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Re: Comments to the Draft Environmental Impact Report (DEIR) For Hoover High School Athletic Facilities Upgrades Project

Ms. Kathie Washington,

The following is Taxpayers For Accountable School Bond Spending input of what should be addressed in the subject Draft Environmental Impact Report. Also, please include all of the supportive data including comment letters from the previous Final Mitigated Negative Declaration. All are relevant to the DEIR. This information is currently posted on the District website at this location: <http://www.sandi.net/page/948>

- Final Mitigate Negative Declaration
- Attachment 1 - Mitigation Monitoring & Reporting Program
- Attachment 2a - Response to Comments
- Attachment 2b - Attachment to Comment Letter G – Binder of Supportive Data
- Technical Appendices

**Page ES-1, first paragraph:**

The DEIR incorrectly states that the EIR is founded in part on the analyses supporting the MND. The Appellate Court ruling is clear. The district must vacate the MND and conduct an EIR. No additional trial court or appellate court determinations play a role in the development of the EIR. An EIR stands on its own. Several things have changed since the initial studies were conducted in support of the MND. The following are just a few:

- 1) The lights have been installed and were used for the entire 2012-2013 school year for football and soccer. The lights were also used in the first 2 football home games of the 2013-2014 school year.
- 2) Actual operational data from night events was available to collect and include in the DEIR.

That being said, why are you not adhering to the appellate court decision and vacating the MND and conducting a 'full' EIR? Refer to the Appellate Court Published Ruling here: <http://www.courts.ca.gov/opinions/archive/D060999.PDF>

From the Appellate Court Decision:

### *DISPOSITION*

*The judgment is reversed to the extent it dismissed the first and second causes of action; in all other respects, the judgment is affirmed. The matter is remanded with directions that the superior court grant the petition for writ of mandate and issue the injunctive and declaratory relief sought in the first and second causes of action of the first amended complaint and petition, to the extent consistent with this opinion, including, but not limited to, (1) ordering District to vacate its approval of the Project and the mitigated negative declaration (MND) and to cause an EIR to be prepared, and (2) enjoining District from using Proposition S bond proceeds to pay for field lighting at Hoover's stadium and any other high school stadium for which Proposition S did not specifically list field lighting as part of their projects. Taxpayers shall recover its costs of appeal.*

### **Page ES-1, second paragraph:**

The upgraded stadium isn't what allows evening events; it was the installation of permanent field lighting that facilitated that. The upgraded stadium, for ADA and code compliance, allowed for safe field play and accommodates those with disabilities to attend or participate in field activities.

### **Page ES-2, fourth paragraph:**

It is stated in this paragraph that only Noise has been identified as a significant and unavoidable operational impact and that no other issue areas were determined to be significant or no impact was identified. Within this report I see noise studies where actual measurements were taken during a night football game yet nowhere do I find any actual field lighting measurements taken. Many comments were submitted to the EIR Scoping reporting that the lighting impact did not match the lighting study conducted by the district. The lighting studies that were conducted by the district were done with vendor supplied specifications only. Even though in the 2012-2013 school year there were 6 night football games played and 4 night soccer games played, no-one took actual measurements of the As-Built condition of the field lighting. Even after the Appellate Court Ruling on Mar 26, 2013 which required the District to vacate the MND and conduct an EIR, there were still opportunities for the District to obtain As-Built lighting measurements this year but the District decided to do nothing. If As-Built lighting measurements were taken, they were not included in the DEIR. Please let the public know why these measurements were not taken and if taken, why they were not included in the lighting

study. Even though there were many e-mails sent to the school principal and post event reports generated, consolidated, and then sent to the district, Board of Education, and school Superintendent after each football game making the school and district aware of lighting impact issues, nothing was done. Refer to the Post Event Reports at this link:

[http://www.tfasbs.org/uploads/Football Season 2012 Post Event Reports.pdf](http://www.tfasbs.org/uploads/Football_Season_2012_Post_Event_Reports.pdf) Some of those submitting complaints do not even live adjacent to the school; they live across the canyons from the Hoover field in the greater part of Talmadge and Kensington. To clarify - those living near and far from the Hoover football field are significantly impacted by noise and field lighting. Why weren't 'as-built' lighting measurements included in the DEIR?

I submit for the record an independent lighting report that was developed from data collected on Sept 6<sup>th</sup>, 2013 during the first night football game of the 2013 season by a world renowned expert in the area of lighting, Mr. James Benya, PE, FIES, FIALD. Mr. Benya personally took lighting measurements, photos of the field lighting from various vantage points in the surrounding community, and provided expert witness of the lighting impact. All were included in his report. Please access the lighting study at the following link:

[http://www.tfasbs.org/uploads/Hoover Lighting Report 11-8-13 with Bio.pdf](http://www.tfasbs.org/uploads/Hoover_Lighting_Report_11-8-13_with_Bio.pdf) The report concludes the following: "...this lighting installation has an undeniably significant, adverse and immitigable impact on the local environment and aesthetics that should have been identified and admitted to in the EIR and appendices, and should have prevented the MND from being granted."

*It should be noted that on page 4 of the previously approved Final Mitigated Negative Declaration where Noise was identified as a Potentially Significant Impact, the lead agency determined "that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared." This previous false determination by the lead agency to process only an MND is why it is so important that full Environmental Impact Reports are developed for projects like these so all potential effects can be studied properly. In this particular case there are 2 significant immitigable impacts to the surrounding environment that were not identified under an MND.*

**Page E-3, paragraph 2:**

You need to add Field Lighting to your list of known Significant Impacts and include in your list of alternatives.

**Page E-3, paragraph 3 (Project Alternatives):**

Why weren't viable Alternatives studied as part of this DEIR? Both Alternative 1 and 2 presented in the DEIR are throw-a-ways.

For all intents and purposes this project should not be approved with Noise and Lighting both known as significant immitigable impacts to the surrounding environment. Taxpayers' would, however, like to submit a modified version of Alternative 1 for your consideration to reduce the impact from both Noise and Lighting.

### **Modified version of Alternative 1-**

In the best interest of the students, athletes, parents, alumni, administration of Hoover High School, and as a compromise with the surrounding community it would be prudent to come to an agreement on a maximum number of 15 evenings/nights under a lighted field per year with strict enforceable field use policies and procedures in place taking into account the known significant immitigable impacts of Noise and Lighting. Very detailed mitigation measures would be included in the Mitigation Monitoring and Reporting Program (MMRP) to ensure the impact of noise and lighting is reduced to an acceptable level and accountability measures are in place to ensure that the significant impacts remain at an acceptable level. It would be up to the school administration to determine which activities occur under a lighted field – evening/night events, evening/night practices, and non-Hoover evening/night events all fall within the 15 per year. This modified version of Alternative 1 generously enables all home games in the football program. It also meets all of the Project Objectives; 1) Able to conduct evening events; 2) provides an opportunity for more people (parents, students, etc...) to attend the games; 3) and provides a safer facility for fans attending the game as well as be ADA compliant.

### **Page ES-5, MMRP Table ES-1:**

The following mitigation measures need to be included in the Summary of Significant Impacts and Mitigation Measures and included in the Mitigation Monitoring and Reporting Program (MMRP). These mitigation measures are expected to reduce but not eliminate the significant impacts of Noise and Lighting on the local environment:

#### Noise Mitigation –

- Maximum of 15 evenings/nights under a lighted field per year.
- Reduce ticket sales to accommodate one-third capacity stadium (supported by DEIR studies conducted).
- Reduced field use on Saturday and no field use on Sunday.
- Code of conduct for patrons developed, posted, advertised, and enforced.
- Restrictions from bringing noise makers, air-horns, drums, or other noise generating devices into the stadium and field area.
- PA system restricted to a set decibel level with community concurrence and only used for field events. PA system is not to be used for practices.
- No play action announcing over the PA system such as what you hear on broadcast radio.
- Music shall not be played over the PA system.
- No use of PA system prior to 8:00 AM.
- No outside groups would be allowed to use the PA system.
- No outside amplification speaker system shall be brought in and used at the field.
- No band practice on the field after 5:00 PM unless under a lighted field at which case that would be extended to 7:00 PM but would be counted against the 15 total evenings under a lighted field.
- Reduced size of band (Pep Band) for all lighted events with exception of Homecoming.
- A phone number and/or e-mail address will be published on the Hoover website to accommodate receipt of noise complaints.
- A district/community committee will be established and hold a year-end review of all activities held under the lights to ensure compliance with the MMRP.

- District to provide yearly reports to the BOE with metrics regarding the implementation of the MMRP.

#### Lighting Mitigation–

- Maximum number of 15 evenings/nights under a lighted field per year.
- Lighting dimmed by 9:00 PM and fully extinguished by 10:00 PM.
- Identify which field activities can be played under a less than fully lit field and ensure those field activities are played under the reduced light conditions.
- Identify which field activities can be played within only a portion of the field and ensure only the necessary lights are illuminated for those identified activities.
- Plant and maintain appropriate size trees at football field where it borders the residential community to assist with light spillage and glare.
- A district/community committee will be established and hold a year-end review of all activities held under the lights to ensure compliance with the MMRP.
- District to provide yearly reports to the BOE with metrics regarding the implementation of the MMRP.

All that is listed above should be included in the Mitigation Monitoring and Reporting Program (MMRP) and there shall be set consequences included in the MMRP if measures are not followed with consequences becoming more severe each successive occurrence until compliance is reached. The most severe consequence being a reduced number of evenings/nights under a lighted field or even the loss of lighted field privileges altogether.

#### **Please Note:**

*Even though a masonry wall was built behind the visitor bleachers, its main purpose was to screen the bleachers from the community. A secondary benefit was that it reduced the noise level of those residents living directly to the North of the wall. But for those that live to the East and West, the wall aids in the transmission of sound similar to that of a megaphone.*

*As mentioned in the EIR Scoping submission but not addressed anywhere in the DEIR is the effect the canyons play with sound transmission. One of the canyons is adjacent to the football field starting at Monroe Ave and extending north to a Multi-Habitat Planning Area and beyond. This allows noise to travel far distances. Why wasn't the issue with sound transmission in the canyon addressed in the DEIR?*

#### **Page1-1, Section 1.1 Project Objectives:**

The first objective can not be met in the manor that the district is pursuing. There are different settings at school sites. Some are distant from residential communities and others butt up against each other so the one-size-fits-all model does not fit all neighborhoods. If parity is so important, why didn't the District consider an option of reducing all campuses to the lowest common denominator or at least somewhere in between to reach this objective? It certainly would have been more cost effective. Additionally, at the time when the Hoover High School ADA Upgrades to Athletics Facilities project (as the project was originally defined) was presented to the public, only half of SDUSD high school football fields had permanent stadium lighting.

Refer to the presentation material at the following link:

[http://www.tfasbs.org/uploads/Hoover\\_Projects\\_Originally\\_Presented.pdf](http://www.tfasbs.org/uploads/Hoover_Projects_Originally_Presented.pdf)

**Page 1-2, Section 1.3.1 Project's Component Parts**

It is mentioned in the 5<sup>th</sup> bullet point that field lighting is being installed to allow sporting events after dusk for football, soccer, and track. Why did Alternative 1 on page ES-4 only mention football events? Explain why the DEIR is inconsistent.

**Page 1-7, Note at top of page:**

Please answer why we still see the access gates open on Highland when the DEIR states that the only spectator entrance to the campus is located on El Cajon Boulevard?

**Page 1-8, Section 1.4.1 Stadium Lighting:**

It is stated that the stadium lighting is designed to be fully shielded onto the stadium field. The words "fully shielded" are misleading. Not all light is directed onto the field. If that were the case, no-one would be able to see a kicked or punted football. By design, field lighting systems intentionally spill a certain amount of light upward. You should not be using the terms 'design' or 'proposed' anymore, the lighting poles are installed. Why does the DEIR keep referring to what is designed to be installed and not what was actually installed. Is the Musco lighting system Light Structure Green the system that is installed? If so, call it that in the DEIR. After all, one of the purposes of the DEIR is to inform.

**Page 1-8, Section 1.4.2 Public Announcement System:**

By the description the PA sounds like a very capable system. Please explain why restrictions in the usage of the PA system were not included in the MMRP? The MMRP entry is the same for the Final MND and the Draft EIR. Per the observed Post Event reports submitted after each football game in 2012, the PA system was observed to be set louder at each successive game. Refer to the Post Event Reports via this link:

[http://www.tfasbs.org/uploads/Football\\_Season\\_2012\\_Post\\_Event\\_Reports.pdf](http://www.tfasbs.org/uploads/Football_Season_2012_Post_Event_Reports.pdf)

**Page 1-10, Section 1.6.2 Environmental Characteristics:**

Even though the 'project site' does not contain any sensitive biological resources, the effects of the project has a broad reach in the form of noise and excessive lighting to those nearby sensitive biological receptors. Please explain why there wasn't any consideration given for the project impact to these resources especially taking into consideration noise/lighting transmission through canyons.

**Page 1-10, Section 1.7.1 Aesthetics:**

With lighting poles at 87 and 99 feet tall many scenic views have been affected. This is vividly apparent in the attached photos when the field lighting was first installed and includes views from across canyons and Multi-Habitat Planning Areas showing the lighting poles stretching up above the trees interrupting the canyon views. Refer to the photos at the following link:

[http://www.tfasbs.org/uploads/Pictures\\_of\\_Hoover\\_Stadium\\_Lights\\_Installed\\_on\\_10-21-2011.pdf](http://www.tfasbs.org/uploads/Pictures_of_Hoover_Stadium_Lights_Installed_on_10-21-2011.pdf) Please explain why these huge lighting poles installed in a historical community of Talmadge were considered not having an Aesthetic impact to vistas.

**Page 1-11, Section 1.7.3 Biological Resources:**

Again, even though the MHPA is not directly adjacent to the project site, the impacts of the project in operation has a far reaching impact to sensitive biological receptors. Please explain why there wasn't any consideration given for the project impact to these resources?

**Page 2-10, paragraph 2:**

Even with the installation of the four-channel PA system, the MMRP is worthless without limitations or restrictions imposed on its use. Why weren't restrictions on the use of the PA system included in the MMRP including consequences for not adhering to the operational restrictions?

**Page 2-15, Section 2.1.6 Mitigation Measures**

There is only the mention of the new four-channel PA system (hardware) with lots of capability but no mention of enforceable operational limitations implemented. Why is there no mention of obvious operational techniques to reduce excessive noise such as when the PA system can be used? What type of audio can be sent over the PA system? What is the maximum volume setting? What restrictions have been put in place for external amplification systems that don't need the PA system? Noise mitigation measures mentioned in the MMRP are worthless without operational limitations and restrictions. Please explain why these were not included in the DEIR even though it was mentioned in a response to the original Draft MND and again in the EIR Scoping.

**Page 3-3, Impact Thresholds:**

The 4<sup>th</sup> bullet item states that there is an Impact Threshold if the project "creates a new source of substantial light or glare, which would adversely affect day or nighttime views in the area."

Please refer to the lighting study at the following link:

[http://www.tfasbs.org/uploads/Hoover\\_Lighting\\_Report\\_11-8-13\\_with\\_Bio.pdf](http://www.tfasbs.org/uploads/Hoover_Lighting_Report_11-8-13_with_Bio.pdf) which clearly shows this threshold has not only been met, but exceeded. The argument of meeting this threshold becomes even stronger when combined with the photos of the installed field lighting shown from various viewing points around the community found at the following link:

[http://www.tfasbs.org/uploads/Pictures\\_of\\_Hoover\\_Stadium\\_Lights\\_Installed\\_on\\_10-21-2011.pdf](http://www.tfasbs.org/uploads/Pictures_of_Hoover_Stadium_Lights_Installed_on_10-21-2011.pdf)

**Page 3-4, Mid-City Communities Plan:**

Due to the height of the light poles, these structures can be seen for miles and do have a degrading impact on the canyon views, especially at sunset with the lights illuminated. Several of the photos are taken from across canyons and one is taken across a MHPA. Refer to the following link:

[http://www.tfasbs.org/uploads/Pictures\\_of\\_Hoover\\_Stadium\\_Lights\\_Installed\\_on\\_10-21-2011.pdf](http://www.tfasbs.org/uploads/Pictures_of_Hoover_Stadium_Lights_Installed_on_10-21-2011.pdf)

**Page 3-5, Light/Glare:**

Yes, the installed lights are at different heights than what was in the original lighting study conducted by the District. As shown in the independent lighting study, there are many items that are different such as the actual lighting measurements taken from the As-Built lighting structures. Please refer to the independent lighting study at the following link:

[http://www.tfasbs.org/uploads/Hoover\\_Lighting\\_Report\\_11-8-13\\_with\\_Bio.pdf](http://www.tfasbs.org/uploads/Hoover_Lighting_Report_11-8-13_with_Bio.pdf) You will

clearly see further justification for a determination of Significant Immitigable Impact to the surrounding environment.

**Page 3-11, second paragraph:**

Crape Myrtle trees are only planted along Highland Ave. No Crape Myrtle trees are planted along Monroe Ave. Additionally, the 13 Queen Palms that were planted are located only behind the visitor bleachers. Not that the trees were going to provide much if any filtering of light from these light poles at 87 and 99 feet tall, but with no trees planted along several of the long sections of Monroe Ave border there is no possibility of filtered light. These 'as-built' conditions should have been included in the DEIR. Please explain why they were not?

**Page 3-13, first paragraph:**

Please explain how you determined that the maximum mature height of a 25 foot tall Crape Myrtle tree can possibly disrupt the line of site to the lighting elements of 99 and 87 foot tall lighting standards. The math doesn't add up. Perhaps if the trees were planted in the middle of the street this would be possible but that would not be feasible now would it. Please provide your calculations where you made these determinations. Additionally, even though a Crape Myrtle is a showy tree, it doesn't grow very fast. Why was there a change in the type of tree planted for the purpose of lighting mitigation?

**Page 3-14, second paragraph:**

The DEIR says that 5 African Sumac trees, not 4, were planted at the North-East corner of the project area and that the 'as-built' project detail show 13 Queen Palms as well. Yes, 13 Queen Palms were planted behind the visitor bleachers along Monroe Ave but other than the Queen Palms, only bushes were planted along the Monroe Ave border. Please provide a detail drawing of what plants were actually planted and where they were planted along the Monroe Ave border. Additionally, provide a timeline when trees of sufficient size will be planted along Monroe Ave to mitigate the direct line sight of the lights standards.

**Page 3-14, fourth paragraph:**

Your conclusion is incorrect. Based on the Independent Lighting Study conducted by James Benya, a world renowned expert in the field of lighting: "...this lighting installation has an undeniably significant, adverse and immitigable impact on the local environment and aesthetics that should have been identified and admitted to in the EIR and appendices, and should have prevented the MND from being granted." Please refer to the independent lighting study at the following link: [http://www.tfasbs.org/uploads/Hoover\\_Lighting\\_Report\\_11-8-13\\_with\\_Bio.pdf](http://www.tfasbs.org/uploads/Hoover_Lighting_Report_11-8-13_with_Bio.pdf)

**Page 3-14, Section 3.1.1.4 Cumulative Impact Analysis:**

Again, the DEIR continues to use the term "proposed project" when in fact, the project has been completed and is in its 'as-built' condition. There is most definitely a cumulative impact when Lighting and Noise are combined, both of which have been shown to have a significant immitigable impact to the surrounding environment.

**Page 3-14, Section 3.1.5**

A. Views-

Agree that there are no ‘designated’ scenic views but there are most certainly views of scenic resources that are affected by the field lighting. These are shown in a few slides within the collection of photos of the installed lighting from various vantage points within and around the community. Refer to the following link:

[http://www.tfasbs.org/uploads/Pictures\\_of\\_Hoover\\_Stadium\\_Lights\\_Installed\\_on\\_10-21-2011.pdf](http://www.tfasbs.org/uploads/Pictures_of_Hoover_Stadium_Lights_Installed_on_10-21-2011.pdf)

**Page 3-15, second paragraph:**

C. Light/Glare-

James Benya’s Independent Lighting Study concludes “...this lighting installation has an undeniably significant, adverse and immitigable impact on the local environment and aesthetics that should have been identified and admitted to in the EIR and appendices, and should have prevented the MND from being granted.”

**3.1.1.6, Mitigation Measures:**

Include Mitigation Measures for Lighting

- Maximum number of 15 evenings/nights under a lighted field per year.
- Lighting dimmed by 9:00 PM and fully extinguished by 10:00 PM.
- Identify which field activities can be played under a less than fully lit field and ensure those field activities are played under the reduced light conditions.
- Identify which field activities can be played within only a portion of the field and ensure only the necessary lights are illuminated for those identified activities.
- Plant and maintain appropriate size trees at football field where it borders the residential community to assist with light spillage and glare.
- A district/community committee will be established and hold a year-end review of all activities held under the lights to ensure compliance with the MMRP.
- District to provide yearly reports to the BOE with metrics regarding the implementation of the MMRP.

**3.1.1.7, Conclusion:**

The conclusion needs to reflect that there are two Significant and Immitigable Impacts to the surrounding environment – Noise and Lighting and that a Modified version of Alternative 1, presented earlier in this comment letter, is an acceptable Alternative for the BOE to accept that provides an acceptable level of significant impact and an acceptable level of compromise from all parties.

**Pages 3-54 thru 3-56**

The DEIR did a good job detailing the specifics regarding Traffic and Parking including the mitigation associated with parking by first having patrons park on the school property and by having the entrance to field accessible only from El Cajon Blvd. We do, however have some questions on how the number of off-site parking spots (413) were identified. How were parking spots counted? Was this by driving around or by using Google Earth and identifying spaces along the roadside? We ask, because the surrounding streets are narrow and many have red curb stripping that prohibits vehicle parking. We suspect to reach this high of a number of available parking spaces there had to be some incorrectly counted parking spots that were red stripped. What assurances are there that red stripped curb areas were not included in the totals?

Additionally, allot of the apartment buildings have front parking stalls so no curb parking is available. The number that the DEIR states is a bit unbelievable.

**Page 3-56, Conformance with Mid-City Communities Plan:**

You state at the top, within this section, that the project is in conformance with the Mid-City Communities Plan's Transportation Element goals by providing parking that is adequate for its intended use, but that does not produce negative impacts on community character by providing an oversupply of parking. That being said, the Hoover stadium can seat almost 4,000 people with the calculation rounding up to 2 persons per vehicle from your own parking study. That makes 2,000 cars that will need parking. Factor in the 50% estimation for those taking alternative mode of transportation (i.e., walking, biking, etc) and you are still left with at least 1,000 vehicles to park. By your statement above, is it safe to say that the intended use of the field is a 1/3 capacity stadium event? After all, one of the main goals of the District was to increase attendance at these games so this needs to be clarified. Additionally, when you rent out the stadium (including Civic Center Act use) will there be restrictions on attendance to a 1/3 capacity? If not, then why don't the calculations reflect a full capacity stadium (parking, traffic, safety, etc)?

**General and Specific Statements in regards to Field Usage for Hoover and non-Hoover Activities (including Civic Center Act activities):**

Rental of Field:

- Visibly absent from the DEIR is any mention of Field Rental use (including Civic Center Act).
- Need to include defined and publicized field use policies with accountability.
- Limited daytime Saturday use of field and no Sunday use.
- District needs to realize and accept that they are ultimately responsible for 3<sup>rd</sup> party events occurring on their property and the impact those events may have on the surrounding community whether the events occur during the day or the night and do everything within their means to mitigate the negative impacts of these activities.

Communications:

- District shall make reasonable efforts to keep the community informed, by providing notice, at least 5 business days prior, of upcoming Spectator Events on the Herbert Hoover High School website and by sending email notices of them to persons who request such notice and provide Herbert Hoover High School with an email address.
- Herbert Hoover High School will regularly instruct and communicate with its students, their families and staff to educate them concerning the implementation of this plan, including but not limited to a program for parking, access and pre- and post-event loitering.
- A Visiting Team Information sheet will be supplied in advance to inform visitors of this Security Plan, including traffic and parking controls, which includes a map to designated onsite event parking lots and areas.
- Code of conduct for patrons developed, posted, advertised, and enforced.
- Under this Security Plan, Herbert Hoover High School will deploy traffic flaggers and utilize professionally prepared and strategically placed signage to inform attendees to designated

and available parking areas and that the only entrance to the Field is from the front of the campus.

#### Pedestrians:

- Herbert Hoover Students, Fans, and attendees will be encouraged to walk or bike to Spectator Event.

#### Traffic and Parking Mitigation:

- There will be no public entrance to or non-emergency exit from the Herbert Hoover High School campus and the Field onto Highland Avenue or Monroe Avenue. All public ingress and egress will be via El Cajon Boulevard.
- Direct all visitors to the front entrance along El Cajon Blvd.
- Include tasteful signage stating 'no event parking' at various locations around the field.
- The gates on Highland Avenue by the Armory and by the 200 Building will be closed 1.5 hours before the start of any Spectator Event to discourage fans from parking toward the north of the campus. Fans who do decide to park on those streets must travel to the front of the school to gain access to the Field.
- Fans will be encouraged to park in the Herbert Hoover High School Parking Lots:
  - o Front Lot
  - o 200 Building Lot
  - o Chamoune Alley Lot
- Overflow parking will be directed to the outfield of the baseball field.
- For accommodating parked vehicles for larger events (day or night), utilize onsite parking lots first, then the baseball field, and only when those accommodations are full, direct folks to street parking.
- Staff working or attending night games will be encouraged to park on campus in the front quad and along the stadium alley to open up parking spaces for fans.
- For football games, or any other high attendance event (day or night), ensure there are a sufficient number traffic flaggers, security personnel,
- School buses are not to be parked "on" a city street where the bus impedes traffic flow. This is a public safety response issue and must be addressed in the DEIR.

#### Post Game - Vacating Stadium at End of Game:

- Fans will be directed by security and staff to exit the Field and school by walking down the "Goodall Walk of Champions" towards the front of the school and out to El Cajon Blvd.
- Cars will be directed by security and staff to exit toward El Cajon Blvd.
- Staff and administration will facilitate timely exit of all attendees.
- Staff supervision will assist in emptying campus and securing campus gates.

#### Supervision Plan - Noise Controls

- In compliance with CIF rules, noisemakers (Miniature megaphones, cowbells, air horns, blocks, whistles, cannons, drums, thundersticks, vuvuzelas, etc.) are prohibited. (Musical instruments in a reduced size Pep Band are excepted but reasonable limits shall be placed on the use of drum corp.) Megaphones will only be used by uniformed cheerleaders to direct and control rooting sections and shall not be used towards athletes or the opposing team. Amplification by cheerleaders is only permitted if the speakers are directed toward their own rooters.

- The public announcement system shall face south, towards campus and El Cajon Blvd to minimize sound to neighborhood. The volume of the PA System will be strictly enforced to not have a significant impact on the surrounding neighborhood.
- The public announcement system will be turned off at the completion of an Evening Spectator Event, which will be approximately 9:00 p.m., except for emergency use. For a daytime Spectator Event or Third Party Spectator Event, the public announcement system will be turned off at the conclusion of the main activity for the event.
- Except for the exceptions stated above, the use of any amplification system, other than the Field's installed school's four channel PA system, in and around the Field associated with all events area is strictly prohibited.

#### Litter:

- Place trash receptacles at all entrances and empty often. Work with the city to include city trash cans on city right of way on event days. If receptacles are provided, patrons will be more apt to use them instead of disposing of their trash in the streets, curbs, sidewalks, and residential property.
- Perform perimeter litter pickup after events to show pride in school's appearance and reduce impact to the surrounding community.

#### Post-Event/Clean-Up

- Field Lighting will be dimmed following the completion of evening/night events which is expected to occur no later than 9:00 PM.
- Fans will be directed to exit towards El Cajon Blvd by security and staff
- Field will be cleaned by assigned members of the Football Coaching Staff
- Field Lighting will be turned off by 10 p.m.
- On the Day or Night of the Event: Custodial will lock and/or turn off
  - o Concession Stand
  - o Restrooms
  - o Gates to Stadium
- On the Morning Following the Event
  - o Custodial and Athletic Director will secure student volunteers/clubs to:
    - Clean Bleachers
    - Clean Perimeter of the stadium along Highland Ave, Monroe Ave, Norwood St, and 46<sup>th</sup> St
    - Empty Trash
    - Clean Concession Stands
    - Clean Restrooms
    - Clean Parking Lot
  - o All cleanup to be completed by 10 a.m. the morning following any evening event. For daytime spectator events, cleanup to be completed by 7 p.m. the day of the event.

#### Crime Prevention:

- Security needs to be addressed on and off the school property. The school is responsible for the safety of every event, on and off the field that is a direct relationship to the hosted event, and needs to have existing procedures in place to ensure the safe execution of day

and night events. An excerpt from the school site safety plan needs to be included in the EIR addressing this issue.

- With the introduction of night use under lights, the stage has been set for increased crime under the cover of darkness in the surrounding neighborhood. It should be noted that the UT reported that the SDUSD banned all High School night football games back on Nov 14th, 1973 due to increased violence at night games. Refer to the following link: [http://www.tfasbs.org/uploads/School\\_Board\\_Acts\\_to\\_End\\_Night\\_Games\\_-\\_11-14-1973.pdf](http://www.tfasbs.org/uploads/School_Board_Acts_to_End_Night_Games_-_11-14-1973.pdf) This is about the same time Hoover's old field and stadium were torn down along with over 35 residential homes to make way for a new field and stadium (without lights) installed closer to the residential neighborhood. For 40 years it has stood without permanent lights. Refer to the following link: [http://www.tfasbs.org/uploads/Aerial\\_view\\_of\\_Hoover\\_from\\_1973\\_showing\\_prior\\_configuration\\_of\\_FB\\_Field.pdf](http://www.tfasbs.org/uploads/Aerial_view_of_Hoover_from_1973_showing_prior_configuration_of_FB_Field.pdf)

#### **Page 4-1, Alternatives:**

For all intents and purposes this project should not be approved with Noise and Lighting both known as significant immitigable impacts to the surrounding environment. Taxpayers' would, however, like to submit a modified version of Alternative 1 for your consideration to reduce the impact from both Noise and Lighting - please include in the Final EIR.

Modified version of Alternative 1-

In the best interest of the students, athletes, parents, alumni, administration of Hoover High School, and as a compromise with the surrounding community it would be prudent to come to an agreement on a maximum number of 15 evenings/nights under a lighted field per year with strict enforceable field use policies and procedures in place taking into account the known significant immitigable impacts of Noise and Lighting. Very detailed mitigation measures would be included in the Mitigation Monitoring and Reporting Program (MMRP) to ensure the impact of noise and lighting is reduced to an acceptable level and accountability measures are in place to ensure that the significant impacts remain at an acceptable level. It would be up to the school administration to determine which activities occur under a lighted field – evening/night events, evening/night practices, and non-Hoover evening/night events all fall within the 15 per year. This modified version of Alternative 1 generously enables all home games in the football program. It also meets all of the Project Objectives; 1) Able to conduct evening events; 2) provides an opportunity for more people (parents, students, etc...) to attend the games; 3) and provides a safer facility for fans attending the game as well as be ADA compliant.

#### **Stadium Event Plan:**

The stadium event plan is a separate document from the DEIR and is available at the following link:

[http://www.sandi.net/cms/lib/CA01001235/Centricity/domain/82/environmental\\_studies/hooverhs/draft%20eir%2010.2013/App%20D3%20-%20Stadium%20Event%20Plan.pdf](http://www.sandi.net/cms/lib/CA01001235/Centricity/domain/82/environmental_studies/hooverhs/draft%20eir%2010.2013/App%20D3%20-%20Stadium%20Event%20Plan.pdf)

The following statement is written in the first paragraph of the Stadium Event Plan:

*Components of the security plan are addressed in this outline: Supervision, crowd control, traffic, parking, noise, and litter.*

With the exception of this one mention, noise is not addressed anywhere else in the stadium event plan. Include all items from the MMRP in the Stadium Event Plan and discuss, if applicable, how the Mitigation Measures will be carried out in the Stadium Event Plan and Security Plan.

In review, the following Noise mitigation and Lighting mitigation measures should be added to the MMRP and addressed in the Stadium Event Plan and Security Plan:

#### Noise Mitigation –

- Maximum of 15 evenings/nights under a lighted field per year.
- Reduce ticket sales to accommodate one-third capacity stadium (supported by DEIR studies conducted).
- Reduced field use on Saturday and no field use on Sunday.
- Code of conduct for patrons developed, posted, advertised, and enforced.
- Restrictions from bringing noise makers, air-horns, drums, or other noise generating devices into the stadium and field area.
- PA system restricted to a set decibel level with community concurrence and only used for field events. PA system is not to be used for practices.
- No play action announcing over the PA system such as what you hear on broadcast radio.
- Music shall not be played over the PA system.
- No use of PA system prior to 8:00 AM.
- No outside groups would be allowed to use the PA system.
- No outside amplification speaker system shall be brought in and used at the field.
- No band practice on the field after 5:00 PM unless under a lighted field at which case that would be extended to 7:00 PM but would be counted against the 15 total evenings under a lighted field.
- Reduced size of band (Pep Band) for all lighted events with exception of Homecoming.
- A phone number and/or e-mail address will be published on the Hoover website to accommodate receipt of noise complaints.
- A district/community committee will be established and hold a year-end review of all activities held under the lights to ensure compliance with the MMRP.
- District to provide yearly reports to the BOE with metrics regarding the implementation of the MMRP.

#### Lighting Mitigation–

- Maximum number of 15 evenings/nights under a lighted field per year.
- Lighting dimmed by 9:00 PM and fully extinguished by 10:00 PM.
- Identify which field activities can be played under a less than fully lit field and ensure those field activities are played under the reduced light conditions.
- Identify which field activities can be played within only a portion of the field and ensure only the necessary lights are illuminated for those identified activities.
- Plant and maintain appropriate size trees at football field where it borders the residential community to assist with light spillage and glare.

- A district/community committee will be established and hold a year-end review of all activities held under the lights to ensure compliance with the MMRP.
- District to provide yearly reports to the BOE with metrics regarding the implementation of the MMRP.

Taxpayers' look forward to all items included in this letter to be addressed in the Final EIR.

Sincerely,

Ron Anderson, President  
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