estimate of crowd size and impact?* In

fact, SI can only promise to try and reduce the many problems that it acknowledges that this project will create for the neighborhood. **This decision reeks of private privilege for the few and tough love for the rest of us. This feels like the worst kind of politics, one that benefits the rich and connected at the expense of the rest of us.**

Please stop SI from exercising their privilege at the expense of this neighborhood. **I noticed during our first zoom meeting regarding this project, that SI's leadership consists of exclusively white men, with one white woman there for good measure! During this meeting, they never let us speak or ask any questions. They did not answer any questions either. They hide behind this performative notion of being a good neighbor, but never actually listen or communicate with their neighbors in a meaningful way, other than to dictate to us what they are doing. That is not a good neighbor.** They need to figure out how to make their sports programs work ***without*** the addition of lights. Every other high school in the city does. Why should they get an exemption that externalizes the costs to the community?

I urge you to reject this project. Saint Ignatius should not get special treatment because they are a connected, wealthy, private school.

Sincerely,
Una Fitzsimons
2831 Rivera St

| | |
|---|---|
| **From:** | timothy brey |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunset neighbors |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Monday, September 14, 2020 1:58:43 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Mar and Members of the Board of Supervisors,

I am writing to express my disapproval of and anger at the recent decision by the SF Planning Comission to approve the four 90' field lighting arrays and cell tower project at Saint Ignatius Prep. High School.

I would ask you to consider the impact this project will have on the neighborhood/community. This is a residential area. I live across the street from Saint Ignatius, and their athletic programs normally run until 7-7:30 pm during the week, and on the weekends they usually have athletic events (many of these not involving SI teams) on Saturdays and Sundays most of the day. Their desire to shift their athletic practices and games to the evenings (with the addition of four 90' light towers) in many cases, lasting until 10 pm would have very negative effects for the neighborhood. Presently, we have to deal with parking, noise and traffic during the day and early evenings and the weekends. Now, SI wants to continue their sports programs until 9 or 10 pm at least 150 nights a year. To me, this comes down to a simple issue of **privatized gains and socialized costs**. **The only people who benefit from this project are Saint Ignatius (a private school with $39 million in sales/tuition and reduced property taxes) and the students of SI, 40% of whom reside outside the city. Who loses? We do, the neighborhood, due to light pollution, traffic and noise (especially during big games), and parking issues**. The Planning Commission seemed to only consider how good the sports program would be for SI students and didn't consider their role as a public entity to protect the commons or public good. No one is against high school sports, but no other high school in the city has night time lights. Only SI students and "affiliate teams" will be allowed to use the lighted field. Affiliate teams using the field in the past include SF Elite Academy Soccer Club as well as private lacrosse teams (the names of which I cannot remember). We, the neighbors, will have to deal with all the negative effects of this project (mentioned above). We get no upside. That is not right, and the planning commission decision favors the needs of a private entity over the very real concerns of a public neighborhood. During the Planning Commission meeting SI "promised" to dim the lights at 8:30 pm, but we have no way to hold SI accountable (for anything). You really think they are going to dim the lights during a football game? The planning commission didn't practice good due diligence.

During the planning commission meeting, the SI principal promised that no games or event would have more than 1,000 attendees. She cannot know or guarantee that. Their big football games bring in a minimum of 2,000 people according to their own records! She lied to the commission in order to get this approved. *Where are the traffic, parking, noise and light studies for these night-time events? Why didn't SI show attendance records for their last major sports events so that we could have a reasonable estimate of crowd size and impact?* In

fact, SI can only promise to try and reduce the many problems that it acknowledges that this project will create for the neighborhood. **This decision reeks of private privilege for the few and tough love for the rest of us. This feels like the worst kind of politics, one that benefits the rich and connected at the expense of the rest of us.**

Please stop SI from exercising their privilege at the expense of this neighborhood. **I noticed during our first zoom meeting regarding this project, that SI's leadership consists of exclusively white men, with one white woman there for good measure! During this meeting, they never let us speak or ask any questions. They did not answer any questions either. They hide behind this performative notion of being a good neighbor, but never actually listen or communicate with their neighbors in a meaningful way, other than to dictate to us what they are doing. That is not a good neighbor.** They need to figure out how to make their sports programs work ***without*** the addition of lights. Every other high school in the city does. Why should they get an exemption that externalizes the costs to the community?

I urge you to reject this project. Saint Ignatius should not get special treatment because they are a connected, wealthy, private school.

Sincerely,
Una Fitzsimons
2831 Rivera Street

| | |
|---|---|
| **From:** | Christine Crosby |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Cc:** | sisunset neighbors |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Monday, September 14, 2020 9:56:20 AM |

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Dear Board of Supervisors,
My name is Dr. Christine Crosby, and I reside on 36th Ave directly across from the practice fields of SI. I am a taxpayer and a voter. On behalf of myself and my young child, I support the SI Neighborhood Association appeals against the proposed SI permanent Stadium Lights. As I think of our eerie Martian orange sky, it's difficult not to feel overwhelmed by a sense of worry. Our human actions have caused this immense damage to our environment, health, and soon to our economy. Now is the time to make changes. We can no longer afford, in so many respects, to continue on this path of willful ignorance.
The project at 2001 37th to install permanent nighttime lighting for marketing purposes was passed without a proper Environmental Impact Report, despite being approved in a residential zone, adjacent to the largest green space under the jurisdiction of the DPW. This green space has been identified by the DPW as a major (and only in SF) migratory pathway for pollinators and many species of birds. As you may have heard, our pollinators are in great danger, threatening the future of agriculture as we know it currently. While humans are capable of great technological advances, there is only so much we can do to adapt to this quickly changing environment. Again, I urge you not to sacrifice our tomorrows for today's status quo of monied influence. Please open your windows and see the crisis we are in today. A proper EIR should be completed to guide this project, if it is deemed to be appropriate.
Additionally, this project was approved without a lighting study that takes into account the many, many foggy evenings we experience here on the coast. The increased blue light used by these LEDs have been shown to have many negative effects. Please ensure that due diligence is done before these lights are installed. Both the SI students and the Sunset residents deserve at least that much.
Further, SI already has practice lights which were approved without neighbor notification. These are routinely left on past the permitted hours and nothing can be done to stop it. There is no enforcement of the permit conditions and SI will continue to flout the scant rules that the Planning Commission have set for these even more disruptive lights. Enforcement will be up to neighbors, but there will be no consequences, as we see now with the lights on the practice field.
The tuition fees at SI do not permit involvement by the general public and serve only to further separate the "have's" and "have not's". In 2020, recruitment into voluntary segregation cannot be more important than the health of local residents. I'm confident the city of San Francisco can do better than this. No other school in SF has these kinds of "needs", which SI plainly admitted is an "enhancement" in their limited communication with the community. On the subject of community outreach, SF Planning required a community meeting, but the only "meeting" that occurred was a virtual sales pitch with all community members muted. No second attempt was made to re-engage with the community, despite the sponsor being required to do so by SF Planning. When the time came to approve this project, somehow this

requirement was no longer a requirement.
This project does not provide any community benefit. There is no opportunity for the public to participate in anything at the SI campus, aside from purchasing tickets. Access to the pool is gone, as are community bingo nights. Year over year, SI has made clear that they are not a member of the community, but are separate from and above the community.
Finally, it is inappropriate that this permit was reviewed by Jeff Horn, who has reviewed and pushed through their other recent "improvements" including the aforementioned practice lights. No disclosures of his relationships with SI, Mr. Stupi, other administrators, or Verizon were provided when requested. Transparency and accountability are the least we can expect from our officials.
You, the Board of Supervisors, now have an opportunity to do right, to leave a positive mark on our future by ensuring that this project is properly vetted. When later generations of San Franciscans look back on this, you can be remembered as the people that stood up to monied interest and spoke for a better future. I ask that you toughtfully reconsider the SF Planning Commission's decision to approve this entirely inappropriate project. This project is not in the best interest of the residents of San Francisco.

With hope,
Christine Crosby, Ph.D.

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|---|---|
| **From:** | Allen Malmquist |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Subject:** | APPEAL OF CEQA EXEMPTION DETERMINATION AND CONDITIONAL USE AUTHORIZATION - PROPOSED PROJECT - 2001-37TH AVENUE CUA #2018-012648 |
| **Date:** | Monday, September 14, 2020 9:35:43 AM |
| **Attachments:** | PERSONAL Saint Ignatius 2.docx |

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Members of the San Francisco Board of Supervisors,

Thank you for your time and your consideration.
Please accept the enclosed attachment-letter regarding the need to disallow the above exception and construction.

Sincerely,
Allen Malmquist

September 14, 2020

San Francisco Board of Supervisors
Supervisors Gordon Mar, Catherine Stefani, Dean Preston, Matt Haney, Rafael Mandelman, Shamann Walton, Aaron Peskin, Ahsha Safai, Hillary Ronen, Norman Yee, and Sandra Fewer
Sent via e-mail: @sfgov.org

Re: Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648

Dear Supervisor:

In July of this year, the San Francisco Planning Commission made an error in judgment. I am hoping that research and review by the Board of Supervisors will result in a reversal of their approval for Saint Ignatius College Preparatory high school (S.I.) to install giant light towers on its football field and conduct programs there to 8:30 or 9:00pm at night, on almost every other day of the year. As Commissioner Fung stated when providing the only dissenting vote, the adverse effects to the community have been severely underestimated in the material submitted for review.

Certainly almost every project brought before the Planning Commission has its dissenters. This can give rise to an almost instinctual barrier, based on the premise that progress cannot take place if there is no change, and that sometimes sacrifices need to be made by one side or the other for a greater good. BART needed a right-of-way; bringing down the Embarcadero Freeway was the right choice; there was even sizable objection to building the now profoundly-useful and seriously-symbolic Golden Gate Bridge. But Saint Ignatius's football-lights are not such a case. The benefit here is of a dubious nature, to a small select group of people, if needed at all born of the institution's own ill-planning, and will cause serious harm to others who have a much greater stake in the physical location in question.

No other San Francisco high school, individuals informed us at the July 23, 2020 Planning Commission meeting, has lights on its athletic field for nighttime use. No other. Yet they all manage to provide sports programs for their students. If S.I. has increased its student body and yet failed to develop a time-use plan to accommodate their athletics, or purchase more land (the public soccer fields next to their football field were long vacant sand-dunes a number of years ago), that is this private business's onus. When I attended public high school in San Francisco, there was always plenty of time for sports and clubs and activities in the daylight hours after school. We got out of classes between 2:35 and 3:10pm, and from my understanding, many S.I. students get out even earlier.

Speaking of my alma mater (to which I commuted daily from my family home half-a-block from S.I. -- once the Jesuit school was built. We were there long before S.I.), if a San Francisco school was to need to hold evening sports events, Lowell High School would be an example of a much more viable location: Lowell truly serves all of San Francisco, an achievement-based institution open to any city high schooler. Why give special allowances to a private institution such as S.I. which, though offering financial aid to some, is mainly a large money-making operation only to be utilized by the few who can pay, and pay well? --Very few of whom live in the surrounding Sunset District, many of whom live outside San Francisco. But even more importantly, Lowell's *geography* suits such an endeavor: Its football field is surrounded by the school on two sides, State University on another, and Lake Merced on the fourth. It also has a large parking lot running the length of the field. Or course, even better suited for evening use are fields such as those in Golden Gate Park. It may take a little longer to get to these fields from school, but if time-management and resources force evening sports, the school must make compromises also. Compromises, because they do not operate in isolation:

Saint Ignatius Preparatory does *not* sit inside a park. It does not even stand *across* from a public lake. It sits smack dab in the middle of a residential district, right across the street from people's homes. No distance spaces, no blocking trees, but as you might look out your living room window a few yards across a street to your neighbor's house, so people here look right across the street at S.I.'s football field. Even closer, is the sound. Not the minute-or-two sound of a neighbor entering a home, but the sound of teenagers. Playing sports. For hours. Participants and observers who park right across from, right *in front of* your house, on their way to and from, rarely as quiet as your neighbors, as they are groups of teens in athletic-mood, people cheering for a team, with no thought or concern for you trying to quietly enjoy, work in, live in, your own home.

The community has worked with Saint Ignatius on a myriad of issues over the years, from parking, noise, litter, vandalism, to drug use and sales. Both sides have made numerous adaptations for and compromises with the other, to successfully live together. But these lights and nighttime events are just a step too far. The Jesuits knew when they were constructing a school that they would need to adjust to being directly connected to a neighborhood, a bufferless geographical entity (at least as *they* designed their school grounds), and yet now, they choose to steamroller over their neighbors' concerns, for some unknown reason barreling ahead to the Planning Commission after years of lighting discussions, right at a time when the people of the neighborhood are dealing with their endangered livelihoods, societal upheaval, and literal threats to the survival of their families, due to the world's most deadly pandemic. This lighting issue couldn't have waited until post-vaccine 2021?

As was pointed out at the aforementioned Planning Commission meeting, 40% of S.I.'s student body are not San Franciscans. 100% of the affected Sunset District residents *are* your constituents. Many have lived here well before Saint Ignatius Preparatory was built; others moved in with a school field nearby, but one which like most schools operated during the day. Far different from a place which brings large groups to an open-air football field at evening time when parents are returning home from work, families are having their time together, with children playing, studying, and eventually trying to go to bed. Businesses need to thrive in San Francisco, but not at such an expense for the citizenry. These families, these children, *live* here. It is their homes, their living rooms, dining rooms, their bedrooms, into which the bright light, reflected off ground, buildings, fog, will shine, the noise, litter, and associated problems of athletic-competition-hyped crowds will roar. We welcomed S.I. to our neighborhood, have worked with them for decades on a myriad of issues, for the betterment of both, to coexist and even thrive in our quiet little corner of this great city: Residents accept football games, dances, and other events, but continual evening lighted-field use, which no other San Francisco high school has, based on S.I.'s questionable claims for needing such, places too great a hardship on the people who live here, right next door. Stopping at 8:30pm at night instead of 9, and limiting use to 150+ nights a year, is not an equitable compromise. These are peoples' homes, their evenings, their dinner time, their family time together, their children's study, play, and sleep time. S.I. students and their "associates" (read "customers") getting to play on their sports field not just all day long but into the night is not enough of a gain to justify such a disruption to the home lives of San Francisco citizens.

Thank you for your time, and your consideration,

Allen Malmquist
3031 Quintara St
San Francisco CA 94116

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| **From:** | Qiu C |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); SISunsetNeighbors @hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Monday, September 14, 2020 1:52:51 AM |

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Dear Mr. Mar and Members of the SF Board of Supervisors,

My name is Qiu Chen and I live in the Sunset District at 39th Avenue and Rivera Street. My family has lived in the area for nearly 25 years. I am a taxpayer and a voter. I am asking you to please vote against the proposed St. Ignatius Stadium Lighting project.

The school wants to light up their field like a professional stadium for 150 nights a year until 9/10pm. But this is a residential neighborhood. The field, on which these lights will be installed, is directly adjacent to homes occupied by families, young children, and senior citizens. The late evening bright lights jeopardize our children's sleep schedules, disrupt our evening family time, increase traffic and garbage in the area, and maintain high noise levels throughout the night.

These lights will reduce the appeal and livability of the homes in the area. The lighting poles are 90-feet-tall which towers over our single-family, two-story homes. Most of the homes in this area were built prior to 1950. The walls are thin and sound transmits easily through them. I am use to the school's loud PA system on weekday and weekend events. But I believe the families who live here deserve quiet, peaceful evenings. Our residential community should be able to put our children to sleep at a reasonable hour without the hazards of bright stadium lighting shining into our homes and loud music and noise vibrating our walls.

This project serves no public benefit, other than the private luxury uses of the school. I, myself, played high school sports in San Francisco, and acknowledge the importance of sports for children. However, the stadium lighting project is not necessary to the success of the school's sports programs. In fact, no other high school in San Francisco has this kind of lighting! You will hear from students at the school about why they need these bright lights but the majority of them live outside the area. This benefit to the school will only encourage students to linger around the area late at night, reduce their evening time with family at home, and alter their own sleep schedules. The potential negative effects and burdens imposed on the neighborhood far outweigh any potential benefit it may bring to the students.

As a long time resident, I have felt the impact of sporting events held at the school, including the increased noise, difficulty sleeping, blocked driveways, reduced parking spaces, and

increased trash on the streets. Please help us maintain the livability of this neighborhood by stopping the St. Ignatius Stadium Lighting Project.

Thank you.

Sincerely,

Qiu Chen

**From:** Joy Chan
**To:** Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunset neighbors
**Subject:** Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648
**Date:** Monday, September 14, 2020 12:42:18 AM

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September 14, 2020

Dear Mr. Mar and Members of the SF Board of Supervisors,

My name is Joy Chan and I live in the Sunset District at 2819 Rivera St and I support the SI Neighborhood Association to strongly oppose the Saint Ignatius Permanent 90' tall Lights project.

We live directly across from the SI sport field on Rivera St between 38th and 39th Ave. We already foresee this project will have adverse effects on our family and house, which we worked so hard to build over the years. I remembered earlier this year in February, SI rented a few temporary lights for their night practice. When we got home in the evenings, the lights shined straight into our house, from our living room all the way to our master bedroom at the very back of our house, the whole house was flooded with lights. To give you some context, I measured on Google map, from where the lights were placed, they shined about 500' from the north side of the field all the way across the block and then through my house which is 63' long, approximately 600' of array of lights. My kids said the lights hurt their eyes and we had to close off our curtains for weeks until the Daylight Saving kicked in and SI did not have to use the lights anymore. I had called SI and talked to Tom (Director of Communication) and John (Director of Athletics), they tried to address the issue but it did not help. Although SI claims the newer 90' lights is advanced technology that will minimize lights shining onto the neighbors, who can guarantee it will not be as bad as the lights we experienced earlier this year? Once the lights are installed, that is it, the matter is settled, we have no way to complain. Also, eventhough these new lights may not shine horizontal directly onto the neighbors, the glow of the lights and multiplying by the glare effect from the fog, I do not think the light pollution will be a non-issue.

In addition to that, over the last few years of living here, we have experienced 1) difficult parking during school days, 2) difficult parking during the early evening and weekends when they have games, 3) cars blocking our driveway (the curb side outside our house can only fit a small car, so when someone try to park a larger car, it will block our driveway by a foot or so), 4) double parking all the time at the block on Rivera St between 37th and 38th Ave making driving and crossing streets with my kids very unsafe. Not to mention all the noise and

littering problems outside our home, we have to constantly pick up the emptied snack bags that were left on our sidewalk (I know I cannot prove these were from the SI students but I am sure at least some were from them). These issues will just get worse with SI's 150+ nights of practices and games if they are approved to do so.

Again, I do not see it is appropriate to install these tall lights at the SI school because:

1. The proposed light pole of 90' is 3 times higher than the houses in the entire Sunset area, even higher than any of the building structures at SI. This has a negative impact of the view and feel of the neighborhood and disturbance on the skyline.

2. Sunset district is a quiet residential neighborhood, where many of us come home at the end of a typical long workday to have some quiet and restful time. The lights and night games will disturb the quietness of the neighborhood, impose unnecessary noise and light pollution to the surrounding environment.

3. This project is for SI and their SI affiliated usage only, i.e. that is for a small group of San Francisco community (mostly affluent families) and has no benefit to the general public. Also, we have observed and did not find other public high schools in the City installed stadium lights and are using them for a considerable amount of nights throughout the year.

4. The WTS Antenna was not discussed at the 7/23 Public Hearing. We also want to argue the necessity of additional WTS facility in the area. Looking at the Wireless Telecommunications Facilities Map available on SF Planning's website, the location of wireless/cell towers appears to be well distributed in the Outer Sunset area. We do not see the need of additional wireless tower and understand what the benefits will be.

I was listening to the July 23rd Planning Commission Public Hearing Meeting and I was disappointed at the Commission's decision 6-1 vote approving SI's Conditional Use Authorization. It is interesting that as each of the Commissioners was making comments and voting, they shifted focus to the number of nights the lights could be on in a year and till what time at night, 8:30, 9:00 or 10:00pm and not on why the lights are needed in the first place. Honestly, 200 nights down to 150 nights does not make too much difference, it is still a lot for 150 nights which is like almost every other night. Requesting SI to turn off lights at 8:30 is still too late with families that have young kids. SI School Principal argued that High Schoolers need quality of sleep so they want to start school day late and thus need to extend after school practice till evening. How about our young kids? I have a 2nd grader and a preschooler, they have to wake up early to get to school before 8am. Is their quality of sleep not important? Unless all schools in SF has late start, this is a selfish plan for just benefiting SI's students.

Please, as representatives of the residents of San Francisco, please stop the SI project to light and use their football field. This project is really pushing forward

to the advantage of SI only but at an expense of the neighbors.  There are many alternatives they can do to continue promoting their strong athletic programs and having night practice is not the only option. Can they better schedule their class time?  Shift some of the practice to during the day and other classes in the evening if the students are to stay longer hours at school anyway?  On the other end though, we have no options, this is a neighborhood we live in, family and house we worked hard to raise and build.  To not get impacted, does it mean we can only move to elsewhere?

Thank you,

Joy Chan

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|---|---|
| **From:** | seiko grant |
| **To:** | Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunset neighbors; Board of Supervisors, (BOS) |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Sunday, September 13, 2020 10:19:59 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

From:Seiko Grant
2931 Rivera St.
San Francisco, CA 94116
09/09/20
To: SF Board of Supervisors

Re: Appeal of CEQA Exemption Determination and Conditional Use Authorization

Dear Mr. Mar and Members of the SF Board of Supervisors,

My name is Seiko Grant and I have lived in the Sunset District for 56 years, 53 of those in my current home half a block from Saint Ignatius College Preparatory (SI) high school. During this time I watched SI being built and transition from an all-boys to a co-ed school. The residents adjusted to the increasing traffic,parking issues and weekend noise from events at the J.B Murphy field. We could always depend on a return to quiet streets in the evening after a full day of work and to get to sleep in preparation for the next day. This is a basic condition that everyone, including all of you on this board,needs for a healthy existence.This is why we chose to invest our money and spend our lives here. Our homes provide a space to rest and gather comfort. Our neighborhood is a source of support and safety.We feel very fortunate.

SI is planning to install permanent night time stadium lighting on J.B Murphy field using LED lighting arrays the size of a dumpster on poles rising 90' high. They anticipate use of the lights for over **150** nights a year and until **9 and 10:00 pm**.The administration at SI have not been forthcoming about the specifics of this proposal. Details have been changing in every announcement and emerging sporadically. Initially, they repeatedly stated that there would be only 10 night events a year.Though legally required meetings have been held and advisory notices distributed, feedback from residents affected by this plan is not given much weight as this project is considered by SI as destined to be completed according to their wishes. In enlisting a telecommunications provider, Verizon Wireless,to install a series of antennas to one of the proposed 90' light poles, the project may be considered an essential service and thus fast-tracked during the pandemic restrictions.

Light pollution,noise pollution and increased traffic to the extent that they would significantly effect living conditions for a large number of residents and avian life in the area surrounding the J.B.Murphy field are of great concern. A thorough investigation into these effects including a full environmental review in accordance with the California Environmental Quality Act must be conducted. I strongly object to the exemption from environmental review. On the one hand, in the conditional use application, SI states that " Traffic will not be increased, as persons already attending the school will use the field." In the project application, they state that " The lights bring people to the neighborhood.." and " the field is used by a variety of non-profit institutions…". These conflicting statements must be resolved. A greater number of night events will definitely increase traffic.

One reasoning for SI wanting to go forward with this project as stated by their representative, Mr. Tom Murphy, in the online meeting of 4/30/20 is to allow a later start time of the school day quoting studies showing later sleep cycles for teenagers. Again in the project application ,"..providing greater opportunities for students to have adequate sleep." Mr. Murphy also mentioned that night games during the week will allow those families to have weekends free and reduce traffic on Saturday. Would that they have as much concern for the weekends and sleep time of the neighborhood residents to whom they say they want to be good neighbors. The enhanced educational experience desired by SI would be better served by teaching the students time management and that participation in extra-curricular activities require adjustments and often sacrifices by both students and parents which may not always be convenient. Students should <u>not</u> be taught that if timing is not convenient ,it is OK to change the character of an entire neighborhood to accommodate one's schedule. Also,I do not know any student who objects to leaving class early to go play their favorite sport. Proponents of this project attempt to portray the neighbors as anti-sports. Not true, all are aware of the benefits of youth sports. But all are also aware of the health benefits of a quiet evening at home after work and school and a good night's sleep.

There is no other school in San Francisco which has lighted fields on their campus. All those schools continue to provide excellent educational experiences without negatively disrupting the lives of the neighborhood. There was no discussion or questions allowed at the meeting of 4/30/20 that were not "related to the project". I consider the concerns of the residents living around the field directly related to the project. When planning commissioners amended provisions of the permit application, no input from the representatives of residents heavily affected by this project were allowed.Of particular concern is the open-ended wording in the proposal which ensure expansion once the lights are installed.

"SI is requesting usage until 10 pm so as not to restrict future unplanned and/or changed use of
this field"
"unsure of future needs"

"At this time/in the short term"
"Large attendance/noisy events will not occur very often"

Any other parks in San Francisco with night lighting are open for use by the general public. The benefit of "expanded use of existing open space" at J.B. Murphy field is restricted to the students/families of SI. The cost, including reduced property values, will be borne by the entire neighborhood. I object to the proposed night lighting on the fields at Saint Ignatius College Preparatory and request that as representatives of ALL the residents of this city, please decline to allow this project to go forward.

Sincerely,

Seiko Grant

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| **From:** | Donna Bruno |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Sunday, September 13, 2020 9:02:18 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Mar and Members of the SF Board of Supervisors,

I live in the Sunset District near St. Ignatius College Preparatory. I am a taxpayer and a voter. I strongly **OPPOSE** the St. Ignatius plan to light their main field and hold 150 or more-night events. That field is not surrounded by public lands like Balboa Park, nor a parkland like Beach Chalet fields is surrounded by GGP and Ocean Beach. The field they want to illuminate to a professional level and utilize into the night is bounded by my residential family neighborhood - it is closely bordered by the homes in which we live.

35 years ago, I bought my home and moved into this RESIDENTIAL district aware of the multiple recreation fields, public schools, gardens, and one PRIVATE high school. I love my ocean view for its beauty but also for the value it adds to my home. Our neighborhood has always been clean and safe. In particular, nights are quiet. The Sunset District is very family oriented. It is simply **UNJUST** to now make a huge change in the neighborhood by allowing these huge and much too tall light stands at St Ignatius High School. That is **NOT** what I want to see when I look out my window! Require SI to put in retractable light stands that are only extended when in use and do not allow them in use 150 nights per year. That is an excessive burden on the neighborhood. In general, SI is **NOT** a very good **neighbor** to us and this proposal exactly illustrates the fact.

St Ignatius, serving students only of which 60% live in San Francisco and only a small percent of that in the Sunset, now wants to turn our residential family neighborhood into their private sports event center. They want 90-foot-tall light standards with huge light arrays in a residential neighborhood with single family, 2 story houses, and height limits. These night events will overrun our neighborhood with cars parking, double parking, sometimes reckless driving, all bringing teens and adults from beyond our neighborhood and even beyond San Francisco (since 40% of their private population is from outside the City) to SI -- taking up residential parking space, making noise at high levels and disrupting family time in our homes, leaving behind garbage & trash on our property, and on public streets/sidewalks. They want to do all this for 150 or more nights a year. All of this is **completely out of scale and character for our neighborhood and does not belong here.**

No other high school in the City does this. No other school is having a problem scheduling all of their teams without night events.

No public school is determined to make a profit by renting private event space to "affiliates" by linking these other private institutions to themselves by assigning an employee to work for both.

We have direct experience when St. Ignatius has rented night lights in the past and are very much aware of the impacts (noise, traffic, parking problems, late night drinking, etc.)  due to their night events.

Please, as representatives of the residents of San Francisco, please stop the SI project to light and use their football field at Rivera St and 39th Avenue 150+ nights per year.

Please keep the Sunset District a residential family neighborhood.

Thank you.

Sincerely,
Donna Bruno
2135 26th Avenue

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| **From:** | Sue Lynn |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Sunday, September 13, 2020 8:44:25 PM |

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September 13, 2020

Dear Mr. Mar and Members of the SF Board of Supervisors,

I live in the Sunset District near St. Ignatius College Preparatory. I am a taxpayer and a voter. I strongly opposed to the St. Ignatius plan to install 90-foot lights in their main field and hold 150 or more-night events.

The 90-foot-tall lights with huge light arrays will TOWER over our single family, 2 story houses. The SI field and the lights are visible from our dining room and living room windows. It's unimaginable to have 9-story-tall light panels erected amid our 2-story homes. Those lights would disrupt our daily family lives and our neighborhood.

We love our quiet neighborhood with its clean and safe environment. This is what we treasure and chose to raise our children. My kids walk by the SI field to get to near by recreation fields, public school, and playground. My spouse and I could come home after a long day at work and park our cars near our home. The Sunset District was made up of working families just like us.

The 90-foot-tall array of light in the middle of our neighborhood along with the 150 nightly events would drastically change the look and feel of our neighborhood, and our daily family life. The night events will flood our neighborhood with cars parking, double parking, sometimes reckless driving that endangers our children.

Besides the parking congestion and increase accidents, there is the noise factor which disrupts our family times and bed times in our own home. Like many of our neighbors, both my spouse and I work full time and have small children doing online learning at home so with what little time we have, we're writing to express the importance of keeping our home and neighborhood safe and clean.

I grew up and went to school in San Francisco and I don't recall my high school having 150 night events or requiring 90-foot-tall lights. Why does this school deserve the exception? And why should this school's lighting need at the expense of our family life and the safety of our neighborhood?

Please, as representatives of the residents of San Francisco, stop the SI project to light and use their football field at Rivera St and 39th Avenue 150+ nights per year.
Please keep the Sunset District a residential family neighborhood, a neighborhood that we all love!

Thank you,
Susan

**From:** antiquepc@yahoo.com
**To:** Board of Supervisors, (BOS); Mar, Gordon (BOS)
**Date:** Sunday, September 13, 2020 8:26:21 PM

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This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Catherine.Stefani@sfgov.org" <Catherine.Stefani@sfgov.org>,
"
dean.preston@sfgov.org" <dean.preston@sfgov.org>,
"
Matt.Haney@sfgov.org" <Matt.Haney@sfgov.org>,
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mandelmanStaff@sfgov.org" <mandelmanStaff@sfgov.org>,
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Shamann.Walton@sfgov.org"
<Shamann.Walton@sfgov.org>,
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Aaron.Peskin@sfgov.org" <Aaron.Peskin@sfgov.org>,
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Ahsha.Safai@sfgov.org" <Ahsha.Safai@sfgov.org>,
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Hillary.Ronen@sfgov.org"
<Hillary.Ronen@sfgov.org>,
"
Norman.Yee@sfgov.org" <Norman.Yee@sfgov.org>,
"
Sandra.Fewer@sfgov.org" <Sandra.Fewer@sfgov.org>
From: Peter Cheng <antiquepc@yahoo.com>
Subject: Lights in SI school
Date: Sun, 13 Sep 2020 20:25:48 -0700
Importance: normal
X-Priority: 3
Content-Type: multipart/alternative;
boundary="_B0E229DF-59CA-47C0-B1E6-1E0C12251FFD_"

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Content-Transfer-Encoding: quoted-printable
Content-Type: text/plain; charset="utf-8"

Dear Mr. Mar and Members of the SF Board of Supervisors,
I live in the Sunset District near St. Ignatius College Preparatory.
I am a taxpayer and a voter.
I am strongly opposed to the St. Ignatius plan to light their main field an=
d hold 150 or more-night events. This is way too much. I can understand one=
 game a week but not 150 games a year. That field is not surrounded by publ=
ic lands like Balboa Park, nor a parkland like Beach Chalet fields is surro=
unded by GGP and Ocean Beach.=C2=A0 The field they want to illuminate to a =
professional level and utilize into the night is bounded by my residential =
family neighborhood - it is closely bordered by the homes in which we live.

I moved into this RESIDENTIAL district aware of the multiple recreation fie=
lds, public schools, gardens, and one PRIVATE high school. I could come hom=

e and park my car near my home if not directly in front of my home. The nei=
ghborhood was clean and it was safe. Nights were quiet. The Sunset District=
 was very family oriented.

Now, St Ignatius, serving students only of which 60% live in San Francisco =
and only a small percent of that in the Sunset, wants to turn our residenti=
al family neighborhood into their private sports event center. People live =
in Sunset has no priority of getting into the school.

They want 90-foot-tall light standards with huge light arrays in a resident=
ial neighborhood with single family, 2 story houses, and height limits.
These night events will overrun our neighborhood with cars parking, double =
parking, sometimes reckless driving, all bringing teens and adults from bey=
ond our neighborhood and even beyond San Francisco (since 40% of their priv=
ate population is from outside the City) to SI -- taking up residential par=
king space, making noise at high levels and disrupting family time in our h=
omes, leaving behind garbage & trash on our property, and on public streets=
/sidewalks.=20
They want to do all this for 150 or more nights a year.=20

No other high school in the City does this. No other school is having a pro=
blem scheduling all of their teams without night events.=20
No public school is determined to make a profit by renting private event sp=
ace to "affiliates" by linking these other private institutions to themselv=
es by assigning an employee to work for both.
Beyond all of the resulting disruption and disregard for Sunset residents w=
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We have direct experience when St. Ignatius has rented night lights in the =
past and are very much aware of the impacts (noise, traffic, parking proble=
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Please, as representatives of the residents of San Francisco, please stop t=
he SI project to light and use their football field at Rivera St and 39th A=
venue 150+ nights per year.=20
Please keep the Sunset District a residential family neighborhood.

Thank you.

Peter Cheng
Live on 39th Ave between R and S. Thank You

Sent from Mail for Windows 10

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| **From:** | lance m |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com |
| **Subject:** | Please do not put up those lights at SAINT IGNACIAS HS |
| **Date:** | Sunday, September 13, 2020 8:09:31 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

LEAVE THE STADIUM THE WAY IT IS. WE DO NOT NEED ANY DAM LIGHTS. WHY WOULD YOU, IN THIS DAY OF POLLUTION AND GLOBAL WARMING EVEN CONSIDER THIS???????????????????????????????????????????????????????????????????????????????????????????????????????????????????
THE MAJORITY OF PEOPLE IN THE AREA ARE GREATLY OFFENDED AND OUTRAGED THEY WOULD WANT TO DO THIS. CEASE AND DESIST !!!!!!!!!!!!!!!!!!
!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!Please!

| | |
|---|---|
| **From:** | Timothy Brey |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Sunday, September 13, 2020 7:44:42 PM |

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December 13, 2020

**Dear Mr. Mar and Members of the SF Board of Supervisors,**

**I live in the Sunset District, across the street from the south end-zone of the SI JB Murphy field.**

**I am a taxpayer and voter.**

**I am writing to express my disapproval for the Ignatian Corporation's request to install 90 foot lighting fixtures on the JB Murphy field.**

**I am deeply frustrated that the commission voted 7-1 in approval for the project, never looking at the the main conflict of a private entity benefiting at the expense of the public, in other words, private gain, public subsidy. This is crony capitalism whereby the money and influence of a private player, Saint Ignatius, overrides the interest of the public.**

**Comments in the commission meeting from those in favor of the project, students and parents mainly, all centered on how wonderful sports were and how great it would be for the students. Jeff Horn, the project manager, didn't even appear neutral as he touted the benefits of sport. No one was disputing sports, and if you listen to the comments in favor, there is no rational argument that you can make to say these lights are a benefit the the local neighborhood or the general SF public.**

**The request for Cellular Service Antenna (so deemed essential) should be a separate application from change of use with lighting.**

According to Dun & Bradstreet, "The Ignatian Corporation is part of the Private Schools K-12 Industry, generates 39.31 millions in sales (USD)."

Saint Ignatius is a private entity with a school tuition of $26,000, is not a public institution and does not provide any public services to the local Sunset community.

**The Ignatian Corporation's Master Plan stated rationale of the need for lights is a joke. They claim the need for lighting due to the hardship in having 66 teams competing for use of the "facility" which again is not the Sunset neighborhood's problem and is also disingenuous since out of the 15 sports, 10 do not use the JB Murphy field (basketball, volleyball, golf, cross country, tennis, waterpolo, rowing, softball, swim & diving, baseball). Again, a private entity that wants to offer it's exclusive clientele a "sports night club" at the expense of the community.**

The claim that "it will have no impact on traffic and parking" is simply not true. Increased time/use of the field logically means more impact on traffic and parking. They profess how their lights will be newer technology etc. than what was installed at the South Sunset and Beach Chalet fields. This is a misdirection, since they neglect to state that both South Sunset and Beach Chalet are public fields, both of which I have had the pleasure to practice evening soccer with my daughter over the past years. We San Franciscans derive no such benefit from SI's light installation, only a socialization of costs for private benefit.

I note that the City's Planning Code Section 101.1(b) establishes eight priority-planning policies and requires projects to comply with said policies.
Two of the policies (2 and 8) clearly are not being adhered to if the commission allows the installation of 90 foot light towers and use of the field until 10 pm.

(2) **That existing housing and neighborhood character be conserved and protected in order to preserve the cultural** and economic diversity of our neighborhoods;

Residents have come to terms with the regular day-time use of the competitive sports programs of Saint Ignatius, including the noise from crowds and the PA system. Day use includes early morning practices with coaches blowing whistles and teams chanting. I have no reasonable objection to this. This neighborhood is zoned single family residential, but this radical change in use (lighting until 10 pm) will burden all neighbors with increases in parking, traffic, noise and light pollution. Lighting on the field and the use of the field until 10 pm will change the character of this neighborhood forever, in a negative way.
I have never heard the suggestion that with a later student start time as SI proposes, those students participating in sports do so during the daylight hours, and extend classroom instructional time into the evenings. Again, what is good for the students and not what is appropriate for the neighborhood.

**(8) That our parks and open space and their access to sunlight and vistas** be protected from development.

I have come to refer to our neighborhood as the "Big Block," composed of Saint Ignatius, West Sunset Fields, Sunset Elementary, Ortega Park and Library, and AP

Giannini. It is truly unique in that all the power lines, phone and cable lines are buried, leaving a spacious and clean appearance. The vistas looking out from various points in the neighborhood towards the Pacific and up towards Mt. Tamalpais are marvelous. Having 90 foot light poles will degrade these views. Point 8 mentions "sunlight," a shame it doesn't also include "night sky" as the light pollution would only degrade the areas night sky.

Commercial Enterprise - Saint Ignatius has historically and regularly rented 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, to name but a few. These are commercial operations that the further impact the neighborhood. With new lighting, the Ignatian Corporation will likely continue to rent out the field to private groups, allowing themselves to gain more at the public expense.

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.

I certainly wouldn't expect my neighbors to support, or the city to permit, if I were to propose opening a nightclub/bar in our downstairs garage open only until midnight. Oh, I'll mitigate the sound issues with extra insulation, and I'll hire security to keep people from lining up outside and urinating etc. Haha, this is just what SI has done!

**If the JB Murphy field were a public park/field, the lights would benefit all people, not just a select few.**

No other high schools (public or private) in SF have lighting and there's no reason to start such a trend. There are other fields available for special events or final matches that could be used. Or, Saint Ignatius should continue to utilize rental lights for limited events or special games.

I had hoped the SF Planning Commission would have acted in the interest of the neighbors and public by denying the Ignatian Corporation's (Saint Ignatius College Preperatory High School) request for lighting, but the emotional pleas from those in favor of sports and Saint Ingatius' public relations bit, touting how they serve (some) underprivileged and students of color seemed to provide the cover for the commission to vote in favor.

Please consider fully evaluating the public good that comes from having lighting on a private field until 10 pm, the impacts on parking, traffic, and noise. Considerations should be given on the impact of lighting on wildlife, red tailed hawks for one. At the very least, please separate out the so-call essential service Cellular Tower request from the non-essential stadium lighting.

Thank You,

Tim Brey
2831 Rivera Street
**San Francisco, CA 94116**

Sent from my iPad

| | |
|---|---|
| **From:** | Jay Manzo |
| **To:** | Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com; Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); Board of Supervisors, (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS); sisunsetneighbors@hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Sunday, September 13, 2020 6:38:53 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

September 13, 2020

Dear Mr. Mar and Members of the SF Board of Supervisors,

I vote and pay taxes and I live in the Sunset District near St. Ignatius College Preparatory.

**As a practicing architect, I can safely say that SI's Field Lighting plan is going to degrade our quality of life permanently. This is a private institution benefiting at expense of the public realm. This is NOT how a Conditional Use Authorization should be given. We live here and the lighting plan will give NO benefit to the community. The Planning Commission has all but ignored the neighborhood opposition which has been detailed in our previous submissions.**

I completely oppose the St. Ignatius plan to light their main field and hold **150 or more-night events up to 9pm at night. Four ninety (90)-foot-tall light standards with huge light arrays in a residential neighborhood with single family, 2 story houses, and height limits is completely out of scale with the neighborhood. For a third of the year, these lights will create light pollution which will adversely affect children's' and seniors sleep rhythms and working families just trying to have a quiet evening!** Evening skies for our community will have light pollution that will hide the stars for a third of the year.

**This is not fair—this plan creates absolutely no benefit for the community. The Planning Dept has not listened to the community.**
**This is a private institution degrading the quality of life of their neighbors—150+ nights a year. This is not reasonable and the city should not allow it.**

This proposal is for private fields which only SI uses. The community does not have access to these fields. Almost half of SI students live outside the City, yet SI wants to turn our residential family neighborhood into their private sports event center with us bearing the day to day consequences—especially into the evenings!
No other high school in the City does this. No other school is having a problem scheduling all of their teams without night practices and events.

As representatives of the residents of San Francisco, **please stop the SI project to light and use their football fields at Rivera St and 39th Avenue 150+ nights per year with adverse effects on the quality of life for the surrounding families.**

Thank you,

Jay Manzo
Architect
3025 Quintara Street
SF, CA
94116

**Jay Manzo** AIA, LEED® AP BD+C
Associate

Pier 1 The Embarcadero, Bay 2
San Francisco, CA 94111
+1 415-214-7256

ehdd.

| | |
|---|---|
| **From:** | Edmund Lim |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Subject:** | No, Saint Ignatius Permanent Stadium Lights! |
| **Date:** | Sunday, September 13, 2020 4:33:26 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To the Board of Supervisors,

My name is Edmund Lim and I live at 2163 39th Ave, San Francisco, CA 94116 and my elderly parents live next door at 2159 39th Ave. San Francisco, CA 94116
My parents and my wife and I are members of the S.I. Neighborhood Association and we support the appeals against the proposed Saint Ignatius Permanent Stadium Lights .

Living directly across from the Saint Ignatius football field we already experience the school's sports with loud speakers early in the morning for practices, no parking, our driveway blocked, litter in our front yards, urinating, shouting with foul languages, speeding up and down the streets and wreckless driving.
We have grown used to this during the day but then they all go home at night.
In the past months when they were using the Temporary Portable Lightings, it was Super Bright! That we had to close our windows blinds and curtains so the lights don't shine through our windows. When S.I. have their evening games, we hear the loud noises, Screaming, Shouting, loud Fog Horns, Cow Bells, and music blasting loud!
Double parked cars on the streets and blocking our driveways!

Now with S.I.'s proposed stadium lighting this noise, traffic, parking problems and litter will invade our homes 150 evenings nights a year..... that's almost half the year!
150 nights a year of not being able to talk with my parents at dinner, hear our TV, or for my parents to go to bed early.

S.I. says they need these lights mostly for their student's sports practices and training. Why can't they just better organize their schedules and use the practice field they already have that has lights. Even the S.I. sports practices are loud because they use loudspeakers for those too.

My parents are old and my father is ill. Now they have to have their evenings disrupted just because S.I. says they need to have stadium lights.
No, S.I. just wants the lights and because they are a "Rich Private School" they are going to disrupt our lives in our neighborhoods.

Bottom line is "We don't want Saint Ignatius Permanent Stadium Lights!"

Thank You,
Edmund Lim

| | |
|---|---|
| **From:** | Tiffany Pavon |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Cc:** | sisunsetneighbors@hotmail.com |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Sunday, September 13, 2020 11:58:52 AM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

We are the Pavon Family and live in the Sunset District at 39th Ave and Rivera directly across from the SI field.

Saint Ignatius (S.I.) is planning to install permanent nighttime stadium lighting on their football field. These LED lights will rise 90 feet above the field which is located in our own residential neighborhood.

SI is proposing these stadium lights to be in use for over 200 nights a year and up until 10 pm. This is a residential neighborhood.

As I live directly across the street from the field with my family that includes a 12-year-old. This will disrupt our life beyond what is acceptable. Most of these homes have bedrooms in the front directly facing the field and with lights, games, noise, traffic etc our right to quiet enjoyment is at stake.

Having more events and lights and noise that go until 10pm weekdays is just not feasible. On a regular game day, we already have issues with traffic, double parking, blocked driveways, noise and safety. Leaving our home on game days is extremely difficult with our driveway constantly being blocked and double-parked cars making it difficult or even impossible to leave our own home. Add to this nighttime games with loitering and people gathering after games this will create a noise and safety problem in our neighborhood.

We as neighbors have reported our issues to SI just to get brushed aside. We are a residential neighborhood and there is Absolutely no reason that the city should allow this to proceed.

SI is a private school that will only benefit them and not the neighborhood or city, this will use our city resources more- police, garbage, MTA etc, stretching it thin and taking away from our neighborhood safety.

39th Ave and Rivera are bus lines and during games busses have to go around double parked cars creating dangerous conditions for drivers, riders, pedestrians and neighbors.

++++The project has been renamed as a Verizon wireless project when it is actually a project to install 4 Permanent Stadium Lights with massive impact on our neighborhood

The meeting was shut down by SI  -20 minutes early without any of the neighbors ever taken off mute and without any discussion.

It appears that SI is taking advantage of the current virus and the need for remote meetings to mute their neighbor’s ability to ask questions and voice concerns.
They couldn't MUTE us in an actual in-person neighborhood meeting during normal times.

The Pavon Family

| | |
|---|---|
| **From:** | DM Little |
| **To:** | Mar, Gordon (BOS) |
| **Cc:** | Board of Supervisors, (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Friday, September 11, 2020 2:15:49 PM |

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Plumier

September 11, 2020

Dear Mr. Mar and the San Francisco Board of Supervisors,

In 1956 My husband (Olof C Malmquist, Jr) and I had a choice: build our home in San Francisco, or build our house in Sausalito. My husband was a 2nd generation native San Franciscan. His father, Olof Carl Malmquist, was a prominent sculptor with works throughout the City, throughout the Treasure Island World's Fair, all throughout the Bay Area counties. Our friends were buying homes in the Sunset District. SFUSD and the Archdiocese of San Francisco had schools within walking distance of homes in the Sunset and our daughter was 4 years old, almost ready to start school. We chose the Sunset District in San Francisco.

My husband was an Architect; many of his designs and specifications can be found throughout San Francisco and the Bay Area. His main focuses were on schools, senior housing, water treatment plants. He designed the ice rink for the Olympics at Squaw Valley. He designed the post free roof for the San Bruno gymnasium. He designed our house remodel/expansion. He did all the detail work on our home himself. He hand built our redwood back deck. He designed the remodel for his best friend next door. He worked on the expansion for our friends' home around the corner. He helped all of our neighbors with design and actual work as they improved their homes and yards.

We raised our children in this home. My daughter and son-in-law take care of me in my home; they plan to live in our family home.

SI has decided that they need better appeal and more income. They want to disrupt our neighborhood and home-life with field lighting and night facility use. As it is now, they rent lights and bring in large numbers of people who bring in garbage, provide increased noise, urinate in my doorway, make it difficult for my family to pick me up/bring me home and for them to visit.

Why does a private school get priority over tax paying voting residents? Why should a for profit business get to disrupt a residential neighborhood for 150+ nights each year?

Please stop this bully behavior by stopping SI's planned lighting and night use project. Please support our neighborhood - a place of families and family homes.

Thank you.

*Marie Malmquist*
home owner 3031 Quintara St SF CA 94116 (only 200 feet from SI)

florence723@yahoo.com

Plumier

Yahoo Mail Stationery

| | |
|---|---|
| **From:** | DM Little |
| **To:** | Board of Supervisors, (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS) |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Friday, September 11, 2020 1:45:12 PM |
| **Attachments:** | 2020 911 SF Supervisors.pdf |

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Please see attached for .dox/pdf copy.
Thank you for your consideration.

D Malmquist-Little

**Denise Malmquist-Little**
**florence723@yahoo.com**

# MALMQUIST FAMILY TRUST

Denise Malmquist-Little Trustee

**Trustee holds full Power of Attorney for all matters pertaining to**

**3031 Quintara St. SF CA 94116 AND Marie J. Malmquist**

CONTACT: 415-665-4746 florence723@yahoo.com


**Concern: Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648**

September 11, 2020

Member of the San Francisco Board of Supervisors,

Thank you for this opportunity to express concerns over the field lighting and field use project initiated by St. Ignatius College Preparatory.

First, the project address (2001 37th Avenue) is not the exact location of the project. The field is located with its West side running the length of 39th Avenue between Rivera and Quintara and the South side of the field is edged by Rivera Street and 39th Avenue eastward. The address given by SI for the project is not near any private residences, the address being edged on the East by Sunset Blvd and on the other three sides by their own school property. *This is deceptive when looking at the effects on homes and families in the better than 70-year-old residential neighborhood*. The residential configuration of the Sunset existed before SI bought property. Many of the homes are still with families who purchased in the 1950's and early 60's; we purchased and have lived in our home since 1956 – that's 13 years before SI opened their doors – we have neighbors who have been in residence longer. Our property isn't too close to 2001 37th Ave, but it is less than 200 feet from the field SI wants to light and use more than 150 nights a year.

Two projects are presently linked: St Ignatius installation of 90' tall field lights and Verizon's use of space on a light post and property of SI for cell antenna installation. The Verizon part of the project doesn't need a 90' tall poll nor a light. We are not concerned with the unmanned antenna and suggest the projects be separated.

We are very concerned about the installation and use of field lights around the SI athletic field along 39th Ave and River Street, and the use of those lights/field for at least 150 nights a year.

We feel that SI is being considered over the residents of our neighborhood. We are a quiet neighborhood with about 56 homes per block; this is a family neighborhood so that is about 224 residents per block. Four blocks are on the perimeter of the field/SI property … that's about 896 San Francisco residents (voters and future voters, tax payers and future tax payers). That's just in the 300' notification area; the effects of construction and use of lighting for this field, and influx of people, noise, traffic for 150 or more nights a year reaches beyond 300' and therefore the number of homes and residents affected is far beyond 896.

SI keeps changing how many nights the lights will be on, but our last contact with their representatives left it at lights on until 9:30 or 10pm 200 nights/year. There are only 180 school days per year, so they must also plan on every Friday, Saturday, Sunday!

As others brought up at the Planning Board meeting, no other high school in the City has night lights nor night games, and they do fine scheduling practices and games within natural light hours. City fields available for night games, such as Balboa Park and Beach Chalet, are in areas without bordering residences and are available for rental.

What are the effects to which we object? Things that have affected us and our property during times past that SI has rented lighting and held night events in their largest field, such as:

•*traffic & parking*. Evening use ties up all parking in the area right when families are coming home. There is no parking left in front of our own houses. We have to park blocks away. This is very difficult for seniors, those bringing home groceries, those with children & all their stuff arriving home. Another problem is the double parking as visitors to the event link up with friends making getting down the street unsafe as one must maneuver around double parkers sometimes having to drive down the wrong side of the street; this is especially bad at the corner of 39th/Quintara with the blind hill and presence of SI and MUNI buses. After day & evening events we have witnessed kids riding on the outsides of cars (such as roof, hood, steps), drag style racing, items being thrown out of and at cars in motion, passengers standing in moving cars yelling and screaming out sun roof, and overloaded cars (carrying underage passengers piled in and without seatbelts or even seating).

•*trash & garbage*. After events in the field, trash and garbage (such as food containers, cigarettes, drug related items, condoms, and more) are left on sidewalks, along curbs, and on our private property. Our home entryways are used for "privacy" by attendees for "buys," sexual activity, drug use, smoking, and trash dumping; we are left to clean up garbage that has included needles, condoms, broken glass, and human waste.

•*noise*. Coaches blow whistles and yell directions/comments. Starting guns are fired. A PA system broadcasts loudly play-by-plays, statistics, trivia, music, field calls, scores, and more. Crowds yell to be heard over all the others yelling; they cheer, boo, stomp on bleachers. Practices and games are really, really loud. Doesn't matter if windows are shut, doors are shut – the noise from the field gets into the house. To hear music or TV or even have a conversation inside the house requires that we be super loud! The noise is too much for us to enjoy our yard or back porch. At night, the noise goes on past bedtimes, it interferes with concentration on projects, homework, evening tasks. Relaxing and productive home-life are both impossible during field use. Another facet of noise is after events with car engines idling while people stand around right in front of our homes talking loudly, car sound systems blast out music, sidewalk language is sometimes inappropriate. So much for quiet residential area.

•*light*. We are a foggy neighborhood. It comes in almost every night; the heat in the east valley areas just sucks that marine layer in from the ocean. Fog spreads light glare. Even without fog, the lights are only 50 feet in front of the windows of all the homes along the sides of the field. Houses are 20-30 feet tall, so 90 feet towers over & down onto us; light will be shining into our yards too. Field lighting has in the past disturbed home lighting, TV watching, yard/porch use. It is on late enough to disrupt sleep patterns.

SI and the SF Planning Commission have severely understated the adverse effects of their project on our neighborhood.

The completion of this project would benefit the smaller private community of SI and their affiliates; there are no benefits for the larger more populace, public, tax paying neighborhood of actual San Franciscans. SI has a population that is 40% from outside of San Francisco! Why is the privilege of out-of-City/County attendees put before actual San Francisco residents?

SI claims to be a good neighbor. In some ways, they are – their security department responds quickly when student cars block driveways or misbehavior is noticed and reported. That doesn't mean the problem gets solved quickly, but they do respond. SI used to allow neighborhood pool hours. That stopped. SI has a website for neighborhood interaction with the school. Personally, I have submitted questions; I have never received answers or been contacted.

Sports is one aspect of the high school experience and content purpose. We understand the need and want for sport activities. We don't see the need for SI to:

•*make money* from "affiliates" by allowing groups that really are not part of the school program to rent field space, allowing the private business that is SI to profit while the neighborhood suffers. Assigning a faculty member to serve at the "affiliate" in order to claim school connection is a phony, sneaky, and wrong way to treat the neighbors and to try to make more money.

•*claim* that the *shift in* starting *time* (SI plans to start the high school day 45-60 min later than before because of studies showing teens do better with the later shift) pushes the need for lights to at least 10pm; is a bit over the top. A 45-60 minute shift in scheduling times is only a 45-60 minute shift in the number of daylight hours the field is available. During the school year, the sun sets anywhere from 7:30 PM through about 6 pm back out to after 8:30 pm. We have no mountains making the sunset seem earlier. Lights don't need to be on until 10 pm. SI says events will end by 9:30 and clean-up by 10 pm, but our experience is that participants and attendees stay for an hour or more after events; that could put those last to leave the field out in the neighborhood making noise, leaving trash, etc., until 11pm or later.

•*say being coed adds the need for twice the activities to schedule*. SI has been coed since 1989 – that's 31 years! Title IX passed in 1972, providing for equal sport opportunities for males and females. Scheduling for both male and female teams is NOT a new problem to be solved! Unless they have been out of compliance, SI has been scheduling for both sets of teams since 1989. All our city high schools schedule for male teams, female teams, and sometimes mixed teams – and they do it without field nights.

Then there are all the construction problems that come with this project. They include but are not limited to:

•*direct home problem*: foundations for these 90' poles need pilings driven down 30' into the sand under the field! When the water treatment plant out by the zoo was built, construction drained an underground lake in our neighborhood causing houses on both sides of 40$^{th}$ Ave to sink and tilt. When the pump house for the well in the parking lot on 40$^{th}$ and Quintara St was built, the drilling caused nerve racking noise for days on end. Houses shook with large construction vehicles driving up/down our hills and streets. Pile driving interfered with concentration and daily living in our home. In our house, home décor has fallen from walls, items have vibrated right off shelves, and during hook up into the main water system, our water was iffy in service and quality! However, both of those projects were for the good of the City – many benefit from the resulting services. SI is going to shake our homes, disrupt the ground under our homes, wear out

our public streets with heavy vehicles, make a lot of noise, and more … all for the benefit of just their private school community, 40% of which don't even live in San Francisco.

•*public/neighborhood problems* include: due to increased traffic for delivery of construction materials and machinery, disruption of bus service, use of parking areas by construction vehicles, dirt from pile driving. Changes in noise and light levels will disrupt natural cycles of the many birds that living in the trees of Sunset Blvd. The unknown factor: what will shifts of the sand under streets, sidewalks, public fields, etcetera, do in terms of damage?

Overall, in our homeowner opinion, this project is all about a private business wanting to increase its appeal and make money.

Our neighborhood will suffer permanent disruption.
San Francisco residents will be overlooked in favor of private profits.
Voting, tax-paying citizens will have to call on insurance and personal funds for any home damage incurred.
Lives of multiple generations (parents, children, grandparents, and maybe more) will be disrupted in terms of quiet, family activities, and usefulness of personal property such as living rooms, decks/porches, yards).

We appeal to our representative, Mr. Gordan Mar, and those with whom he serves on the San Francisco Board of Supervisors, to stop this invasive, selfish, private serving project: the installation of lighting on the SI athletic field and field use for 150≠ nights a year.

Thank you for your time and consideration.

Most sincerely yours,

Denise Malmquist-Little

Mrs. Denise Malmquist-Little
3rd generation SF native and resident
Trustee: Malmquist Family
Retired Teacher (SFUSD, City College of San Francisco, and Archdiocese of San Francisco)

**From:** Debbie Montarano
**To:** Board of Supervisors (BOS); Mar, Gordon (BOS); Stefani, Catherine (BOS); Preston, Dean (BOS); Haney, Matt (BOS); MandelmanStaff, [BOS]; Walton, Shamann (BOS); Peskin, Aaron (BOS); Safai, Ahsha (BOS); Ronen, Hillary; Yee, Norman (BOS); Fewer, Sandra (BOS)
**Subject:** Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648
**Date:** Friday, September 11, 2020 10:48:16 AM

> This message is from outside the City email system. Do not open links or attachments from untrusted sources.

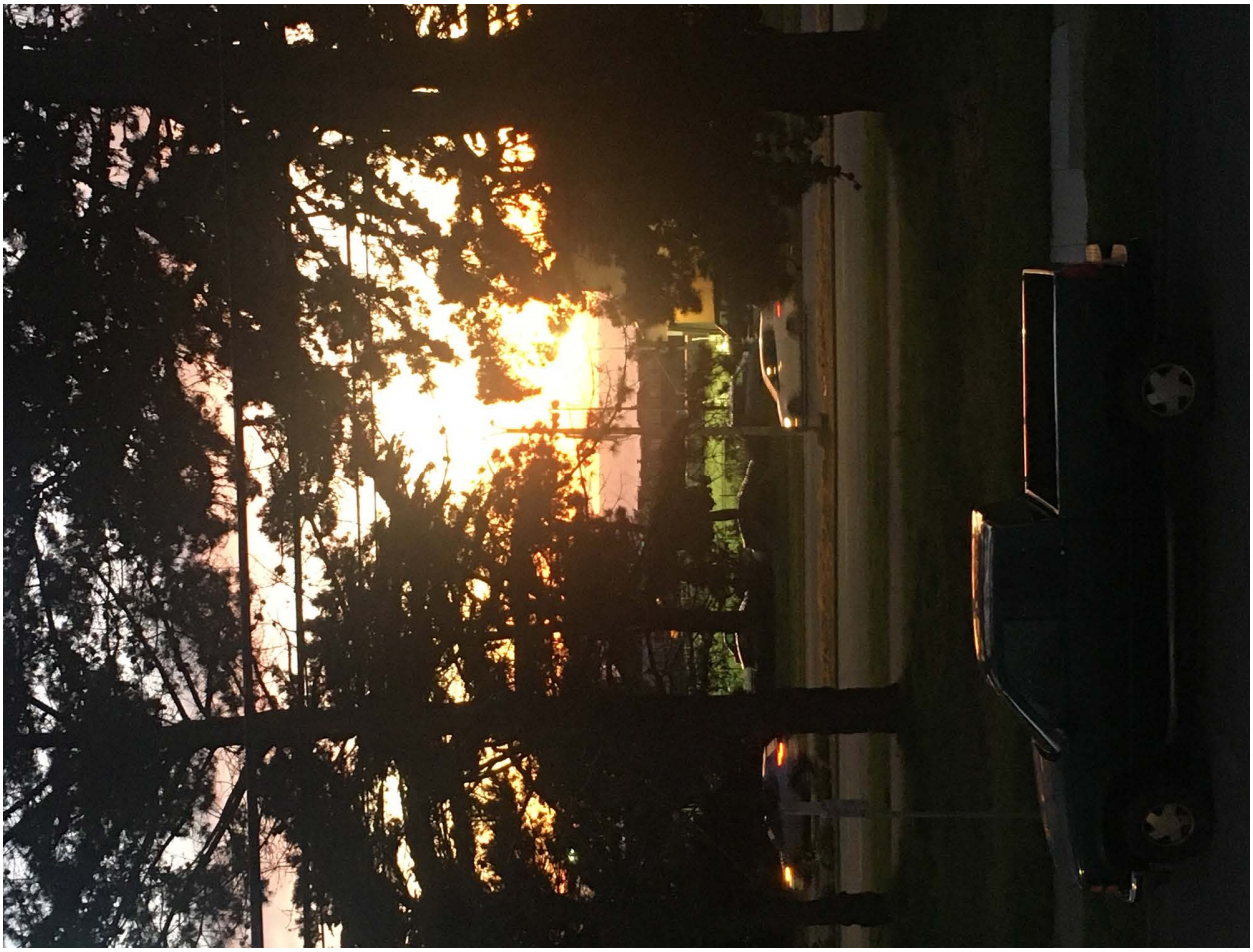
My name is Debbie Montarano and I live in the Sunset District at 2146-36th Ave and I am a member of the SI Neighborhood Association and support the appeals against the proposed Saint Ignatius Permanent Stadium Lights

We are against the lights at SI. We are against what affect this will have on our neighborhood. We are against lights being on for many hours after sunset many days of the year.

While it's true that many houses were bought after SI was here, the fact remains that when we bought, there was no practice field with lights on most nights until 8:00 and all practices and games were during daylight hours. I know that when girls joined the school it doubled the sports teams, but this greatly affects neighbors much farther than the surrounding blocks. In addition, SI rents out its fields to other groups and I'm sure that will become a more frequent practice when the field is accessible day and night.

I live on 36th Ave directly across from the practice field. This is an example of the view from my house when they brought in temporary lights last fall

And this is my usual view



And this is me in the middle of my house with all the lights off

I have nothing against SI.
My girls went there and got a great education.  I just don't want to have lights shining in my house and blocking my view of the ocean and sunset every night for practices and on weekends, possibly even during the summer if they rent out the field.

Please vote against lights at SI.

Debbie Montarano
SI neighbor

| | |
|---|---|
| **From:** | Board of Supervisors, (BOS) |
| **To:** | BOS-Supervisors |
| **Cc:** | BOS Legislation, (BOS) |
| **Subject:** | FW: HEARING NOTICE Proposed Project - 2001-37th Avenue - - SUPPORT Appeal of CEQA Exemption Determination/Conditional Use Authorization - Hearing - September 22, 2020 (File No. 200992) |
| **Date:** | Friday, September 11, 2020 8:40:11 AM |
| **Attachments:** | HS req CEQA EIRs.docx |

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**From:** D4ward SF <d4wardsf@gmail.com>
**Sent:** Thursday, September 10, 2020 11:15 AM
**To:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>; Peskin, Aaron (BOS) <aaron.peskin@sfgov.org>; Safai, Ahsha (BOS) <ahsha.safai@sfgov.org>; Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>; Preston, Dean (BOS) <dean.preston@sfgov.org>; Mar, Gordon (BOS) <gordon.mar@sfgov.org>; Ronen, Hillary <hillary.ronen@sfgov.org>; MandelmanStaff, [BOS] <mandelmanstaff@sfgov.org>; Haney, Matt (BOS) <matt.haney@sfgov.org>; Yee, Norman (BOS) <norman.yee@sfgov.org>; Fewer, Sandra (BOS) <sandra.fewer@sfgov.org>; Walton, Shamann (BOS) <shamann.walton@sfgov.org>
**Subject:** HEARING NOTICE Proposed Project - 2001-37th Avenue - - SUPPORT Appeal of CEQA Exemption Determination/Conditional Use Authorization - Hearing - September 22, 2020

> This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors,

D4ward is sending this email in support of the Appeal of 2001-37th Avenue CEQA Exemption Determination/Conditional Use Authorization - Hearing - September 22, 2020.

Sincerely,

Jeffrey Rigo
Corresponding Secretary, D4ward

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**From:** d4wardsf@gmail.com <d4wardsf@gmail.com>
**Sent:** Monday, July 20, 2020 7:12 PM
**To:** Commissions.Secretary@sfgov.org; jeffrey.horn@sfgov.org
**Cc:** joel.koppel@sfgov.org; kathrin.moore@sfgov.org; sue.diamond@sfgov.org; frank.fung@sfgov.org; theresa.imperial@sfgov.org; milicent.johnson@sfgov.org
**Subject:** PLANNING CASE NUMBER 2018-012648CUA - SAINT IGNATIUS STADIUM LIGHTING PROJECT

D4ward

***Sunset Rises to Action***
***www.facebook.com/D4wardSF***
***D4wardSF@gmail.com***

July 20, 2020

San Francisco Planning Commission
Planning Department, City and County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103

Re: PLANNING CASE NUMBER 2018-012648CUA - SAINT IGNATIUS STADIUM LIGHTING PROJECT

Mr. Jeff Horn, Senior Planner, Current Planning,

D4Ward has reviewed the materials on the proposed Saint Ignatius (SI) Stadium Lighting CUA proposal, and we have concerns regarding the impacts of these 90-ft tall permanent stadium lights and SI's planned usage of these lights for 200 nights a year and until 9-10 PM.

We join with the SI neighborhood community and share their legitimate concerns regarding the combined adverse effects of the project on nighttime light and glare, noise, traffic congestion and parking availability on the surrounding community. The school is located in a residential neighborhood with some homes only 90 feet away from their football field. The school is also adjacent to the Sunset Boulevard Greenbelt and the Sunset Community Garden.

These proposed Stadium Lights will be enormous -- four towers rising 90 ft high with light arrays atop measuring roughly the size of two dumpsters. These poles will not only be out of character with the residentially-based Sunset neighborhood, and will be an eyesore for many blocks around.

The SI Stadium Lighting project has received a CEQA exemption – and this exemption determination is incomplete and flawed. Specifically, a full EIR is needed to understand this project's impacts; including light/glare, traffic/parking studies, and noise study.

It is not uncommon, and in fact, standard practice for similar California high school stadium lighting projects to prepare an EIR and undergo a full CEQA review (see attached).

Saint Ignatius is an exclusive private school, its campus and facilities are closed for public use, has very few students from the neighborhood, and this project would only benefit the school to the permanent detriment of the Sunset neighborhood community. 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 athletic programs. Permanent stadium lights will clearly enhance Saint Ignatius' exclusive reputation and recruitment efforts. No other San Francisco high school has nighttime stadium lights and they are able to have vibrant and healthy sports programs without pushing their students until 9 – 10 pm.

Currently, after SI's classes and daytime 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 times in the SI adjacent neighborhood and they will be irrevocably disrupted -- significantly affecting the livability of the neighborhood.

In conclusion, the SI Stadium Lighting Project will, in no conceivable way, benefit the public or enhance the Sunset neighborhood or its character.

Sincerely,

Jeffrey Rigo
Corresponding Secretary

**Other similar projects have required CEQA EIRs**

a) San Marin High School prepared an EIR in response to neighbor concerns. The EIR was later rejected in a recent appellate court ruling which required the school district to prepare a revised draft EIR that includes an appropriate baseline, evaluation of aesthetics, analyzes the project in light of its cumulative impact related to other approved field lighting and future planned school changes, and light spillover, glare and skyglow.

b) San Diego's Hoover High School's project was also determined to require an EIR in appellate court.[i] The court found 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 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 adequate baseline figures for game attendance.

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.[ii]

d) Clayton Valley High School prepared an EIR and later a supplemental EIR for their stadium lighting project. The supplemental EIR noted: "*the reassigning of practices and games to the evening hours will affect traffic patterns and evening noise conditions*" and evaluated those project impacts.

e) Northgate High School prepared an EIR[iii] 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[iv] for their stadium lighting project which included a detailed noise study, among other evaluated impacts.

g) Marin Catholic High School withdrew their stadium lighting application based on the County Planning Department's comments which reflect our own 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, thus the only benefit is to the school.
2. The combined effects of the project related to the projected light and glare, noise, and traffic congestion would adversely affect the character of the surrounding community.
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.

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|---|---|
| **From:** | Board of Supervisors, (BOS) |
| **To:** | BOS Legislation, (BOS) |
| **Subject:** | FW: Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648 |
| **Date:** | Tuesday, September 8, 2020 1:24:07 PM |
| **Attachments:** | IMG_9200 (1).MOV |

Hello,

The email below with attachments is for File No. 200992.

Regards,

Jackie Hickey
Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA 94102-4689
Phone: (415) 554-5184 | Direct: (415) 554-7701
jacqueline.hickey@sfgov.org | www.sfbos.org

---

**From:** Josette Goedert <josette.goedert@gmail.com>
**Sent:** Tuesday, September 8, 2020 11:46 AM
**To:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
**Subject:** Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue CUA #2018-012648

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Board of Supervisors,

My name is Josette Goedert and I live in the Sunset District at 2837 Rivera Street and I support the SI Neighborhood Association appeals against the proposed Saint Ignatius Stadium Lights.

We have lived directly across from Saint Ignatius for 8 years now (39th and Rivera) and their level of consideration has gone significantly down. At first we were able to come home and enjoy our home on the weekends or evenings, but now it's almost out of question. Every single weekend they either have a game or have rented out their fields to external organizations such as pee-wee football, lacrosse, soccer, frisbee golf, all day activities or sports camps, etc. If we need to leave the house we know that we will not get parking anywhere near our home or have any peace and quiet. The events start early in the morning (sometimes blowing whistles and the loudspeaker on as early as 6:45 AM on a Saturday) to not ending until way past 4 or 5 PM in the evening. This goes on almost every weekend. Saint Ignatius also starts some practices Monday through Friday with whistles blowing again as early as 6:45 AM.

We've had our driveway blocked so many times that we have resorted to calling SFMTA to issue tickets because we have no other choice. I personally have had SI parents blatantly ask me if I was going anywhere "anytime soon", so that they could illegally block my driveway because they were late for an event at the school and they couldn't find close parking. I had to let those parents know that if they remained parked in my driveway that I would tow them and that it didn't matter if I had anywhere to go - I need access to my car in the garage. I have called the school several times to get their students to move their cars out of my driveway or out of my neighbors driveway. Anytime I have politely asked a student to move their vehicle 9 times out of 10 they have argued with me and then I tell them that they can get their car out of the impound if they park there. They then move their vehicles out of my driveway. I have included a photo of their student's vehicle in my driveway from May 5th, 2015. When I called the school and SFMTA - the student arrived just before SFMTA did and moved their vehicle. On this particular occasion I was significantly late for a meeting that day due to their student parking in my driveway and I told the SI office that, but they didn't seem to care, but only offered the rebuttal of "the student's know the rules and we had them move their vehicle."

On weekends it's worse because the people who come from outside the city never obey the red on the driveway. We had a pickup truck park in between my driveway and our neighbors (mind you a Prius can fit there, but nothing bigger). I then had to argue with the driver to move his truck and he told me that he was late for his son's football game and I had to let him know that his truck would be in the impound if he didn't move it. Almost every week and weekend I have to let someone know to not park in my driveway. The last time I called SFMTA was last November on a weekend and the driver argued with SFMTA for giving them a ticket. Due to Covid this year we have not had to call or let someone know to not park in our driveway.

When Saint Ignatius had their temporary lights up last year they were shining directly into our home. We could turn the lights off in our house and have it still be illuminated brightly. SI did not turn the lights off when they were supposed to and sometimes they stayed on for at least another hour after they were supposed to be turned off. This would be as late as 10 PM some nights. The level of consistent noise from the loud speaker is blaring. I have included a video from their practice on June 15, 2020 at 4:05 PM. This is a small example of how loud it is, but please note it's much louder for games and for all day weekend events and games.

Overall, SI isn't a good neighbor and now that we have a 1 year old daughter - I would like to be able to keep her naptime and bedtime routine without consistent noise, crowds, loud speakers and bright lights. Saint Ignatius has not taken into consideration how this will affect the small children in the community when the lights won't go off until late shining directly into their bedrooms. Having the lights be used for up to 150 nights per year is absolutely ludicrous and in the end potentially causes our child's nighttime routine to be drastically changed. They have not taken into consideration how the small children in the neighborhood would be affected by their NON-ESSENTIAL 90 foot lights. The SF Planning's yes vote has shown our community that the city favors Saint Ignatius and their students that pay an exorbitant amount of tuition for a project that doesn't directly affect their education, but negatively affects the Outer Sunset. The Saint Ignatius students and parents do not have to live with these lights and 5G technology across from their homes. They will drive home, which is mostly outside of San Francisco city limits.

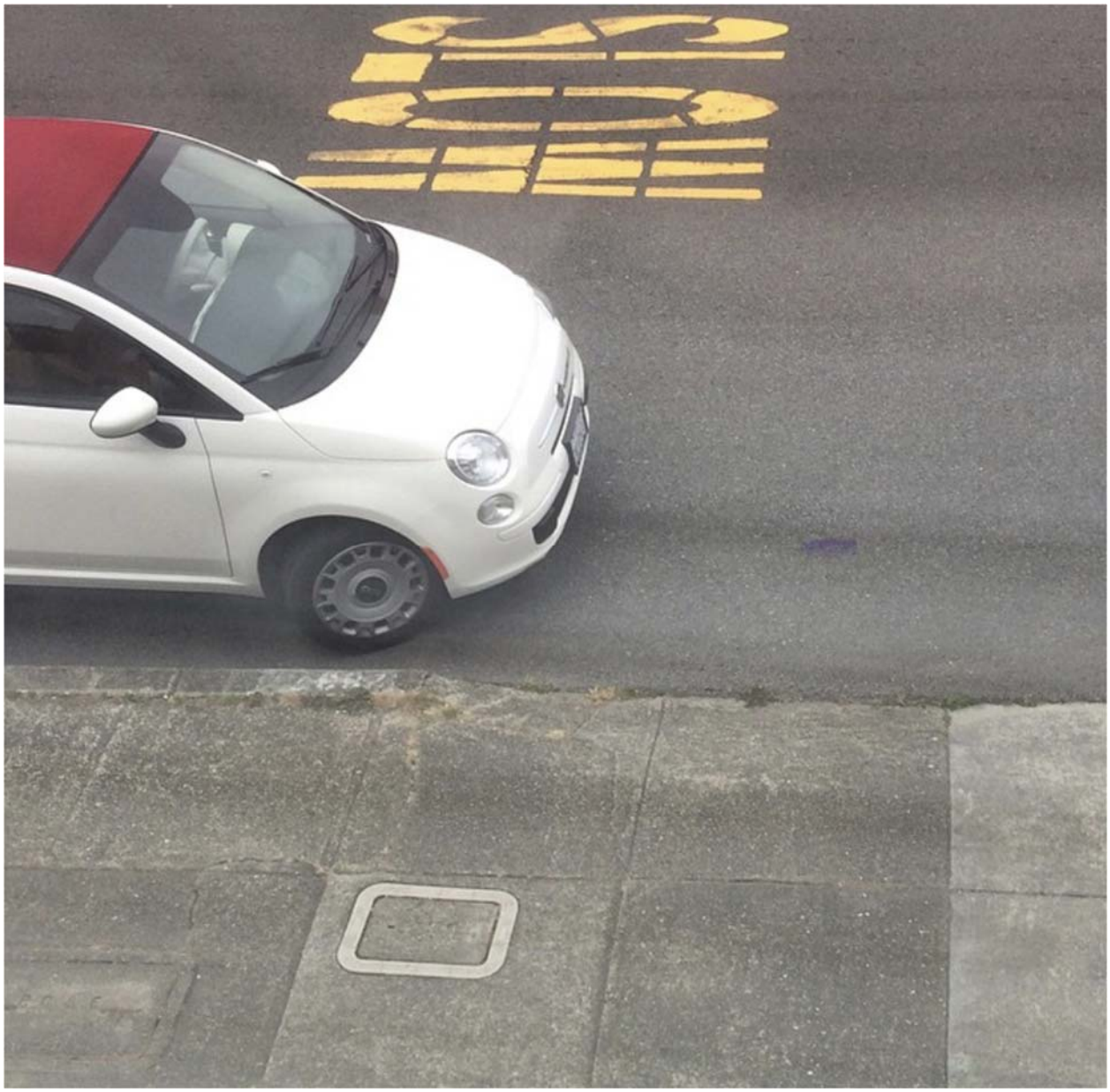
Please note the negative effects on our neighborhood, especially those living directly across the street:

- These lights will be enormous (90 feet!) / out of character for our residential neighborhood and will be shining directly into our windows
- If the lights are built - enforcement of SF Planning's rules is left up to the neighbors to report
- SI was granted the permit without any environmental, parking or health studies to prove that this project should not move forward
- SI will not engage with the neighbors to discuss our concerns and have flat out refused to hear our alternatives / the complete opposite of what they tout themselves as "Good Neighbor Program"
- Extending the activities to late evening will further compound the issues we already have to endure every weekend from SI and will now be Monday through Sunday - this is not okay!
- These lights will permanently alter the livability of our Sunset neighborhood

Please note that it remains beneficial to preserve the family oriented environment that has been developing over the years for young families here in the Outer Sunset. I cannot in good conscience find anything positive with their proposal for 90 foot lights, up to 150 nights a year field usage and 5G technology. Saint Ignatius likes to tout themselves as good neighbors, but they are anything but that. PLEASE VOTE NO.

Best,

Josette



| | |
|---|---|
| **From:** | BOS Legislation, (BOS) |
| **To:** | mwgraf@aol.com; sisunsetneighbors@hotmail.com; kstupi@siprep.org; chad.christie@ridgecommunicate.com |
| **Cc:** | Storrs, Bruce (DPW); Tse, Bernie (DPW); Rivera, Javier (DPW); Duran, Vanessa (DPW); Wong, Jason (DPW); PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Varat, Adam (CPC); Rodgers, AnMarie (CPC); Navarrete, Joy (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Horn, Jeffrey (CPC); Rosenberg, Julie (BOA); Sullivan, Katy (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS) |
| **Subject:** | HEARING NOTICE - Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue - Hearing - September 22, 2020 |
| **Date:** | Tuesday, September 8, 2020 9:28:03 AM |
| **Attachments:** | image001.png |

Greetings,

The Office of the Clerk of the Board has scheduled remote hearings for Special Order before the Board of Supervisors on **September 22, 2020, at 3:00 p.m**., to hear an appeal of CEQA Exemption Determination and Conditional Use Authorization, for the proposed 2001-37th Avenue project.

**Please find the following link to the hearing notice for the matter:**

Public Hearing Notice - September 8, 2020

The President may entertain a motion to continue this Hearing to a future Board of Supervisors meeting date, to be determined. Public Comment will be taken on the continuance only.

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 200992 - CEQA Appeal
Board of Supervisors File No. 200996 - CU Appeal

Best regards,
***Jocelyn Wong***
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T: 415.554.7702 | F: 415.554.5163
jocelyn.wong@sfgov.org | www.sfbos.org

**(VIRTUAL APPOINTMENTS)** To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.

*Due to the current COVID-19 health emergency and the Shelter in Place Order, the Office of the Clerk of the Board is working remotely while providing complete access to the legislative process and our services*

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BOARD of SUPERVISORS

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Tel. No. 554-5184
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# NOTICE OF PUBLIC HEARING

## BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN FRANCISCO
**Sent via Email and/or U.S. Postal Service**

NOTICE IS HEREBY GIVEN THAT the Board of Supervisors of the City and County of San Francisco will hold a remote public hearing to consider the following appeal and said public hearing will be held as follows, at which time all interested parties may attend and be heard:

| | |
|---|---|
| **NOTE:** | **The President may entertain a motion to continue this Hearing to a future Board of Supervisors meeting date to be determined. Public Comment will be taken on the continuance only.** |

**Date:** **Tuesday, September 22, 2020**

**Time:** **3:00 p.m.**

**Location:** **REMOTE MEETING VIA VIDEOCONFERENCE**
**Watch: www.sfgovtv.org**

**Watch:** **SF Cable Channel 26, 78 or 99 (depending on provider) once the meeting starts, the telephone number and Meeting ID will be displayed on the screen.**
**Public Comment Call-In: https://sfbos.org/remote-meeting-call**

**Subject:** **File No. 200992.** Hearing of persons interested in or objecting to the determination of exemption from environmental review under the California Environmental Quality Act issued as a Categorical Exemption by the Planning Department, for the proposed project at 2001-37th Avenue, Assessor's Parcel Block No. 2094, Lot No. 006; to permit the addition of new stadium lights on an existing football field at St. Ignatius College Preparatory, to propose a lighting system at the J.B. Murphy Field athletic stadium to allow for evening use and a Verizon macro wireless telecommunications services (WTS) facility consisting of nine panel antennas that will be screened; to construct four 90 foot tall poles with LED light fixtures and the north-west pole would include the WTS facility and ancillary equipment with installation of each pole requiring up to approximately 30 feet of excavation below ground surface, resulting in a total of approximately 60 cubic yards of soil disturbance. (District 4) (Appellants: Michael Graf of Michael W. Graf Law Offices, on behalf of Saint Ignatius Neighborhood Association (SINA)) (Filed August 24, 2020)

DATED ~ MAILED ~ EMAILED ~ POSTED: September 8, 2020

**File No. 200996.** Hearing of persons interested in or objecting to the approval of a Conditional Use Authorization pursuant to Sections 209.1, 303, and 304 of the Planning Code, for the proposed project at 2001-37th Avenue, Assessor's Parcel Block No. 2094, Lot No. 006, to amend an existing planned unit development and allow a modification to the requirements for rear yard for the expansion of a private secondary school through the addition of four 90-foot tall light standards to the J.B. Murphy Field Athletic Stadium and to install a new Verizon macro wireless telecommunications service facility attached to the northwest light standard within the RH-1 (Residential-House, One Family) Zoning District and a 40-X Height and Bulk District. (District 4) (Appellant: Deborah Brown, on behalf of Saint Ignatius Neighborhood Association (SINA)) (Filed August 21, 2020)

On March 17, 2020, the Board of Supervisors authorized their Board and Committee meetings to convene remotely and allow for remote public comment due to the Coronavirus -19 pandemic. Therefore, Board of Supervisors meetings that are held through videoconferencing will allow remote public comment. Visit the SFGovTV website (www.sfgovtv.org ) to stream the live meetings or watch them on demand.

**PUBLIC COMMENT CALL-IN**
**WATCH:** SF Cable Channel 26, 78 or 99 *(depending on provider)* once the meeting starts, and the telephone number and Meeting ID will be displayed on the screen; or
**VISIT: https://sfbos.org/remote-meeting-call**

Please visit the Board's website (https://sfbos.org/city-board-response-covid-19) regularly to be updated on the City's response to COVID-19 and how the legislative process may be impacted.

In accordance with Administrative Code, Section 67.7-1, persons who are unable to attend the hearing on this matter may submit written comments prior to the time the hearing begins. These comments will be made as part of the official public record in this matter and shall be brought to the attention of the Board of Supervisors. Written comments should be addressed to Angela Calvillo, Clerk of the Board, City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA, 94102 or sent via email (bos@sfgov.org). Information relating to this matter is available in the Office of the Clerk of the Board or the Board of Supervisors' Legislative Research Center (https://sfbos.org/legislative-research-center-lrc). Agenda information relating to this matter will be available for public review on Friday, September 18, 2020.

DATED ~ MAILED ~ EMAILED ~ POSTED: September 8, 2020

For any questions about this hearing, please contact one of the Legislative Clerks:

Lisa Lew (lisa.lew@sfgov.org ~ (415) 554-7718)
Jocelyn Wong (jocelyn.wong@sfgov.org ~ (415) 554-7702)

***Please Note:*** *The Department is open for business, but employees are working from home. Please allow 48 hours for us to return your call or email.*

Angela Calvillo
Clerk of the Board of Supervisors
City and County of San Francisco

ll:jw:ams

DATED ~ MAILED ~ EMAILED ~ POSTED: September 8, 2020

BOARD of SUPERVISORS

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1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 554-5227

# PROOF OF MAILING

Legislative File No. 200992

Description of Items: Hearing - Appeal of Determination of Exemption From Environmental Review - Proposed 2001-37th Avenue Project - 232 Notices Mailed

I, Lisa Lew, an employee of the City and County of San Francisco, mailed the above described document(s) by depositing the sealed items with the United States Postal Service (USPS) with the postage fully prepaid as follows:

Date: September 8, 2020

Time: 3:30 p.m.

USPS Location: Repro Pick-up Box in the Clerk of the Board's Office (Rm 244)

Mailbox/Mailslot Pick-Up Times (if applicable): N/A

Signature: _____

Instructions: Upon completion, original must be filed in the above referenced file.

| | |
|---|---|
| **From:** | BOS Legislation, (BOS) |
| **To:** | Ko, Yvonne (CPC); Yeung, Tony (CPC) |
| **Cc:** | BOS-Operations; BOS Legislation, (BOS) |
| **Subject:** | CHECK PICKUP: Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue - Hearing - September 22, 2020 |
| **Date:** | Friday, September 4, 2020 1:28:12 PM |
| **Attachments:** | image001.png<br>Appeal Check Pickup.doc<br>Appeal Check Pickup.doc |

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Hi Yvonne,

The checks for the appeal filing fee for the CEQA Exemption Determination and Conditional Use Authorization appeal of the proposed 2001 37th Avenue project, is ready to be picked up at the Clerk's Office. Please coordinate with our BOS-Operations team, copied here, to set up a date and time for pickup. Fee waivers were filed with these projects.

Ops,
These checks should be in your possession currently. Please have Planning sign the attached pick up forms and scan it back to the leg clerks when completed.

Thank you.

**Lisa Lew**
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org

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---

**From:** BOS Legislation, (BOS) <bos.legislation@sfgov.org>
**Sent:** Wednesday, September 2, 2020 9:34 PM
**To:** mwgraf@aol.com; sisunsetneighbors@hotmail.com
**Cc:** Storrs, Bruce (DPW) <Bruce.Storrs@sfdpw.org>; Tse, Bernie (DPW) <bernie.tse@sfdpw.org>;

Rivera, Javier (DPW) <Javier.Rivera@sfdpw.org>; Duran, Vanessa (DPW) <vanessa.duran@sfdpw.org>; Wong, Jason (DPW) <jason.c.wong1@sfdpw.org>; PEARSON, ANNE (CAT) <Anne.Pearson@sfcityatty.org>; STACY, KATE (CAT) <Kate.Stacy@sfcityatty.org>; JENSEN, KRISTEN (CAT) <Kristen.Jensen@sfcityatty.org>; RUIZ-ESQUIDE, ANDREA (CAT) <Andrea.Ruiz-Esquide@sfcityatty.org>; Hillis, Rich (CPC) <rich.hillis@sfgov.org>; Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Jain, Devyani (CPC) <devyani.jain@sfgov.org>; Varat, Adam (CPC) <adam.varat@sfgov.org>; Rodgers, AnMarie (CPC) <anmarie.rodgers@sfgov.org>; Navarrete, Joy (CPC) <joy.navarrete@sfgov.org>; Teague, Corey (CPC) <corey.teague@sfgov.org>; Sanchez, Scott (CPC) <scott.sanchez@sfgov.org>; Sider, Dan (CPC) <dan.sider@sfgov.org>; Starr, Aaron (CPC) <aaron.starr@sfgov.org>; Omokaro, Ify (MTA) <Ify.Omokaro@sfmta.com>; Horn, Jeffrey (CPC) <jeffrey.horn@sfgov.org>; Rosenberg, Julie (BOA) <julie.rosenberg@sfgov.org>; Sullivan, Katy (BOA) <katy.sullivan@sfgov.org>; Longaway, Alec (BOA) <alec.longaway@sfgov.org>; BOS-Supervisors <bos-supervisors@sfgov.org>; BOS-Legislative Aides <bos-legislative_aides@sfgov.org>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; Somera, Alisa (BOS) <alisa.somera@sfgov.org>; Mchugh, Eileen (BOS) <eileen.e.mchugh@sfgov.org>; BOS Legislation, (BOS) <bos.legislation@sfgov.org>
**Subject:** Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue - Hearing - September 22, 2020

Greetings,

The Office of the Clerk of the Board has scheduled for remote hearings for Special Order before the Board of Supervisors on September 22, 2020, at 3:00 p.m. to hear the appeals of the Exemption Determination under CEQA and Conditional Use Authorization for a proposed project at 2001-37th Avenue.

Please find linked below letters of appeal regarding the proposed 2001-37th Avenue project, as well as direct links to the Planning Department's timely filing determination, Public Works' determination, and an informational letter from the Clerk of the Board.

CEQA Appeal Letter - August 24, 2020
CU Appeal Letter – August 21, 2020
Planning Department Memo – September 2, 2020
Public Works Memo – September 1, 2020
Clerk of the Board Letter - September 2, 2020

Please note, the President may entertain a motion to continue this Hearing to a future Board of Supervisors meeting date to be determined. Public Comment will be taken on the continuance only.

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 200992
Board of Supervisors File No. 200996

Best regards,

***Jocelyn Wong***
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T: 415.554.7702 | F: 415.554.5163
jocelyn.wong@sfgov.org | www.sfbos.org

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September 4, 2020

**File Nos. 200992-200995**
**Planning Case No. 2018-012648ENV**

Received from the Board of Supervisors Clerk's Office one check, in the amount of Six Hundred Forty Dollars ($640), representing the filing fee paid by Deborah Brown, on behalf of Saint Ignatius Neighborhood Association for the appeal of the Exemption Determination under CEQA for the proposed 2001 37th Avenue project:

**Planning Department**
**By:**

Tony Yeung
Print Name

9/4/20
Signature and Date

| | |
|---|---|
| **From:** | BOS Legislation, (BOS) |
| **To:** | mwgraf@aol.com; sisunsetneighbors@hotmail.com |
| **Cc:** | Storrs, Bruce (DPW); Tse, Bernie (DPW); Rivera, Javier (DPW); Duran, Vanessa (DPW); Wong, Jason (DPW); PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Varat, Adam (CPC); Rodgers, AnMarie (CPC); Navarrete, Joy (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Omokaro, Ify (MTA); Horn, Jeffrey (CPC); Rosenberg, Julie (BOA); Sullivan, Katy (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS) |
| **Subject:** | Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project - 2001-37th Avenue - Hearing - September 22, 2020 |
| **Date:** | Wednesday, September 2, 2020 9:34:32 PM |
| **Attachments:** | image001.png |

Greetings,

The Office of the Clerk of the Board has scheduled for remote hearings for Special Order before the Board of Supervisors on September 22, 2020, at 3:00 p.m. to hear the appeals of the Exemption Determination under CEQA and Conditional Use Authorization for a proposed project at 2001-37th Avenue.

Please find linked below letters of appeal regarding the proposed 2001-37th Avenue project, as well as direct links to the Planning Department's timely filing determination, Public Works' determination, and an informational letter from the Clerk of the Board.

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CU Appeal Letter – August 21, 2020
Planning Department Memo – September 2, 2020
Public Works Memo – September 1, 2020
Clerk of the Board Letter - September 2, 2020

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I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 200992
Board of Supervisors File No. 200996

Best regards,
***Jocelyn Wong***
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jocelyn.wong@sfgov.org | www.sfbos.org

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ask and I can answer your questions in real time.

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**TDD/TTY No. 554-5227**

September 2, 2020

Michael Graf
Michael W. Graf Law Offices
227 Behrens Street
El Cerrito, CA 94530

Deborah Brown
Saint Ignatius Neighborhood Association
2151 39th Avenue
San Francisco, CA 94116

**Subject: File Nos. 200992 and 200996 - Appeal of CEQA Exemption Determination and Conditional Use Authorization - Proposed Project at 2001-37th Avenue**

Dear Mr. Graf and Ms. Brown,

The Office of the Clerk of the Board is in receipt of a memorandum dated September 2, 2020, from the Planning Department regarding their determination on the timely filing of appeal of the CEQA Exemption Determination for the proposed project at 2001-37th Avenue.

The Planning Department has determined that the appeal was filed in a timely manner (copy attached).

The appeal filing period for the Conditional Use approval for the proposed project at 2001-37th Avenue closed on August 24, 2020.

The City and County Surveyor has informed the Board of Supervisors in a letter received September 1, 2020, (copy attached), that the signatures represented with your appeal filing on August 21, 2020, have been checked pursuant to the Planning Code, and represent owners of more than 20% of the property involved and are sufficient for an appeal.

In accordance with Mayor London N. Breed's Twenty-Second Supplement to the Declaration of the Emergency that provides the Board until September 30, 2020, to schedule all initial hearings for appeals filed during this health emergency, Administrative Code, Section 31.16, and Planning Code, Section 308.1, a remote initial hearing date has been scheduled for **September 22, 2020, at 3:00 p.m.**, at the Board of Supervisors meeting.

Please note, the President of the Board of Supervisors may entertain a motion to continue this Hearing to a future Board of Supervisors meeting date to be determined. Public comment will be taken on the continuance only.

Continues on Next Page

Please provide to the Clerk's Office as soon as possible, names and addresses of interested parties to be notified of the hearing, in spreadsheet format. If there is supporting documentation you wish to include for the hearing, please email an electronic copy by Thursday, September 17, 2020, at 12:00 noon to bos.legislation@sfgov.org. Any materials received after this date, will still be distributed to all parties and be included as part of the official file.

If you have any questions, please feel free to contact Legislative Clerks, Lisa Lew, at (415) 554-7718, Jocelyn Wong, at (415) 554-7702, or Brent Jalipa, at (415) 554-7712.

Very truly yours,

Angela Calvillo
Clerk of the Board

ll:jw:ams

c: Bruce Storrs, Public Works
Bernie Tse, Public Works
Javier Rivera, Public Works
Vanessa Duran, Public Works
Jason Wong, Public Works
Anne Pearson, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Kristen Jensen, Deputy City Attorney
Lisa Gibson, Planning Department
Devyani Jain, Planning Department
Adam Varat, Planning Department
AnMarie Rodgers, Planning Department
Joy Navarette, Planning Department
Corey Teague, Planning Department
Scott Sanchez, Planning Department
Dan Sider, Planning Department
Aaron Starr, Planning Department
Jonas Ionin, Planning Commission
Jeff Horn, Planning Department
Julie Rosenberg, Board of Appeals
Katy Sullivan, Board of Appeals
Alec Longaway, Board of Appeals

San Francisco Planning

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San Francisco, CA 94103
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# Categorical Exemption Appeal Timeliness Determination

**DATE:** **September 2, 2020**

**TO:** **Angela Calvillo, Clerk of the Board of Supervisors**

**FROM:** **Lisa Gibson, Environmental Review Officer**

**RE:** **CEQA Appeal Timeliness Determination – 2001 37th Avenue Categorical Exemption; Planning Department Case No. 2018-012648ENV**

On August 24, 2020, Michael Graf of Michael W. Graf Law Offices, on behalf of Saint Ignatius Neighborhood Association (SINA), filed an appeal with the Office of the Clerk of the Board of Supervisors of the categorial exemption for the proposed project at 2001 37th Avenue. As explained below, the appeal is timely.

| Date of Approval Action | 30 Days after Approval Action/Appeal Deadline | Appeal Deadline (Must Be Day Clerk of Board's Office Is Open) | Date of Appeal Filing | Timely? |
|---|---|---|---|---|
| Thursday, July 23, 2020 | Saturday, August 22, 2020 | Monday, August 24, 2020 | Monday, August 24, 2020 | Yes |

**Approval Action:** On June 3, 2020, the planning department issued a categorical exemption for the proposed project. The approval action for the project was approval of the conditional use authorization by the planning commission. On July 23, 2020, the planning commission approved the conditional use authorization.

**Appeal Deadline:** Sections 31.16(a) and (e) of the San Francisco Administrative Code state that any person or entity may appeal an exemption determination to the Board of Supervisors during the time period beginning with the date of the exemption determination and ending 30 days after the date of the approval action. The 30th day after the date of the approval action was Saturday, August 22, 2020. The next day when the Office of the Clerk of the Board of Supervisors was open was Monday, August 24, 2020 (appeal deadline).

**Appeal Filing and Timeliness:** The appellant filed the appeal of the exemption determination on Monday, August 24, 2020, prior to the end of the appeal deadline. Therefore, the appeal is timely.

| | |
|---|---|
| **From:** | BOS Legislation, (BOS) |
| **To:** | Hillis, Rich (CPC) |
| **Cc:** | PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); Teague, Corey (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Navarrete, Joy (CPC); Lewis, Don (CPC); Varat, Adam (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Ionin, Jonas (CPC); Lynch, Laura (CPC); Horn, Jeffrey (CPC); Rosenberg, Julie (BOA); Sullivan, Katy (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS) |
| **Subject:** | Appeal of CEQA Exemption Determination - Proposed Project - 2001-37th Avenue - Timeliness Determination |
| **Date:** | Thursday, August 27, 2020 9:42:42 PM |
| **Attachments:** | image001.png<br>CEQA Appeal Ltr 082420.pdf<br>COB Ltr 082720 - CEQA Req for Determination.pdf |

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Dear Director Hillis,

The Office of the Clerk of the Board is in receipt of an appeal of the CEQA Exemption Determination for the proposed project at 2001-37th Avenue. The appeal was filed by Michael Graf of Michael W. Graf Law Offices, on behalf of Saint Ignatius Neighborhood Association (SINA).

Please find the attached letter of appeal and timely filing determination request letter from the Clerk of the Board.

Kindly review for timely filing determination.

Regards,

**Lisa Lew**
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org

**(VIRTUAL APPOINTMENTS)** To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.
*Due to the current COVID-19 health emergency and the Shelter in Place Order, the Office of the Clerk of the Board is working remotely while providing complete access to the legislative process and our services.*

Click here to complete a Board of Supervisors Customer Service Satisfaction form

The Legislative Research Center provides 24-hour access to Board of Supervisors legislation, and archived matters since August 1998.

***Disclosures:*** *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.*

BOARD of SUPERVISORS

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TDD/TTY No. 554-5227

**August 27, 2020**

To: Rich Hillis
Planning Director

From: Angela Calvillo
Clerk of the Board of Supervisors

**Subject: Appeal of California Environmental Quality Act (CEQA) Determination of Exemption from Environmental Review - 2001-37th Avenue**

As you know, in response to the challenges posed during this health emergency, we have been working diligently the last several months to stabilize the remote meeting system and establish processes to execute efficient, complex hearings at the Board of Supervisors. Now that we have reached confidence in the remote meeting system, we are resuming scheduling of the appeal queue. In order to alleviate deadline concerns due to the sizable queue, Mayor London N. Breed issued the Twenty-Second Supplement to the Declaration of the Emergency that provides the Board until September 30, 2020, to schedule all of the initial hearings for pending appeals. Upon receipt of your determination, we will move forward accordingly and schedule a hearing within the timeframe if it is deemed to have been filed timely.

An appeal of the CEQA Determination of Exemption from Environmental Review for the proposed project at 2001-37th Avenue was filed with the Office of the Clerk of the Board on August 24, 2020, by Michael Graf of Michael W. Graf Law Offices, on behalf of Saint Ignatius Neighborhood Association (SINA).

Pursuant to Administrative Code, Chapter 31.16, I am forwarding this appeal, with attached documents, to the Planning Department to determine if the appeal has been filed in a timely manner.

If you have any questions, please feel free to contact Legislative Clerks Lisa Lew at (415) 554-7718, Jocelyn Wong at (415) 554-7702 or Brent Jalipa at (415) 554-7712.

c: Anne Pearson, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Kristen Jensen, Deputy City Attorney
Corey Teague, Zoning Administrator, Planning Department
Scott Sanchez, Acting Deputy Zoning Administrator, Planning Department
Lisa Gibson, Environmental Review Officer, Planning Department
Devyani Jain, Deputy Environmental Review Officer, Planning Department
Joy Navarette, Environmental Planning, Planning Department
Don Lewis, Environmental Planning, Planning Department
Adam Varat, Acting Director of Citywide Planning, Planning Department
Dan Sider, Director of Executive Programs, Planning Department
Aaron Starr, Manager of Legislative Affairs, Planning Department
Jonas Ionin, Planning Commission Secretary, Planning Department
Laura Lynch, Staff Contact, Planning Department
Jeff Horn, Staff Contact, Planning Department
Julie Rosenberg, Executive Director, Board of Appeals
Katy Sullivan, Legal Assistant, Board of Appeals
Alec Longaway, Legal Process Clerk, Board of Appeals

Print Form

# Introduction Form

By a Member of the Board of Supervisors or Mayor

Time stamp
or meeting date

I hereby submit the following item for introduction (select only one):

- ☐ 1. For reference to Committee. (An Ordinance, Resolution, Motion or Charter Amendment).
- ☐ 2. Request for next printed agenda Without Reference to Committee.
- ☑ 3. Request for hearing on a subject matter at Committee.
- ☐ 4. Request for letter beginning :"Supervisor _____ inquiries"
- ☐ 5. City Attorney Request.
- ☐ 6. Call File No. _____ from Committee.
- ☐ 7. Budget Analyst request (attached written motion).
- ☐ 8. Substitute Legislation File No. _____
- ☐ 9. Reactivate File No. _____
- ☐ 10. Topic submitted for Mayoral Appearance before the BOS on _____

Please check the appropriate boxes. The proposed legislation should be forwarded to the following:

☐ Small Business Commission ☐ Youth Commission ☐ Ethics Commission

☐ Planning Commission ☐ Building Inspection Commission

**Note: For the Imperative Agenda (a resolution not on the printed agenda), use the Imperative Form.**

Sponsor(s):

Clerk of the Board

Subject:

Hearing - Appeal of Determination of Exemption From Environmental Review - Proposed 2001-37th Avenue Project

The text is listed:

Hearing of persons interested in or objecting to the determination of exemption from environmental review under the California Environmental Quality Act issued as a Categorical Exemption by the Planning Department, for the proposed project at 2001-37th Avenue, Assessor's Parcel Block No. 2094, Lot No. 006; to permit the addition of new stadium lights on an existing football field at St. Ignatius College Preparatory, to propose a lighting system at the J.B. Murphy Field athletic stadium to allow for evening use and a Verizon macro wireless telecommunications services (WTS) facility consisting of nine panel antennas that will be screened; to construct four 90 foot tall poles with LED light fixtures and the north-west pole would include the WTS facility and ancillary equipment with installation of each pole requiring up to approximately 30 feet of excavation below ground surface, resulting in a total of approximately 60 cubic yards of soil disturbance. (District 4) (Appellants: Michael Graf of Michael W. Graf Law Offices, on behalf of Saint Ignatius Neighborhood Association (SINA)) (Filed August 24, 2020)

Signature of Sponsoring Supervisor: _____

For Clerk's Use Only