



P.O. Box 16391, San Diego CA 92176

December 2, 2013

Kathie Washington
Senior Project Manager
BRG Consulting, Inc.
304 Ivy Street
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Re: Comments to the Draft Environmental Impact Report (DEIR) for Hoover High School Athletic Facilities Upgrades Project

Ms. Washington:

The Kensington – Talmadge Planning Group, the body officially recognized by the City of San Diego to represent the views of the Kensington and Talmadge communities on land use, CEQA, and other matters would like to offer the following input on the Draft Environmental Impact Report. As presented, the project cannot reduce all noise and light impacts below a level of significance. However, an obvious and compelling alternative to the project has not been reviewed as part of the EIR drafting process. The Kensington – Talmadge Planning Group believes impacts can be mitigated by capping the number of events which violate CEQA thresholds. We believe it is significant whether or not the number of noise and light violations is one per year, 15 per year, or 365 per year.

We have reviewed the document that will be submitted by Taxpayers for Accountable School Bond Spending and in most respects agree with their input regarding possible mitigation measures which could be applied to this project but have not been offered in the DEIR. Therefore, the Kensington – Talmadge Planning Group supports the proposal which will be offered by Taxpayers for Accountable School Bond Spending (TFASBS) with two modifications. Our proposal follows, with the deviations from the TFASBS proposal bolded for your convenience.

Noise Mitigation –

- Maximum of 15 evenings under a lighted field per year.
- Reduced field use on Saturday and no field use on Sunday.
- Code of conduct for patrons developed, posted, advertised, and enforced.
- Restrictions on **attendees** 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 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 for all lighted events with an exception **for Hoover High School home football games.**
- 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 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 measures listed above should be included in the Mitigation Monitoring and Reporting Program (MMRP) and there should be set consequences included in the MMRP. If measures are not followed the consequences should become more severe with each successive occurrence until compliance is reached. The most severe consequence should be a reduced number of evenings/nights under a lighted field or even the loss of lighted field privileges altogether.

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/hoooverhs/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.

Sincerely,



David K. Moty
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