



P.O. Box 16391, San Diego CA 92176

May 29, 2013

Kathie Washington  
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304 Ivy Street  
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Re: Comments by the Kensington-Talmadge Planning Group on the EIR related to the Hoover High School Athletic Facilities Project

Dear Ms Washington:

Thank you for distributing the Notice of Preparation and arranging for the Scoping Meeting for the Herbert Hoover High School Athletic Facilities Upgrade. This correspondence serves as the Kensington Talmadge Planning Group's official response as the duly elected and officially recognized representatives for the community directly affected by the proposed and already constructed improvements detailed in the Notice of Preparation. This correspondence will detail our concerns with the environmental impacts associated with the proposed improvements as they are related, but not limited to, the installation of improved lighting and their associated photometric impacts, the installation of the proposed public address system and other foreseeable acoustical impacts associated with the improvements, the possibility of an increase in unlawful behavior, and parking and traffic impacts.

The Kensington Talmadge Planning Group requests a new photometric or other study necessary to evaluate the effects of the field lighting. The Mitigated Negative Declaration (MND) made assumptions of the dampening affects of the trees included in the landscaping plan. We believe these trees are not adequate buffers for the effects of the field lighting and have no chance of doing so based on the heights of the lights and the growth patterns associated with the planted trees. In addition, the MND does not take into consideration the types of events that warrant lighting of the athletic facility. The EIR should determine these events and should take into consideration the April 17, 2009 school superintendent's agreement to hold no more than 15 night time events at the athletic facility.

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The acoustical study prepared for the Herbert Hoover High School Athletic Facilities Upgrade did not sufficiently account for a majority of the noises that are assumed to be associated with such an improvement. The study did account for the public address systems impact, but not for any prescribed amount of usage or volume level. The affects of a school band need to be addressed as well as noise making devices handled and operated by attendees. Due to the surrounding terrain, which includes many canyons and hillsides, the acoustical study must not be limited to the boundary of the stadium and should include the surrounding affected area.

There is a concern from the surrounding residents and business owners that crime will increase due to the anticipated behavior associated with some of the events that have been suggested as uses for the improved facility. The EIR should include a security plan and also contain a school site safety plan. A plan to address the necessary onsite and offsite clean up should be included as well

In all project documentation provided to the public there was only mention of parking being added and no mention of parking removed to install the two-story classroom building and the single story industrial arts building. Parking should be listed in the EIR as a Net Increase or Net Decrease. With a large capacity stadium, per City code, the district needs to provide adequate parking for its patrons within its own property. Additionally, the parking study needs to include existing parking conditions on residential and commercial streets that surround the school and should extend out at least 2 blocks in all directions. The study should include the hours of a typical Friday night event – 6:00 pm to 10:00 pm and a typical Saturday event. Historically events have taken place from 7:00 am till dusk. Once the lights are installed events may take place as late as 10:00 pm on the weekends. The study needs to account for this possibility.

The parking study needs to take into consideration the number of vehicles associated with a sold out event. Obviously, not all attendees or field use participants will occupy one of the approximately 4,000 bleacher seats. The actual number of what constitutes a sold out event needs to be disclosed and included in the parking study. It has already been put on record by several school board members that they wish to maximize the use of the fields for day and night use so the number of attendees and participants and their associated parking requirements for a sold out event needs to be determined and clarified in your study case. The study should not be based on past attendance numbers only.

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The parking study needs to account for several activities taking place on the school grounds simultaneously. It is possible for facilities of different use types to be used at the same time with both activities competing for the same parking.

The parking study needs to show where the onsite parking is located and then address the environmental and safety impact of attendees and participants searching for a parking spot on the available campus parking infrastructure rather than being directed to a specific lot. This excess driving has an environmental and safety impact that should be taken into consideration. An average patron will usually take the easier route and choose street parking rather than attempt to search for unidentified or difficult to locate off-street campus parking.

The traffic study needs to include 'all affected' residential streets surrounding the school, not just the main commercial and circulation element streets that feed the area. All surrounding streets need to be listed by name in the EIR. With the area confined by canyons and with many narrow and meandering residential streets, this becomes even more important when emergency ingress and egress must be maintained.

Both existing and proposed written school site safety plans need to be analyzed to ensure they sufficiently address the safety of all attendees and participants (as pedestrians, or drivers and their passengers) and residents who will be affected with this increased traffic. Taking the school's word that existing safety procedures will be used is not sufficient and is unacceptable.

Staging of school buses before, during, and after a large school sponsored event such as a football game needs to be addressed. The school cannot use residential streets to park team buses if traffic lanes are blocked because of insufficient street width.

Over the last decade traffic impacts from the growth of the area surrounding Hebert Hoover High have become a major concern. The streets directly adjacent to the school and close by have already been impacted beyond their design capacities. A traffic study must include the impacts associated with the possible proposed uses of the athletic facility.

Both the parking study and the traffic study need to be completed while evaluating the impact of a sold out event. The study should not be based on past attendance numbers only since one of the main reasons the district is installing new fields and larger stadiums is to increase attendance. Additionally, maximizing the use of the field means

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more uses of the field for both school and non-school related events. The EIR needs to disclose the district's intention of using the field for non-school related events or functions. The EIR should state what has already been stated by School Board members, that the district plans to maximize the field use. If the district wishes to honor the school superintendent's letter dated April 17, 2009 stating that there will be a maximum of 15 nighttime events held in the football stadium per year, and the facility will not be rented out for non-school uses such as adult soccer leagues then that language needs to be included in the EIR. Knowing how many events will take place in a given year and what the maximum attendance could be is the only way to truly evaluate the impact.

The Kensington and Talmadge communities appreciate this opportunity to present our concerns and hope that they will be addressed in the next draft of the Environmental Impact Report.

Sincerely,



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cc: Honorable Marti Emerald, Councilmember, 9<sup>th</sup> District