



APRIL 13, 2011

Piner High School Field Lighting Project

Final Environmental Impact Report

State Clearinghouse Number 2010032045

Santa Rosa City Schools
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Santa Rosa, CA 95401

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DESIGN, COMMUNITY & ENVIRONMENT

In Association with: Rosen, Goldberg, Der & Lewitz, Inc. | Crane Transportation Group | JRA Electrical Engineering



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TABLE OF CONTENTS

1	INTRODUCTION	1-1
2	REPORT SUMMARY	2-1
3	REVISIONS TO THE REVISED DRAFT EIR.....	3-1
4	LIST OF COMMENTORS	4-1
5	RESPONSE TO COMMENTS	5-1
6	MITIGATION MONITORING REPORT PROGRAM.....	6-1

SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
TABLE OF CONTENTS

Tables

Table 2-1 Summary of Significant Environmental Impacts and Mitigation Measures.....	2-8
Table 4-1 Inventory of Comment Letters Received on the Draft EIR	4-2

I INTRODUCTION

A. *Purpose of the Final Environmental Impact Report*

In accordance with Sections 15088, 15089, and 15132 of the California Environmental Quality Act Guidelines (State CEQA Guidelines), the Santa Rosa City Schools District (District) has prepared this Final Environmental Impact Report (Final EIR) for the proposed Piner High School Field Lighting Project, herein referred to as “project” or “proposed project.” The Draft EIR identified the likely environmental consequences associated with the project, and identified mitigation measures that help to reduce potentially significant impacts. The Final EIR responds to comments on the Draft EIR and makes revisions to the Draft EIR as necessary in response to these comments.

The Final EIR allows the public and Lead Agency to review revisions to the Draft EIR, comments, and responses to comments before approval of a project. This document, together with the Draft EIR, will constitute the Final EIR if the District certifies it as complete and adequate under CEQA. The changes and additions to the Draft EIR in response to comments do not constitute *significant new information* within the meaning of Public Resources Code section 21092.1, and therefore recirculation of the Draft EIR for public review and comment is not required.

After completing the Final EIR and before approving a project, the Lead Agency must make the following three certifications (State CEQA Guidelines Section 15090):

- ◆ The Final EIR has been completed in compliance with CEQA;
- ◆ The Final EIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project; and
- ◆ The Final EIR reflects the Lead Agency’s independent judgment and analysis.

In addition, if an EIR that has been certified for a project identifies one or more significant environmental impacts, the Lead Agency must adopt find-

ings of fact (State CEQA Guidelines Section 15091[a]). For each significant impact, the Lead Agency must make one of the following findings:

- ◆ Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the EIR.
- ◆ Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- ◆ Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Each finding must be accompanied by a brief explanation of the rationale for the finding. In addition, the Lead Agency must adopt, in conjunction with the findings, a program for reporting or monitoring the changes that it has either required in the project or made a condition of approval to avoid or substantially lessen impacts (State CEQA Guidelines Section 15091[d]). These measures must be fully enforceable through permit conditions, agreements, or other measures. This program is referred to as the Mitigation Monitoring Report Program (MMRP).

In addition, when a Lead Agency approves a project that would result in significant and unavoidable impacts that are disclosed in the EIR, the agency must state in writing its reasons for supporting the approved action (State CEQA Guidelines Section 15093[b]). This statement of overriding considerations must be supported by substantial information in the record, including the EIR.

The proposed project would result in significant and unavoidable impacts related to aesthetics (light and glare) and noise (operational).

B. Environmental Review Process

CEQA does not require formal hearings at any stage of the environmental review process (State CEQA Guidelines Section 15202(a)). However, it does encourage “wide public involvement, formal and informal... in order to receive and evaluate public reactions to environmental issues...” (State CEQA Guidelines Section 15201).

In compliance with Section 21080.4 of the California Public Resources Code, a Notice of Preparation (NOP) was prepared by the District and distributed to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on March 12, 2010 for a 30-day review period ending April 12, 2010. The NOP process solicited comments from identified responsible and trustee agencies, as well as interested parties regarding the scope of the EIR. The NOP was included in Appendix A, Notice of Preparation, of the Draft EIR. The comment letters submitted in response to the NOP were included in Appendix B, Comments on the NOP, of the Draft EIR.

A Draft EIR was prepared for the Piner High School Field Lighting Project. Pursuant to State CEQA Guidelines Section 15085, a Notice of Completion of the Draft EIR was filed with OPR State Clearinghouse on January 24, 2011 for a 45-day review period ending on March 9, 2011. Pursuant to State CEQA Guidelines Section 15087, the District provided at the same time a Notice of Availability (NOA) and the Draft EIR to various public agencies, citizen groups, and interested individuals for a 45-day public review period from January 24, 2011 through March 9, 2011. The Draft EIR was also circulated to state agencies for review through the State Clearinghouse of the Governor’s Office of Planning and Research. The NOA was posted with the Sonoma County Clerk and in the Press Democrat newspaper. Copies of the Draft EIR were available for review at the Santa Rosa City Schools (Maintenance Department), Piner High School, Northwest Branch Library, Santa Rosa Central Library, and on the District’s website at www.srscs.k12.ca.us (under public notices).

C. Document Organization

This FEIR, together with the Draft EIR, makes up the EIR as defined in the State CEQA Guidelines Section 15132 and has been organized into the following chapters:

- ◆ **Chapter 1 (Introduction):** This section discusses the use and organization of this Final EIR.
- ◆ **Chapter 2 (Report Summary):** This section is a summary of the findings of the Draft and the Final EIR. It has been reprinted from the Draft EIR with necessary changes made in this Final EIR shown in double underline and ~~striketrough~~.
- ◆ **Chapter 3 (Revisions to the Draft EIR):** Corrections to the text and graphics of the Draft EIR are contained in this section. Double underline text represents language that has been added to the Draft EIR; text with ~~striketrough~~ has been deleted from the Draft EIR.
- ◆ **Chapter 4 (List of Commentors):** Names of agencies and individuals who commented on the Draft EIR are included in this section.
- ◆ **Chapter 5 (Response to Comments):** This chapter contains reproductions of the letters received from agencies and the public on the Draft EIR. The responses are keyed to the comments which precede them.
- ◆ **Chapter 6 (Mitigation Monitoring Report Program):** This chapter identifies the required and recommended mitigation measures as well as the conditions set forth for project approval categorized by impact area.

2 REPORT SUMMARY

A. Overview

This section provides a summary of the findings of the Draft EIR and Final EIR. It has been reprinted from the Revised Draft EIR with necessary changes made in this Final EIR shown in double underline and ~~striketrough~~.

This summary presents an overview of the analysis contained in Chapters 4.1 through 4.5, Environmental Impact Analysis, of the Draft EIR. CEQA requires that this section summarize the following: 1) areas of controversy, 2) significant impacts, 3) unavoidable significant impacts, 4) implementation of mitigation measures, and 5) alternatives to the project.

B. Project Under Review

1. Location

The project site is located at 1700 Fulton Road, which is north of Guerneville Road, south of Piner Road, and immediately east of Santa Rosa's Youth Community Park. The project site is approximately 4.6 acres in size while the entire campus consists of one parcel (Assessor Parcel Number [APN] 152-050-003) for an approximate total of 40 acres.¹ The project site is located within the northwest portion of the parcel. The campus is currently designated Public/Institutional (PI) and zoned Planned Development (PD), in the City's General Plan and Zoning Ordinance, respectively.

2. Summary of the Proposed Project

The proposed project would involve the enhancement of the Jim Underhill Stadium on the Piner High School (PHS) campus in Santa Rosa, California through the installation and use of stadium lighting, pedestrian pathway lights, an additional visitor bleacher seating, and a new amplified public address system (PA system). PHS is currently the only school in the Santa Rosa

¹ City of Santa Rosa GIS Map Site, retrieved at <http://pmaps.ci.santa-rosa.ca.us/geocortex/essentials/web/viewer.aspx?site=Parcel%20Information> on February 24, 2010.

City School District without nighttime lighting in its outdoor sports facility. The project would allow Piner High School to hold nine additional events (481 existing compared to 490 proposed) in the stadium over the course of the school year and to accommodate an additional 200 spectators. Overall, there would be 35 nighttime events where stadium lighting would be used and nine additional events involving the use of the improved PA system (66 existing compared to 75 proposed).

The lighting system would consist of four, 70- to 80-foot standards (poles) with light fixtures on each pole to allow use of the upgraded athletic stadium for night events. A lighted stadium would be used for football and soccer competitions, track meets and related practices. The standards would be installed symmetrically around the stadium in a square formation. The lighting standard design would use the Light Structure Green (LSG) system, which only requires 50 to 1,500 watt metal halide high intensity discharge (HID) fixtures. The stadium would be lit between sundown and 10:00 p.m. and the lights would be manually switched off at 10:00 p.m., to avoid late night use.

Construction of the lighting would last 14 to 18 workdays and would be completed over a 4- to 5-week period with heavy equipment operation not to exceed eight days. The lights would be scheduled to be in place by the end of 2011.

C. Areas of Known Controversy & Issues to be Resolved

Section 15123 of the State CEQA Guidelines requires an EIR to identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public. The comments submitted to the District are contained in Appendix B of the Draft EIR. Concerns raised in letters submitted to the District and at the EIR scoping meeting included the following:

- ◆ Traffic and parking
- ◆ Noise
- ◆ Light and glare
- ◆ Trash

- ◆ Public protection
- ◆ Security, vandalism, and safety
- ◆ Number and hours of events
- ◆ Devaluation of homes and funding
- ◆ Privacy, landscaping, and fencing

All of these issues were addressed in the proposed project. To the extent that these issues have environmental impacts, they are also addressed in the Draft EIR.

D. Issues to be Resolved

Section 15123 of the State CEQA Guidelines also requires an EIR to identify issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects. Upon completion of this Final EIR, no such outstanding issues exist.

E. Significant Impacts

Under CEQA, a significant impact on the environment is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance.

Implementation of the proposed project has the potential to generate environmental impacts in a number of areas, including both project level and cumulative impacts. These topic areas are listed below.

- ◆ Aesthetics
- ◆ Noise
- ◆ Public Services (police)
- ◆ Traffic and Circulation

F. Mitigation Measures

Impacts associated with both public services (police), and traffic and circulation were found to be less than significant without mitigation. Specific mitigation measures were identified in the Draft EIR that would reduce the impacts of aesthetics (light and glare) and noise (operational), but not to a less-than-significant level. Each of the significant impacts are discussed in the following section and summarized in Table 2-1, Summary of Significant Environmental Impacts and Mitigation Measures. The mitigation measures in the Draft EIR and the Final EIR will form the basis of a Mitigation Monitoring Reporting Program (MMRP) presented in Chapter 6 of this Final EIR. The MMRP will to be implemented in accordance with California state law.

G. Unavoidable Significant Impacts

The proposed project would result in significant and unavoidable impacts related to the following:

- ◆ **Aesthetics.** The project would result in significant unavoidable light and glare impacts. The proposed project would introduce new sources of nighttime light and glare into the project area that would be noticeable to viewers in the surrounding area, particularly by residents in the homes along Quail Hollow Drive to the north, residential uses along Floral Way, Hickock Court, Marsh Court and Cody Court to the east, and to a lesser extent residential uses to the east along Peterson Lane and adjacent roadways in the vicinity of the site. Illumination of the field would also change the nighttime landscape and ultimately adversely affect nighttime views in the area for up to a five hour period. Light and glare impacts associated with the proposed field lights would be significant. These light and glare impacts cannot be reduced even with the implementation of the mitigation.
- ◆ **Noise.** The project would result in significant unavoidable impacts operational (crowd and public address system) noise. Projected maximum noise levels (L_{max}) levels are in excess of 65 dBA, would result in a poten-

tial for sleep disruption during evening games. In order to reduce project noise increases to less than 5 dBA Community Noise Equivalent Level (CNEL) at the nearby residential dwellings, an 8- to 10-foot-tall noise barrier wall would need to be constructed along the east and north property lines. However, with the installation of the barrier, the CNEL in the backyards of only the nearest homes would be reduced to within 5 dBA of existing levels, which is less than the threshold of significance. Homes that are more distant from the field would not experience a substantial reduction in field noise since they already benefit from the acoustical shielding provided by existing homes. These more distant homes would still be exposed to CNEL increase of more than 5 dBA over existing ambient noise levels, which is a significant impact. These noise impacts cannot be reduced even with implementation of mitigation.

Due to these conclusions in the EIR for the project, the District would be required to adopt a statement of overriding considerations if it approves the project. The statement of overriding considerations is not a substitute for the findings of fact described above.

These certifications, the findings of fact, and the statement of overriding considerations are included in a separate findings document prepared by the District. The Draft EIR (incorporated by reference), Final EIR, findings of fact, and statement of overriding considerations are submitted to the Lead Agency for consideration of the project.

H. Alternatives

The Draft EIR considered a range of alternatives to the proposed project to provide informed decision-making in accordance with Section 15126(d) of the State CEQA Guidelines. The following three alternatives to the proposed project are considered and described in detail in Chapter 6 of the Draft EIR:

- ◆ Alternative A: No Project – No Build
- ◆ Alternative B: (Alternate Schedule)
- ◆ Alternative C: (Reduced Light and Public Address System Use)-

Based on the analysis in Chapter 6, Alternatives to the proposed project, of the Draft EIR, Alternative A (No Project) would be the Environmentally Superior Alternative because it would not result in significant impacts to aesthetics, noise, public services (police), transportation, and traffic. However, pursuant to State CEQA Guidelines Section 15126.6(e), Alternative A cannot be adopted as the Environmentally Superior Alternative. As such, Alternative C (Reduced Light and Public Address System Use) would be the Environmentally Superior Alternative because it would reduce impacts from those of the proposed project with regards to aesthetics and noise.

Alternative C would reduce the number of events using the lighting and public address system (PA system). Under Alternative C, the project would reduce the number of proposed evening practices utilizing the lights from 25 to 12. Additionally, the proposed 75 annual events utilizing the full PA system would be reduced by turning off the PA system on the visitor's side during 46 proposed annual events (36 soccer games, six track meets (five existing plus one proposed), and four student assemblies). Under this alternative, the number of events proposed to use the lighting system when compared to the proposed project would be reduced by 20 percent (from 60 events to 48 events) and the number of events proposed to use the new PA system at the full capacity would be reduced by approximately 61 percent (from 75 events to 29 events). Alternative C (Reduced Light and Public Address System Use) would achieve the project objectives to provide field lighting to accommodate "home" nighttime athletic competitions at Piner High School and would not require student athletes to leave class prematurely. However, the proposed reduction in PA system use on the visitor's side could decrease visitor attendance and result in lost revenue through ticket, refreshment, and booster club item sales. Therefore, Alternative C would not meet all of the objectives of the proposed project.

The District has developed the proposed project to represent the best possible balance between providing stadium lighting, pedestrian pathway lights, a new amplified public address system (PA system), and new visitor bleachers (up to 200 seats) at the Jim Underhill Stadium (project site) on the Piner High

SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
REPORT SUMMARY

School campus in Santa Rosa, California, consistent with the project objectives. Each of the alternatives have the potential to reduce the light and glare impacts and Alternative A and C have the potential to reduce operational noise impacts that have been identified in the Draft EIR. Overall, the alternatives analysis shows that none of the alternatives would result in a level of improvement that would completely avoid the temporary, but significant, impacts, that are associated with the proposed project.

**SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
REPORT SUMMARY**

TABLE 2-1 SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
Aesthetics			
Light and Glare (LG) Impacts The proposed project would introduce new sources of nighttime light and glare into the project area that would be noticeable to viewers in the surrounding area, particularly by residents in the homes along Quail Hollow Drive to the north, residential uses along Floral Way, Hickock Court, Marsh Court, and Cody Court to the east, and to a lesser extent residential uses to the east along Peterson Lane and adjacent roadways in the vicinity of the site.	S	<u>Mitigation Measure LG-1:</u> In addition to the existing trees planted along the northern and eastern sides surrounding the project site, the applicant shall consult with <u>residents adjacent to the project site in conjunction with consultation with a landscaping expert prior to the installation and operation of the lighting assemblies to determine the appropriate supplementary trees (i.e. non-deciduous trees) that would be necessary to screen and reduce the introduced light and glare impacts on the northern, eastern, and southern project perimeter.</u> Appropriate supplementary trees and landscaping shall consider the tree species, number of trees, and <u>timing for plantings (i.e. time of day and year)</u> as the addition of new non-deciduous trees could result in temporary shadows in the immediate project vicinity as the trees mature. Once the appropriate additional trees have been determined (i.e. tree species, number of trees, timing for plantings, shading considerations, etc.) the trees shall be planted according to the appropriate season as determined by the selected landscaping expert, which may be prior to the installation of the lighting assemblies or immediately following. The landscaping type, design and timing shall be established prior to the installation of the field lights. The supplementary trees and landscaping shall be maintained in perpetuity by the applicant.	SU
<p>Illumination of the field would also change the nighttime landscape and ultimately adversely effect nighttime views in the area for up to a five hour period. Light and glare impacts associated with the proposed field lights would be <i>significant</i>.</p>		<u>Mitigation Measure LG-2:</u> The applicant shall consult with residents adjacent to the project site prior to the installation and operation of the lighting assemblies to coordinate the appropriate type of fencing and install a fence along the northern and eastern perimeter of the project site. The fence type, design, and timing shall be established prior to the installation of the field lights.	

**SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
REPORT SUMMARY**

TABLE 2-1 SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
<p>Noise</p> <p>Operational Noise Impacts The proposed project would result in potential noise impacts from the use of the football field during evening hours instead of, or in addition to, weekdays and Saturdays. The major noise-generating components include the new PA system, and sports practices and events held during the evening hours. These evening games are expected to bring more spectators and associated traffic and would result in a significant operational noise impact.</p>	<p>S</p>	<p>Mitigation Measure LG-3: The applicant shall install Musco brand lights or any other brand that demonstrates comparable or better light performance and shielding of surrounding properties.</p>	<p>SU</p>

SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
REPORT SUMMARY

3 REVISIONS TO THE DRAFT EIR

This section presents specific changes to the text of the Draft EIR that are being made in response to comments made by the public and/or reviewing agencies. In each case, the revised page and location on the page is set forth, followed by the textual, tabular, or graphical revision. New text is double-underlined and text removed is shown in ~~strike through~~. None of the changes constitute significant changes to the Draft EIR, so the Draft EIR does not need to be recirculated.

A. *Table of Contents*

There are no changes to this section.

B. *1. Introduction*

There are no changes to this section.

C. *2. Summary*

The last paragraph on page 2-1 and continued on page 2-2 is hereby amended as follows:

The lighting system would consist of four, ~~6570-~~ 80-foot standards (poles) with light fixtures on each pole to allow use of the upgraded athletic stadium for night events. A lighted stadium would be used for football and soccer competitions, track meets and related practices. The standards would be installed symmetrically around the stadium in a square formation. The lighting standard design would use the Light Structure Green (LSG) system, which only requires ~~54 to~~ 50 1,500 watt metal halide high intensity discharge (HID) fixtures. The stadium would be lit between sundown and 10:00 p.m. and the lights would be manually switched off at 10:00 p.m., to avoid late night use.

Mitigation Measure LG-1 on page 2-4 in Table Summary of Significant Impacts and Mitigation Measures is hereby amended as follows:

Mitigation Measure LG-1: In addition to the existing trees planted along the northern and eastern sides surrounding the project site, the applicant shall consult with residents adjacent to the project site in conjunction with consultation with a landscaping expert prior to the installation and operation of the lighting assemblies to determine the appropriate supplementary trees (i.e. non-deciduous trees) that would be necessary to screen and reduce the introduced light and glare impacts on the northern, eastern, and southern project perimeter. Appropriate supplementary trees and landscaping shall consider the tree species, number of trees, and timing for plantings (i.e. time of day and year) as the addition of new non-deciduous trees could result in temporary shadows in the immediate project vicinity as the trees mature. Once the appropriate additional trees have been determined (i.e. tree species, number of trees, timing for plantings, shading considerations, etc.) the trees shall be planted according to the appropriate season as determined by the selected landscaping expert, which may be prior to the installation of the lighting assemblies or immediately following. The landscaping type, design and timing shall be established prior to the installation of the field lights. The supplementary trees and landscaping shall be maintained in perpetuity by the applicant.

D. 3. Project Description

The third paragraph on page 3-10 is hereby amended as follows:

In addition to the field event lighting, spectator lighting consisting of two 1,500 watt quartz fixtures, would be mounted on each of the 70- and 80-foot poles at approximately 25 feet above grade for the safety of the attendees during the nighttime events. Refer to Figure 3-5 for the proposed lighting plan and Figure 3-6 and 3-7 for a schematic representation of a single light pole and the associated lighting fixture characteristics, respectively. The spectator lighting would not be on at the same time as the field lighting and would only be applied after the field lighting is turned off for the safe exiting of spectators.

The last paragraph on page 3-10 and continued on page 3-14 is hereby amended as follows:

The lighting standard design uses the Light Structure Green (LSG) system, which only requires 50 ~~to~~ 1,500-watt metal halide high intensity discharge (HID) fixtures to maintain the recommended 50 footcandle (fc)¹ average. The LSG fixtures are able to concentrate more light on the field area with 50 percent less light emitted outside the targeted areas compared to non-LSG systems. Additionally, the LSG system can be designed to have the ability to be switched to a “dimmed” setting by selecting the upper or lower banks of light fixtures separately to achieve 40 to 60 percent of full light output. This feature will allow the lights to be turned on to full brightness during a football game and turned down during other events not requiring full brightness. For example, the lights can also be dimmed after the completion of an athletic event when less light is needed as team members exit the athletic field, spectators vacate the bleachers, and high school staff cleanup the area after a game. The proposed lighting system has a manual keyed switch for on-off control. This type of control would allow for proper lighting throughout the duration of the scheduled events.

E. 4.1. Impacts Found To Be Less Than Significant

The last paragraph on page 4.1-19 is hereby amended as follows:

The proposed project would incorporate the Light Structure Green (LSG) system as part of the project that would result in the reduction in GHG emissions. The LSG lighting standard design only requires 50 ~~to~~ 1,500-watt metal halide high intensity discharge (HID) fixtures to maintain the recommended 50 footcandle (fc)² average. The LSG fixtures are able to concentrate more light on the field area with 50 percent less light emitted outside the targeted areas. Additionally, the LSG system can be designed to have the ability to be switched to a “dimmed” setting by selecting the upper or lower banks of light fixtures separately to achieve 40 to 60 percent of full light output. This feature will allow the lights to be turned on to full brightness during a football game and turned down during other events not requiring full brightness.

The last paragraph on page 4.1-41 is hereby amended as follows:

In addition to the meeting the conventional Title 24 standards, the proposed project would apply environmentally sensitive lighting standard design by installing the Light Structure Green (LSG) system, which only requires 50 to 1,500 watt metal halide HID fixtures to maintain the recommended 50-fc² average. The LSG fixtures are able to concentrate more light on the field area with 50 percent less light emitted outside the targeted areas. Additionally, the LSG system can be designed to have the ability to be switched to a “dimmed” setting by selecting the upper or lower banks of light fixtures separately to achieve 40 to 60 percent of full light output. This feature will allow the lights to be turned on to full brightness during a football game and turned down during other events not requiring full brightness.

F. 4.2. Aesthetics

The third paragraph on page 4.2-18 is hereby amended as follows:

Due to the location of the poles, which is required for appropriate lighting on the playing field, the proposed lighting system does not have good cutoff characteristics to reduce the light spill into the neighboring areas along the ~~south~~ north fence line. The second type of glare (variance of illumination in the light field) is also not diminished by the cutoff nature of the lighting fixtures as there is still the possibility to view the very high illuminance inside the fixtures and the much brighter football field in comparison to the very dark surroundings that are characteristic of the project area. The bright exterior lighting sources, in fact, would be seen for several miles away.

The first paragraph on page 4.2-19 is hereby amended as follows:

Mitigation Measure LG-1: In addition to the existing trees planted along the northern and eastern sides surrounding the project site, the applicant shall consult with residents adjacent to the project site in conjunction with consultation with a landscaping expert prior to the installation and operation of the lighting assemblies to determine the appropriate supplementary trees (i.e. non-deciduous trees) that would be necessary to screen and reduce the introduced light and glare impacts on the northern, eastern, and southern project

perimeter. Appropriate supplementary trees and landscaping shall consider the tree species, number of trees, and timing for plantings (i.e. time of day and year) as the addition of new non-deciduous trees could result in temporary shadows in the immediate project vicinity as the trees mature. Once the appropriate additional trees have been determined (i.e. tree species, number of trees, timing for plantings, shading considerations, etc.) the trees shall be planted according to the appropriate season as determined by the selected landscaping expert, which may be prior to the installation of the lighting assemblies or immediately following. The landscaping type, design and timing shall be established prior to the installation of the field lights. The supplementary trees and landscaping shall be maintained in perpetuity by the applicant.

G. 4.3. Public Services

There are no changes to this section.

H. 4.4. Noise

There are no changes to this section.

I. 4.5. Traffic and Circulation

There are no changes to this section.

J. 5. General Impact Categories

There are no changes to this section.

K. 6. Alternatives to the Proposed Project

There are no changes to this section.

L. 7. Preparers and Persons Consulted

There are no changes to this section.

4 LIST OF COMMENTORS

A. Overview

This chapter lists the sources of all letters and comments received on the Piner High School Field Lighting Project Draft EIR during the respective 45-day public review period from January 24, 2011 to March 9, 2011.

B. List of Those Who Commented on the Revised Draft EIR

The District received a total of eight comment letters on the Draft EIR. Comment letters were divided into two categories: those submitted by public agencies and governments and those submitted by private organizations, companies, and individuals. Comment letters in each category were numbered according to the date they were received by the District. Individual comments within each comment letter were numbered. Thus, for example, the comment letter from the Department of Toxic Substances Control is numbered “1” and individual comments in that letter are numbered 1-1, 1-2, 1-3, etc.

Written comments made during the public review of the Draft EIR intermixed points and opinions relevant to the project’s merits with points and opinions relevant to the potentially significant environmental effects of the project. The responses acknowledge comments addressing points and opinions relevant to the project’s merits, and discuss as necessary the points relevant to the environmental review required by CEQA.

Table 4-1, Inventory of Comment Letters Received on the Draft EIR, lists the organizations and persons who provided written comments on the Draft EIR to the District during the 45-day public review period.

SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
 LIST OF COMMENTORS

TABLE 4-1 **INVENTORY OF COMMENT LETTERS RECEIVED ON THE DRAFT EIR**

Correspondence Number	Date of Correspondence	Commentor
Public Agencies and Governments		
1	February 28, 2011	Department of Toxic Substances Control, Harold (Bud) Duke
2	March 10, 2011	Office of Planning and Research, State Clearinghouse and Planning Unit, Scott Morgan
Private Organizations, Companies, and Individuals		
3	February 15, 2011	Thomas Hunt
4	February 28, 2011	Pamela Sorensen
5	March 8, 2011	Stephen P. Herndon
6	March 9, 2011	Bill and Sharon Graham
7	March 9, 2011	Grant Moulton
8	March 9, 2011	Diane Madrigal

5 RESPONSE TO COMMENTS

A. Overview

The purpose of the public review of the Draft EIR is to evaluate the adequacy of the environmental analysis in terms of compliance with CEQA. Section 15151 of the State CEQA Guidelines states the following regarding the standard from which adequacy is judged: “An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have not looked for perfection but for adequacy, completeness, and a good faith effort at full disclosure.”

The purpose of each response to a comment on the Draft EIR is to address the significant environmental issue(s) raised by each comment. This typically requires clarification of points contained in the Draft EIR. Section 15088 (b) of the State CEQA Guidelines describes the evaluation that CEQA requires in the response to comments by stating: “The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency’s position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.”

Section 15204(a) (Focus of Review) of the State CEQA Guidelines helps the public and public agencies to focus their review of environmental documents and their comments to lead agencies. Case law has held that the Lead Agency is not obligated to undertake every suggestion given them, provided that the agency responds to significant environmental issues and makes a good faith effort at disclosure. Section 15204.5(a) of the State CEQA Guidelines clarifies

this for reviewers by stating: “In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a Lead Agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

This guideline encourages reviewers to examine the sufficiency of the environmental document, particularly in regard to significant effects, and to suggest specific mitigation measures and project alternatives. Given that an effect is not considered significant in the absence of substantial evidence, subsection (c) advises reviewers that comments should be accompanied by factual support. Section 15204(c) of the State CEQA Guidelines states: “Reviewers should explain the basis for their comments, and, should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”

This chapter includes a reproduction of, and responses to, each letter received on the Draft EIR during the respective public review periods. Each letter is reproduced in its entirety, and is immediately followed by responses to the comments in it. Letters are categorized by type of commentor, with State and regional agencies first, and members of the public second. Within each

SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
RESPONSE TO COMMENTS

category, letters are arranged in chronological order. Each comment is labeled with a reference number in the margin, which correlates to a numbered response.

Where the same comment has been made more than once, a response may direct the reader to another numbered comment and response. Where a response required revisions to the Draft EIR, these revisions are shown in Chapter 3, Revisions to the Draft EIR, of this Final EIR.

SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
RESPONSE TO COMMENTS

B. Responses to Individual Comment Letters



Department of Toxic Substances Control

Linda S. Adams
Acting Secretary for
Environmental Protection

Leonard E. Robinson
Acting Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Edmund G. Brown Jr.
Governor

February 25, 2011

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FEB 28 2011
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SANTA ROSA CITY SCHOOLS

Mr. Doug Bower
Associate Superintendent
Santa Rosa City Schools District
211 Ridgeway Avenue
Santa Rosa, California 95401

DTSC COMMENTS ON THE PROPOSED DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED PINER HIGH SCHOOL FIELD LIGHTING PROJECT, 1700 FULTON ROAD, SONOMA COUNTY (SCH 2011011077)

Dear Mr. Bower:

The Department of Toxic Substances Control (DTSC) has reviewed the Proposed Draft Environmental Impact Report (Draft EIR) for the subject site (Santa Rosa City Schools District – January 24, 2011) received by DTSC on February 10, 2011. The proposed project is for the installation of field lights and additional visitor seating at the Jim Underhill Stadium on the Piner High School campus. The due date to submit comments is March 7, 2011.

1-1

Based on a review of the Draft EIR, DTSC would like to provide the following comments:

1. The project includes the installation and use of stadium and pedestrian pathway lights, additional visitor seating and an amplified public address system at the Jim Underhill Stadium on the Piner High School campus.
2. Because the project is school site related, DTSC recommends that an environmental review, such as a Phase I Environmental Site Assessment (Phase I) and/or Preliminary Endangerment Assessment (PEA), be conducted to determine whether there has been or may have been a release or threatened release of a hazardous material, or whether a naturally occurring hazardous material is present based on reasonably available information about the property and the area in its vicinity. Such an environmental review should generally be conducted as part of the California Environmental Quality Act (CEQA) process. Such an environmental

1-2

1-3

review is also recommended for compliance with the requirements of California Education Code, section 17268(a) or 17213(a).

1-3
cont.

3. Lead from lead-based paint, organochlorine pesticides (OCPs) from termiticide applications and polychlorinated bi-phenyls from electrical transformers may be potential environmental concerns in soils in the area of former and/or existing structures located at the site. DTSC recommends that these environmental concerns be investigated and possibly mitigated in accordance with DTSC's *"Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers, dated June 9, 2006."*

1-4

4. If the site was previously used for agricultural purposes, OCPs (e.g., DDT, DDE, toxaphene) and fertilizers (usually containing heavy metals) commonly used as part of agricultural operations are likely to be present. These agricultural chemicals are persistent and bio-accumulative toxic substances. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with the *"Interim Guidance for Sampling Agricultural Soils (Third Revision), dated August 2008"*.

1-5

5. The site may be located within 10-miles of a geological unit potentially containing naturally occurring asbestos (NOA). Pursuant to DTSC's *"Interim Guidance – Naturally Occurring Asbestos at School Sites, Revised September 24, 2004"*, further action, such as completion of a PEA, should be considered and conducted to determine whether a naturally occurring hazardous material (e.g., NOA) is present, based on reasonably available information about the property and the area in its vicinity. The PEA should be conducted as part of the CEQA process and prior to any approval or adoption of a Draft EIR for the project.

1-6

6. If the County plans to use State funds for the project, then the County shall comply with the requirements of Education Code sections 17213.1 and 17213.2, unless otherwise specifically exempted under section 17268.

1-7

DTSC is also administering the Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) Program which provides low-interest loans to investigate and cleanup hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. These loans are available to developers, businesses, schools, and local governments.


1-8

Mr. Doug Bower
February 25, 2011
Page 3

For additional information on DTSC's Schools process or CLEAN Program, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to discuss this matter further, please contact me at (916) 255-3695, or via e-mail at bduke@dtsc.ca.gov.

1-9

Sincerely,


Harold (Bud) Duke, PG
Senior Engineering Geologist
Northern California Schools & Permit Appeals Office

cc: (via e-mail)

State Clearinghouse
Office of Planning and Research
State.clearinghouse@opr.ca.gov

Mr. Michael O'Neill
Department of Education – Sacramento Office
Moneill@cde.ca.gov

Ms. Nancy Ritter
DTSC CEQA Tracking Center – HQ
NRitter@dtsc.ca.gov

Schools Reading File – Sacramento Office

CEQA Reading File - Chatsworth

**LETTER 1: Department of Toxic Substances Control, Harold (Bud) Duke.
February 28, 2011.**

- 1-1 This comment acknowledges the Department of Toxic Substance Control (DTSC) has reviewed the Draft EIR and introduces ensuing comments, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 1-2 This comment correctly provides a summary of the proposed project features, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 1-3 It is assumed that this comment is a DTSC-recommended action to adequately assess the project-related impacts regarding hazards and hazardous materials. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. As noted by the commentator, the DTSC recommends that an environmental review be conducted to assess if a release or threatened release of a hazardous material, or whether a naturally occurring hazardous material is present based on reasonably available information about the property and the area in its vicinity. This comment also contains information on mandated procedures that must be followed pursuant to California Education Code, Section 17268(a) or 17213(a). The project shall comply with all applicable local, State, and federal regulations.

The commentator is directed to Chapter 4.1, Impacts Found To Be Less Than Significant, of the Draft EIR. As noted beginning on page 4.1-26 under subheading “Hazards and Hazardous Materials”, the

project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment and is not on a list of active or restricted hazardous materials sites compiled pursuant to Government Code Section 65962.5. The proposed project would involve minimal amounts of typical hazardous materials associated with construction, such as fuel for the construction equipment used for the installation of lighting poles and fixtures. Additionally, no fuels or explosive materials would be stored on-site during the construction period. However, the hazardous materials amounts would be minor, used on a short-term basis, and would not create a significant hazard to the public or the environment. Further, as described on page 4.1-27, given the existing development within the project site and vicinity, as well as the minor excavating required under the proposed project, the possibility of disturbing contaminated soils or groundwater during construction is considered very low. According to the DTSC there are no active or restricted hazardous materials sites within the project site or surrounding vicinity.¹ The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

- 1-4 It is assumed that this comment is a DTSC-recommended action to adequately assess the project-related impacts regarding hazards and hazardous materials. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The use of Lead Based Paints (LBP) was federally banned by the Consumer Product Safety Commission in 1978. Therefore, only buildings built before 1978 are presumed to contain LBP, as well as buildings built shortly thereafter, as the phase-out of LBP was gradual. The project construction does not

¹ California Department of Toxic Substances Control, EnviroStor, Hazardous Waste and Substances Site List, www.envirostor.dtsc.ca.gov, retrieved March 17, 2011.

SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
RESPONSE TO COMMENTS

involve the demolition of any structures that would create a potentially significant impact related to release of LBP into the environment. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

1-5 It is assumed that this comment is a DTSC-recommended action to adequately assess the project-related impacts regarding hazards and hazardous materials. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The project shall comply with all applicable local, State, and federal regulations. However, given the existing development within the project site and vicinity, as well as the minor excavating required under the proposed project, the possibility of disturbing contaminated soils or groundwater during construction is considered very low. See Response to Comment 1-3.

1-6 It is assumed that this comment is a DTSC-recommended action to adequately assess the project-related impacts regarding hazards and hazardous materials. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The project shall comply with all applicable local, State and federal regulations. However, given the existing development within the project site and vicinity, as well as the minor excavating required under the proposed project, the possibility of encountering naturally occurring asbestos either at the project site or within 10-miles of a geological unit potentially containing naturally occurring asbestos is highly unlikely. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

1-7 This comment states that if the County plans to use State funds for the project, then the County shall comply with the requirements of

5-10

SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
RESPONSE TO COMMENTS

Education Code Sections 17213.1 and 17213.2, unless otherwise specifically exempted under section 17268. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The Santa Rosa City Schools District shall comply with all local, State and federal regulations applicable to the development of the proposed project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

- 1-8 This comment describes the DTSC's administration of Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) Program, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 1-9 This comment contains closing language for this comment letter. No response is required.



JERRY BROWN
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



COMMENT LETTER #2

March 8, 2011

Doug Bower
Santa Rosa City Schools
211 Ridgeway Avenue
Santa Rosa, CA 95401

Subject: Piner High School Field Lighting Project
SCH#: 2010032045

Dear Doug Bower:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 7, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

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2-1

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PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
RESPONSE TO COMMENTS

LETTER 2: Office of Planning and Research, State Clearinghouse and Planning Unit, Scott Morgan. March 10, 2011.

- 2-1 This comment informs the Lead Agency that the Draft EIR was submitted to select state agencies for review and confirms that the Lead Agency has complied with the review requirements of the State Clearinghouse pursuant to CEQA. This comment letter included a copy of Comment Letter 1, above, as an attachment. No response is required.

COMMENT LETTER #3

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02/13/2011 BUSINESS OFFICE
SANTA ROSA CITY SCHOOLS

D.E.I.R. Piner High School Field Lighting Project

Santa Rosa City Schools Board of Education, Ron Bower.

My name is Tom Hunt and I have lived at 2347 Marsh Court in Santa Rosa for the past eleven years. When I first moved to my residence in 2000 the Piner High School football field was a natural turf field primarily used for high school football games and the yearly graduation ceremony. Since that time the field has undergone a major transformation to an all weather sports complex with almost constant use from one group or another which is having a major detrimental impact on the quality of my life, and the value of my property. I have read the D.E.I.R report and reviewed all of the equipment and modifications that will be installed at Piner to illuminate the field and enhance the public address system. It appears to me along with the company who prepared the D.E.I.R. report that quality of my life and property value will be in certain jeopardy. As stated in the report, no matter what "mitigation measures" are taken to minimize the lights and sound there will still be "significant impact" to my residence and other homes in the immediate area surrounding the field. Currently the daily field use and ensuing noise has reached the level of intolerable. I can't imagine anybody expecting to add lights and enhanced sound system to think people could live; much less enjoy living in such close proximity to the field with these modifications.

3-1

In closing I would like to express my sincerest hope that these problems can be worked out to the satisfaction of all parties. I am available to discuss any of these issues and can be reached at my home or office anytime.

Sincerely

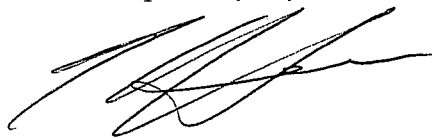
Thomas Hunt

2347 Marsh Court

Santa Rosa CA 95403

Home phone (707) 569-1669

Office phone (707) 781-9012 6:30AM- 3:00 PM



LETTER 3: Thomas Hunt. February 15, 2011.

- 3-1 This comment contains general information on the commentor themselves and expresses an opinion about approval of the proposed project and about the project's impact on their personal well being and property value, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The Draft EIR is not meant to address personal well being, economic or financial issues, or the market demand for the project. Rather, the purpose of CEQA and the Draft EIR is to fully analyze and mitigate the project's potentially significant physical impacts on the environment. As such, the comment addresses concerns outside of the scope of the Draft EIR.

Further the purpose of CEQA is to inform governmental decision-makers and the public about the potential significant environmental effects of proposed activities. A significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project. CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible (Section 15021), which includes the consideration and inclusion of feasible alternatives and mitigation measures. The proposed project's environmental impacts, associated mitigation measures and level of significance after mitigation were summarized in Table 2-1, Summary of Significant Environmental Impacts and Mitigation Measures on Page 2-4 of the Draft EIR and repeated on page 2-8 of this Final EIR. As provided in this table, light and glare and operational noise impacts associated with the proposed project would be significant and unavoidable even after the implementation of various mitigation measures.

Per Section 15093(b,c) of the CEQA Guidelines, when the Lead Agency approves a project which will result in the occurrence of significant effects, which are identified in the Final EIR, but are not avoided or substantially lessened, the agency shall state in writing the

SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
RESPONSE TO COMMENTS

specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record. If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

With respect to the portion of the comment that states that the preparers of the Draft EIR are in agreement with the commentor's position on the project's impacts on the commentor's quality of life and property value, the preparers of the Draft EIR make no such statement. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

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FEB 28 2011

BUSINESS OFFICE
SANTA ROSA CITY SCHOOLS

2424 Quail Hollow Drive
Santa Rosa, CA 95403
February 24, 2011

Santa Rosa City Schools
Doug Bower, Associate Superintendent
211 Ridgway Avenue
Santa Rosa, CA 95401

Dear Mr. Bower,

I am still concerned about the possibility of lights on the football field. Our back fence is in worse shape than ever before and it is not getting any better. I remember that the issue of replacing the fence or putting up sound protection was mentioned at the start of this process, but I have seen no progress in that direction with or without the lights. Below is the same letter that I sent to you in April 2010.

As a neighbor to Piner High School as well as an employee there, it is difficult to write this letter. As a teacher at Piner High, I understand why the school is interested in having lights on the football field. However, as a neighbor with my backyard adjacent to the junior varsity baseball field, I have to say that I am not in favor of the lights at Piner High School.

When I purchased my house on Quail Hollow, I did not realize the extent of outside use of the fields. I have dealt with many years of noise, extremely rude coaches and parents, and damage to my fence because of the activity that is allowed on the field.

I spoke at a Board Meeting when the proposal for lights was first addressed and mentioned my concerns at that time. I mentioned that the parents of PAL would cause my dog to bark on purpose and that they were extremely rude as well as the fact that they pound on the fence and would throw things over the fence into my yard (mouthpieces, garbage). I also indicated that several of the fence boards had been damaged by either people or baseballs/footballs or both. At that meeting, the Board discussed a barrier of sorts to construct between the houses and the fields to help with the noise and the damage being done to the fences. Nothing has been done to date about that matter. The noise and damage continue.

I strongly feel that the addition of lights to the field will add to the noise that the neighbors of Quail Hollow already have to contend with. Sometimes the loud speakers start as early as 7 a.m. on Saturday and Sunday mornings. If the lights are approved, the noise could continue well into the night. (We also hear the noise from Grad Night which is held in the gym, not to mention the cars racing in the parking lot at all hours of the night, any night!)

4-2

Although there are very few "home" games, this does not stop the use of the fields to be used by other agencies. Thus the lights will be on more than just during football season. It is my opinion that the District should have thought about limiting construction of the fields with lights and SHARE the fields for maximum usage. Having a field at each site is a tremendous expense. These funds could have been directed to the classroom.

4-3

In addition, I feel as though there is less mischievous activity taking place during day games than what will take place at night games.

4-4

And lastly, when I purchased my home in 1987, I was told that there was an agreement that lights would NOT be put on the field at Piner High School. I am not sure what happened to that agreement.

4-5

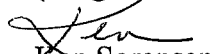
Thank you for hearing my comments. I do hope that the District will once again consider the construction of a barrier between the fields and the fences.

4-6

Sincerely,



Pamela Sorensen
(Neighbor and Piner Teacher)



Ken Sorensen
(Neighbor)

LETTER 4: Pamela Sorensen. February 28, 2011.

- 4-1 This comment contains general information on the commentor themselves and expresses a concern about the merits of the project planning process, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. No response is required. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 4-2 This comment expresses a concern about the noise impacts associated with the development of the proposed project and the schedule of events, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. As described in detail in on Table 3-1, Jim Underhill Stadium Existing and Proposed Annual Events, on page 3-17 through -19 in Chapter 3, Project Description, of the Draft EIR, scheduled events at the project would begin as early as 9 a.m. and end at 10 p.m. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 4-3 This comment expresses a concern about the use of the project by agencies other than Piner High School and the merits of the project planning process, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. As described in detail in on Table 3-1, Jim Underhill Stadium Existing and Proposed Annual Events, on page 3-17 through -19 in Chapter 3, Project Description, of the Draft EIR, events at the project would be those of Piner High School or the Police Athletic League (PAL) football games, which are the only non-school sponsored activity permitted on the site. The Draft EIR is not meant to address economic or financial issues of the project. Rather, the purpose of CEQA and the Draft EIR is to fully analyze

and mitigate the project's potentially significant physical impacts on the environment. See Response to Comment 3-1. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

4-4 This comment expresses an opinion and speculates that less mischievous activity takes place during the day games than during night games, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The commentor is directed to Chapter 4-3, Public Services, of the Draft EIR. As described on page 4.3-3 and continued on page 4.3-4 the Santa Rosa Police Department reported activities such as littering, loitering in the adjacent neighborhood, trespassing and public urination yielded zero such calls during the 2009-10 football season (10/1/09 to 3/31/10) in an area immediately surrounding Piner High School, including residential parcels adjacent to the football field. In addition, during the past three years, no incidents have occurred at high school night games where such field lighting has been installed. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

4-5 This comment describes an agreement that no lights would be installed on the project site, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. No response is required. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

4-6 This comment contains closing language for this comment letter. No response is required.

COMMENT LETTER #5

Santa Rosa city Schools
Attn: Doug Bower, Associate Superintendent
211 Ridgeway Avenue
Santa Rosa, CA 95401

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SANTA ROSA CITY SCHOOLS

It is inconceivable that a project of this scope, and its negative impact on the environment, would be given any serious consideration by the Santa Rosa City Schools. Indifferent to the current status of any private, government and personal financial budgets, this project fails to demonstrate anything but an emotional desire to have "lighting" with no other benefit that overcomes the damage created by the project. It has been represented that "substantial" revenue would be achieved for the night time use of the stadium. This representation is void of any detailed cost benefit analysis. And any analysis would need to include a use beyond its intended creation by expanding the operation of the nighttime use and therefore further impact the consequences of the stadium lights. It should be noted that this stadium, unlike any of the other local stadiums that have recently added lights, sits directly ON TOP of its neighborhood with no way to add any kind of buffer, mitigating or otherwise. The resultant harm to the neighborhood far outweighs any immediate and future monetary award. Santa Rosa City Schools are subjecting themselves to litigation themselves for the introduction of these negative impacts which are clearly stated and acknowledged in the draft of the Environmental Impact report. These impacts include, but are not limited to, the following;

5-1

- **CUMULATIVE NOISE:**

The city of Santa Rosa general plan and the state of California general plan guidelines, any project that anticipates CNEL of 60 decibels would not be acceptable for residential use. It would be impossible to guarantee to the existing neighborhood that the decibel level for any future evening event would be either monitored or contained.

The draft EIR clearly states that even after any imposed mitigation measures, the crowd noise would be **SIGNIFANT and UNFAVORABLE!** Let's be real here, this stadium sits on top of the majority of its neighbors with those bordering the stadium able to reach across their fence and touch the stadium seating and proposed light standards.

5-2

- **LIGHTING**

New sources of night time lights and glare will substantially affect the surrounding neighborhood and the quality of life of its residents. The draft EIR admits the adverse effects will be **SIGNIFICANT** and the proposed mitigation measures will not erase these effects. The draft EIR states "Tree" planting **MAY** be prior to the installation of the lights. There is no assurance any trees planted would mitigate the light until many years in the future and would provide no immediate benefit to the surrounding neighborhood. That is if there is a place to plant them keeping in mind the proximity of the majority of the homes relative to the stadium.

5-3

- **PROPERTY VALUES**

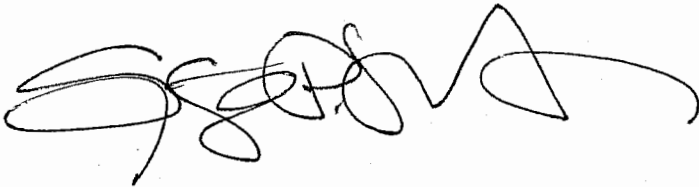
The report does not adequately address the adverse effect the substantial lighting and noise imparts will have on property values. Who would choose to purchase a home and live within the area of such facility? Who would choose to rent a home in such an area?

These impacted neighborhoods have existed many years prior to any suggestion of a lighted outdoor stadium. Their rights to peaceful, quiet existence as well as maintenance of their property values must be protected at all costs. Their rights take precedence and are not subordinate to the schools' economic benefits.

The time for thoughtful consideration must be BEFORE this project has begun and NOT AFTER the neighborhoods have been irreparably damaged.

Unless the school district is in a financial position to purchase outright the affected properties, or to provide monetary restitution for the loss of their resultant devaluation, it is recommended the project be postponed or eliminated.

Respectfully,



Stephen P. Herndon
2345 Hickock Court
Santa Rosa, CA 95403

LETTER 5: Stephen P. Herndon. March 8, 2011.

- 5-1 This comment expresses an opinion about the approval of the proposed project and about the project's benefits and economic value, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The Draft EIR is not meant to address economic or financial issues or the market demand for the project. Rather, the purpose of CEQA and the Draft EIR is to fully analyze and mitigate the project's potentially significant physical impacts on the environment. As such, the comment addresses concerns outside of the scope of the Draft EIR. See Response to Comment 3-1. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 5-2 This comment expresses an opinion regarding containment and monitoring of crowd noise levels during evening games at Piner High School, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The commentator states that CNEL of 60 decibels would not be acceptable for residential use. However, as described in Table 4.4-1, Land Use Compatibility Standards, City of Santa Rosa General Plan, on page 4.4-3 of the Draft EIR, an L_{dn} or CNEL of 60 dBA or less is normally acceptable for single family residential development and a CNEL of 60 to 70 dB is considered "conditionally acceptable" according to the City of Santa Rosa General Plan. As described on page 4.4-3, conditionally acceptable is defined as the new construction of development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

- 5-3 This comment expresses an opinion regarding the impacts of the nighttime light and glare, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment correctly states the light and glare impacts associated with the project would be significant. As noted in Chapter 4.2, Aesthetics, on page 4.2-22 even with the application of specific lighting standards and the required Mitigation Measures LG-1 through LG-3, the lighting may be considered obtrusive to some neighbors and would still create a new source of substantial light or glare, which for the 60 times a year that the lights would be used would adversely affect nighttime views in the area. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 5-4 This comment expresses an opinion about the approval of the proposed project and about the project's benefits and economic value, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Responses to Comments 3-1 and 5-1.

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SANTA ROSA CITY SCHOOLS

William Graham
2349 Hickock Court
Electronic Warfare Tech. USAF
Radio/TV Sound Tech.
Bio medical Electronics Tech.
Hospital Safety Officer
Co Owner – Graham’s Nursery and Plant Shop
Co Owner - Good “N” Clean Coin Laundries
Chairman – Piner Neighborhood Preservation Group

Sharon Graham
2349 Hickock Court
Title Officer
Title Operations Manager
Escrow Officer
Notary Public
Co Owner – Graham’s Nursery and Plant Shop
Co Owner – Good “N” Clean Coin Laundries

This is our response and comments for the Piner Lights Project – Draft Environmental Impact Report (DEIR)

Aesthetics, Privacy and Proximity Issues

The Draft Environmental Impact Report (DEIR) considers the installation of stadium light poles aesthetically to be less than a significant impact – To neighbors at the ends of Cody Ct, Marsh Ct, Hickock Ct having a 70ft – 80ft pole approximately 6 feet from their fence is very significant.

6-1

The broken slatted chain link fence on the East side offers little relief from spectators peering into neighbors yards/homes and harassing our pets.

6-2

Migation- Install a solid wall for privacy. This is necessary even for continued daytime activities at sports fields from the LDS church to Quail Hollow Homes.

The Visitors’ Bleachers allow spectators to look into neighbors yards and homes –

6-3

A plan to install shielding to the back of bleachers that would block views of the neighbors yards/homes on the East, from spectators sitting or standing on bench seats. This plan should be made available (in the DEIR) to neighbors, decision makers and other interested parties.

The DEIR states that Piner High School is the only high school in Santa Rosa without stadium lights but it fails to state the unique distance relationship between “Neighbors” and Piner’s stadium.

6-4

The number of homes from each stadium light pole (specific distance in feet) should be calculated then compared to the other 4 Santa Rosa High Schools and made available (in the DEIR) to neighbors, decision makers and other interested parties.

The number of homes (specific distance in feet) from primary noise sources (home and visitor bleachers) should be calculated then compared to the other 4 Santa Rosa High Schools and made available (in the DEIR) to neighbors, decision makers and other interested parties.

Light Trespass, Glare and Visual Impact

Number of Luminaries’ required – At different places in the DEIR it states that 50 or 54 lights would be needed (a difference of 6,000 watts of light)

6-5

This needs to be clarified and made available (in the DEIR) to neighbors, decision makers and other interested parties.

Spectator Lights (25 feet from ground and 2 per Pole). Which direction would these lights (3,000 watts on each pole) be pointed?

6-6

The light trespass, glare, and overall impact of spectator lights needs to be calculated and made available (in the DEIR) to neighbors, decision makers and other interested parties.

6-7

1085

Total wattage of illumination – 50 luminaries’ (with spectator lights) = 87,000 watts. 54 luminaries’ (with spectator lights) = 93,000 watts. This illumination value needs to be included in the DEIR then made available to neighbors, decision makers and other interested parties.

6-8

Glare and vehicle movement on streets to the East and North – What is the effect on drivers on the following Streets: Cody Court, Marsh Court, Hickock Court, Peterson Lane, Floral Way, Bronco St, Quail Hollow Dr, and Pinercrest St. This condition needs to be evaluated and made available (in the DEIR) to neighbors, decision makers and other interested parties.

6-9

Horizontal/Vertical Light Spill (light trespass)- The Draft EIR states a maximum Horizontal spill of 9.48 foot candles and Vertical spill of 12.65 foot candles at about 70 feet from the field’s playing surface (Horizontal average 3.48/Vertical average 5.78) this distance puts that amount of light at about 20 feet into neighbor’s yards and very close to the walls of their homes. The value of light spill at 100 feet, 150 feet and 200 feet from the playing field needs to be calculated in foot candles and made available (in the DEIR) to neighbors, decision makers and other interested parties.

6-10

The DEIR states that cutoff of lights is not very good at the South end of stadium. Wouldn’t this be the same for the north end? This needs to be clarified in the DEIR and made available to neighbors, decision makers and other interested parties.

6-11

Spill and Glare Visor Bounce Back – Depending on the angle of the Luminarie Assemblies and due to the close proximity of homes, light may reflect back at a geometric angle, illuminating neighboring houses. This value should be calculated and made available (in the DEIR) to neighbors, decision makers and other interested parties.

6-12

Mitigating glare, light trespass and visual impact with trees (only viable option) The value of this option would only be effective at maturity of trees, depending on the starting size of trees this could be 10-20 years; This time period should be stated in the Draft EIR then made available to neighbors, decision makers and other interested parties.

6-13

The DEIR should state the numerous impacts from the trees themselves - Unwanted shade, blocking of solar systems and closed in (Claustrophobic) feeling. Then make this information available (in The DEIR) to neighbors, decision makers and other interested parties.

6-14

The DEIR relies heavily on existing trees in neighbor’s yards, this is a improper expectation of neighbors to mitigate unwanted effects from Piner’s Stadium Light Project and may lead to neighborhood conflicts (Neighbor “A” cuts down tree Neighbor “B” depends on). Because the Stadium Light Project would be; Planned, initiated, installed and used by and for Piner High School, blocking of environmental impacts from lights would be solely the responsibility of Piner.

6-15

The DEIR should include a detailed plan for the use of trees to mitigate Light Trespass and Glare. The plan should be made available (in the DEIR) to neighbors, decision makers, other interested parties and should include at least the following:

6-16

1. A row of trees on the Eastern and Northern fence lines, spaced a maximum of 20 feet apart.
2. Trees will be similar to Redwood or Douglas Fir with irrigated minimum growth rate of 4 feet per year.
3. Minimum planting size of 24” box and 15 feet high
4. Cluster of trees between the two poles on the East side and neighbors fence.

ALL trees would be maintained in perpetuity by Piner High School.

205

Noise and PA System

Background Information on Noise

Noise may be defined as unwanted sound. Noise is usually objectionable because it is disturbing or annoying. The objectionable nature of sound could be caused by its *pitch* or its loudness. *Pitch* is the height or depth of a tone or sound depending on the relative rapidity (frequency) of the vibrations by which it is produced. Higher pitched signals sound louder to humans than sounds with a lower pitch. *Loudness* is intensity of sound waves combined with the reception characteristics of the ear. Intensity may be compared with the height of a ocean wave in that it is a measure of the amplitude of the sound wave.

In addition to the concepts of pitch and loudness, there are several noise measurement scales which are used to describe noise in a particular location. A *decibel (dB)* is a unit of measurement which indicates the relative amplitude of a sound. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Sound levels in decibels are calculated on a logarithmic basis. An increase of 10 decibels represents a ten-fold increase in acoustic energy, while 20 decibels is 100 times more intense, 30 decibels is 1,000 times more intense, ect.

6-17

Effects of Noise

Sleep and Speech Interference

The thresholds for speech interference indoors are about 45 dBA if the noise is steady and above 55 dBA if the noise is fluctuating. Outdoors the thresholds are about 15 dBA higher. Steady noise of sufficient intensity (above 35 dBA) and fluctuating noise levels above about 45 dBA have been shown to affect sleep. Interior residential standards for multi-family dwellings are set by the State of California at dBA *Ldn*. Typically, the highest steady traffic noise level during the daytime is about equal to the *Ldn* and nighttime levels are about 10 dBA lower. The standard is designed for sleep and speech protection and most jurisdictions apply the same criterion for all residential use. Typical structural attenuation is 12-17 dBA with open windows. With closed windows in good condition, the noise attenuation factor is around 20 dBA for older structures and 25 dBA for a newer dwelling. Sleep and speech interference is therefore possible when exterior noise levels are about 57-62 dBA *Ldn* with open windows and 65-70 dBA *Ldn* if the windows are closed.

6-18

There is always Speech and Sleep interference when Piner High or PAL Football Games are being played at Underhill Stadium during daytime hours. With a maximum level of 65 dBA for night games, as stated in the DEIR, sleep and speech interference would be a definite probability.

6-19

Starter Pistils are an extreme source of Disturbing Noise.

Mitigation – Only Track & Field Meets where Piner High Students participate should be allowed at Underhill Stadium.

Mitigation – Starter Pistils only fired on the West side of track.

6-20

Sound Generating Devices (Air Horns) are an extreme source of Disturbing Noise.

Mitigation- Ban Sound Generating Devices from all Football, Soccer, and Baseball Fields/Bleachers.

6-21

PAL Football Games are an extreme source of Disturbing Noise to the Neighbors of Piner High School. (Up to ten hours on Sundays including setup, player warm-ups, and kids on metal bleachers as early as 7 AM).

Mitigation – Move PAL Football Games to Elsie Allen High or Cardinal Neuman High (This would eliminate Unwanted Noise on Sundays as per the Santa Rosa City Sound Ordinance)

6-22

3005

PA Speakers (Horns) are an extreme source of Disturbing Noise

Mitigation – Even with the so called Engineered PA System, speakers should not be pointed towards the homes on the East side of Underhill Stadium.

6-23

In order to get above Crowd Noise the PA system would be turned up in conjunction with an increased number of spectators.

Estimated PA Levels for 500, 1000, and 1500 spectators should be included in the DEIR and made available to neighbors, decision makers and other interested parties.

6-24

The only way to reduce some of the unwanted noise in nearby homes (even for daytime football games) would be a Sound Wall.

Although a Sound Wall has its own negative effects, most yards have a 6ft wooden fence and many home owners extend them up to 8ft, so a wall would not be that unpleasant.

6-25

The Santa Rosa City School board should direct Piner High School to use the Santa Rosa Code for noise (Santa Rosa City code – Title 17 – Environmental Protection: Chapter 17-16 Sections 16.010, 16.030, 16.040, 16.090, 16.160, and 16.170) as a standard for noise generated on its’ sports fields. This Noise Ordinance was used as a reference point in the DEIR.

6-26

Additionally – In the 2009-2010 Final Grand Jury Report, a recommendation (R-4) was made to the Santa Rosa School District (SRSD) and Santa Rosa American Little League (SRALL) (Baseball Games at Monroe Elementary School) as follows:

R -4 That the SRSD and SRALL each month during the term of the agreement jointly measure and record the crowd noise level to ensure it falls within the **City of Santa Rosa’s ambient noise level criteria**. In the event there are concerns over excessive noise or vehicle related activities, SRDS and SRALL should jointly review the camera system’s audio and visual for the period of the concerns. It will be SRALL’s responsibility to take necessary corrective action if the concern was the result of SRALL related actions.

6-27

Piner High School Alleviation Responsibilities
As suggested by Piner Neighborhood Preservation Group

Piner High School (PHS) should show proof to the Santa Rosa School Board (SRSB) and neighbors that noise levels will not exceed the Santa Rosa City Noise Ordinance ambient and average levels for future sports activities. If PHS can’t maintain a 65 dBA level at its neighbors fence lines the stadium light project should not be approved.

PHS should prove to SRSB and neighbors that light spill (light trespass) from stadium lights will not reach the exterior walls of the homes to the East and North of the stadium. If PHS can’t guaranty no light trespass reaching homes, stadium light project should not be approved.

6-28

PHS should prove to the SRSB and neighbors that high levels of glare will not exist in yards, homes and streets with stadium lights on. If PHS can’t prove glare will not exist the stadium lights project should not be approved.

PHS should show proof to SRSB and neighbors that a loss of property values will not occur because of lights, noise, trees, or sound wall (a review by 2 Certified appraisers and 2 Real Estate Brokers) if PHS can’t prove no loss of property values will occur the stadium light project should not be approved.

475

PHS should prove to SRSB and neighbors that no on street parking during night games (Peterson Lane Corridor) will occur. If PHS can't show proof (plan) the stadium light project should not be approved.

PHS should show proof to the SRSB and neighbors that funding exists to install a sound wall (as recommended in the DEIR) prior to public hearings on the stadium light project. If no funding exists the stadium light project should not be approved.

PHS should show proof to SRSB and neighbors before public hearings that funding exists to plant a wall of trees (disregarding neighbor's trees) in sufficient quantities and size to block light & glare within 10 years. If no funding exists, the stadium light project should not be approved.

We have lived here 31 years and planned to be here for the rest of our lives. But, it seems PHS disregard for our quality of life, will eventually force us to move. Of course, we expected sports activities (football games) when we moved next to a high school. But, we don't know any neighbors who said to themselves that Piner High School is going to ruin many of our Sundays in the fall, then put intense lights over our heads, illuminate our yards/homes and ruin up to sixty nights a year. We ask ourselves will we be able to put our granddaughter to bed a 8 PM? Will we be able go to bed early enough to tend our businesses at 6 AM in the morning? Can we get someone to buy our home with that wonderful ornament (stadium pole/light) in the backyard.

What Piner High School really needs is to:

Improve their scholastic scores (just above Elsie Allen) believe it or not, parents of athletes want their kids to get a good education also.

Get some decent Football coaches (we can hear and see from our yard) four letter words do not equal quality coaching.

Get a Booster Club that is interested in building and supporting teams not just in profits from the gate and hot dogs.

We would be more than happy to meet with any or all board members at Underhill Stadium.

Thanks

Bill and Sharon Graham
Graham_bill2349@sbcglobal.net

6-28
cont.

6-29

5085

LETTER 6: Bill and Sharon Graham. March 9, 2011.

- 6-1 The commentor expresses opinions regarding the height of the proposed project's lighting standards, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR.
- 6-2 This comment expresses a concern regarding the existing fencing between the project site and the adjacent residential development and suggests mitigation to prevent potential spectators from peering into the neighbor's yards and harassing their pets. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR.
- 6-3 This comment expresses a concern regarding the proposed project's visitor bleachers and suggests mitigation to block visiting spectators from viewing the neighbor's yards to the east of the project site. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR.
- 6-4 This comment expresses a concern regarding the proximity of the project to the neighboring homes in comparison to the proximity of other field lighting projects to those perspective neighbors. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. Each project's environmental analysis is based on the project's site and surroundings independent of other similar projects in the District.
- 6-5 This comment correctly identifies that the lighting standard design for the proposed project would use the Light Structure Green (LSG) system, which only requires 50-1,500 watt metal halide high intensity

discharge (HID) fixtures to maintain the recommended 50 footcandle (fc) average. The discussion on page 2-2 regarding the requirement of 54-1,500 watt metal halide (HID) fixtures has been revised as shown in Chapter 3, Revisions to the Draft EIR, of this Final EIR. These revisions do not affect any conclusions or significance determinations provided in the Revised Draft EIR.

- 6-6 This comment requests information regarding the direction the spectator lights would be pointed, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. All spectator lights would be pointed down toward the project site in the same fashion as the fixtures shown on Figure 3.6, Light Pole Schematic 14 Fixtures and Figure 3.7, Individual Fixture Assembly, on pages 3-12 and 3-13, respectively.
- 6-7 This comment requests the impacts of light trespass, glare, and overall impacts of spectator lighting be calculated and made available (in the Draft EIR) to neighbors, decisionmakers and other interested parties. The commentor is directed to Chapter 4.2, Aesthetics, for a complete discussion and analysis on the lighting impacts, including spectator lighting, of the project beginning on page 4.2-9 and continuing through 4.2-19. As described on page 4.2-10 and -11, the intent of the proposed lighting design is to meet the 50 footcandle (fc) average Class II requirement as described in Chapter 20, Sports and Recreational Area Lighting, of the Illuminating Engineering Society of North America (IESNA) Lighting Handbook, which provides recommendations for the amount of light required for nighttime sporting and recreational high school events. The Class II requirement level is appropriate for effective visual observation by no more than 5,000 spectators.

Additionally, the proposed 70- and 80-foot pole height is necessary to maximize the effectiveness of lighting the field uniformly and evenly

for the benefit of spectators; to minimize discomfort glare for spectators by placing the lights above the typical viewing field; and to minimize light pollution and spill by aiming the fixtures closer to vertically down.

The spectator lighting would not contribute to the light impacts associated with field lighting analyzed in the Draft EIR. The spectator lighting would not be on at the same time as the field lighting and would only be applied after the field lighting is turned off for the safe exiting of spectators. According to Musco Lighting Engineer Bob Crookham, it is estimated that the spectator lighting would generate 5 footcandle average. The text on page 3-10 in the Draft EIR has been revised to reflect the use of the spectator lighting. These revisions do not affect any conclusions or significance determinations provided in the Revised Draft EIR.

6-8 This comment requests the total wattage of illumination be included in the EIR and be made available to neighbors, decisionmakers, and other interested parties. See Response to Comment 6-7.

6-9 This comment requests information regarding light and glare impacts for drivers using Cody Court, Marsh Court, Hickock Court, Peterson Lane, Floral Way, Bronco Street, Quail Hollow Drive, and Pinercrest Street. The commentor is directed to Chapter 4.2, Aesthetics, for a complete discussion and analysis on the lighting impacts, including spectator lighting, of the project beginning on page 4.2-9 and continuing through 4.2-19. As discussed on page 4.2-18, the lighting sources would be seen from several miles away. The proposed project would introduce new sources of nighttime light and glare into the project area that would be noticeable to viewers in the surrounding area, particularly by residents in the homes along Quail Hollow Drive to the north, residential uses along Floral Way, Hickock Court, Marsh Court, and Cody Court to the east, and to a lesser extent residential uses to the east along Peterson Lane and adjacent

roadways in the vicinity of the site (including those listed by the commentor). As identified in the Draft EIR, illumination of the field would also change the nighttime landscape and ultimately adversely affect nighttime views in the area for up to a five hour period. Light and glare impacts associated with the proposed field lights would be significant. However, the proposed pole locations are not in the direct field of vision for a driver on the streets identified above and the lights would not be directed onto the roadways adjacent to the project site.

- 6-10 This comment requests that light and glare impacts at distances of 100, 150, and 200 feet from the playing field be calculated in foot candles and made available in the Draft EIR. Section 15204(a) of the State CEQA Guidelines (“CEQA Guidelines”) (Focus of Review) states:

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

As described by the commentor and in the Draft EIR, the proposed lighting system is designed to spill a maximum of 9.48 fc and an average of 3.48 fc is designed to spill a maximum of 12.65 fc and an average of 5.78 fc as measured approximately 70 feet from the edge of the football playing surface. As impacts were found to be significant at this distance, no additional analysis is warranted.

- 6-11 This comment requests clarification that cutoff of lights is not very good at both the north and south end of the project site and not only the south end as indicated in the Draft EIR. The discussion on page 4.2-18 regarding the cutoff at the south fenceline has been revised as shown in Chapter 3, Revisions to the Draft EIR, of this Final EIR. The text referring to the south fenceline should have referred to the north fenceline due to the close proximity of the homes at the north end of the project site. These revisions do not affect any conclusions or significance determinations provided in the Revised Draft EIR.
- 6-12 This comment requests additional analysis regarding light reflection at a geometric angle. Light reflection would occur when a light ray hits a flat reflecting surface. A football field is not considered a reflective surface and no such analysis is warranted. See Response to Comment 6-10.
- 6-13 This comment requests the details regarding planting age and maturing age of the trees to be planted under required Mitigation Measure LG-1 discussed on page 4.2-19 in Chapter 4.2, Aesthetics, of the Draft EIR be analyzed in the EIR. As the applicant has not prepared a detailed landscaping plan it not known what type of trees would be planted at this time. Certain project details, by necessity, would be determined during design review. CEQA does not require a project to mature to its precise final form before it is studied. Instead, CEQA review must occur “before a project gains irreversible momentum” (*City of Antioch v. City of Pittsburg* (1986) 187 Cal.App.3d 1325, 1333-1334). In other words, CEQA requires agencies to pre-

pare EIRs “as early as feasible in the planning process to enable environmental consideration to influence project program and design and yet late enough to provide meaningful information for environmental assessment” (see CEQA Guidelines Section 15004, subd. (b); *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1358). However, despite such project details not being required at this juncture in the project process or for CEQA analysis, the project applicant has accounted for potential adverse impacts resulting from the planting of new trees along the project perimeters as required in Mitigation Measure LG-1.

As stated in Mitigation Measure LG-1, the applicant is required to consult with a landscaping expert prior to the installation and operation of the lighting assemblies to determine the appropriate supplementary trees (i.e. non-deciduous trees) that would be necessary to screen and reduce the introduced light and glare impacts on the northern, eastern, and southern project perimeter. As described in Mitigation Measure LG-1, the appropriate supplementary trees and landscaping shall consider the tree species, number of trees, timing for plantings (i.e. time of day and year) as the addition of new non-deciduous trees could result in temporary shadows in the immediate project vicinity as the trees mature. Once the appropriate additional trees have been determined (i.e. tree species, number of trees, timing for plantings, shading considerations, etc.) the trees shall be planted according to the appropriate season as determined by the selected landscaping expert, which may be prior to the installation of the lighting assemblies or immediately following. The landscaping type, design, and timing shall be established prior to the installation of the field lights. The supplementary trees and landscaping shall be maintained in perpetuity by the applicant.

As noted on page 4.2-22, even with the application of specific lighting standards and the required Mitigation Measures LG-1, the lighting may be considered obtrusive to some neighbors and would still

create a new source of substantial light or glare, which for the 60 times a year that the lights would be used would adversely affect nighttime views in the area. Therefore, light and glare impacts would be significant and unavoidable after mitigation. Nonetheless, Mitigation Measure LG-1 has been revised on page 4.2-9 to require the applicant to consult with residents adjacent to the project site in conjunction with consultation with the landscaping expert prior to the installation and operation of the lighting assemblies to determine the appropriate supplementary trees. This revision is shown in Chapter 3, Revisions to the Draft EIR, of this Final EIR. These revisions do not affect any conclusions or significance determinations provided in the Revised Draft EIR.

6-14 This comment requests the details of the trees to be planted under required Mitigation Measure LG-1, discussed on page 4.2-19 in Chapter 4.2, Aesthetics, of the Draft EIR, be analyzed in the EIR. See Response to Comment 6-13.

6-15 This comment incorrectly interprets the discussion in the Draft EIR under Mitigation Measure LG-1 regarding the existing trees planted along the northern and eastern sides surrounding the project site as being required to be a part of the mitigation. It is the intent of Mitigation Measure LG-1 to consider the existing trees in the design of the proposed landscaping associated with the project as the applicant recognizes those trees are not a part of the project. Further as discussed on page 4.2-15, of Chapter 4.2, Aesthetics, in the Draft EIR, for a conservative analysis, the lighting calculations do not take into account any existing or future obstructions such as trees, fencing, or the spectator stands surrounding the field, which could reduce light spill. However, the existing on-site features do not provide significant or consistent shielding for off-site glare or light spill.

SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
RESPONSE TO COMMENTS

- 6-16 This comment requests a detailed landscaping plan be made available in the Draft EIR. This comment has been previously discussed. See Responses to Comments 6-13 and -14.
- 6-17 This comment provides a discussion of some fundamental concepts of acoustics, but does not express a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 6-18 This comment provides a discussion of sleep and speech interference but does not express a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 6-19 This comment expresses an opinion regarding speech and sleep disruption during Piner High School and Police Athletic League football games, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. Sleep disruption is described beginning on page 4.4-6 in Chapter 4-4, Noise, in the Draft EIR. Further, as noted on page 4.4-16 a discussion of single event noise is provided to address potential annoyance due to sleep disruption and as stated on page 4.4-18 since projected L_{max} levels are in excess of 65 dBA, there would be a potential for sleep disruption during evening games. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 6-20 This comment expresses an opinion regarding the use of starter pistols and suggests mitigation, but does not state a specific concern or

question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

6-21 This comment expresses an opinion regarding the use of sound generating devices such as air horns and suggests mitigation, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

6-22 This comment expresses an opinion noise generated by the existing football games played at Piner High School by the Police Athletic League (PAL) on Sundays between August and October, and suggests mitigation. The PAL football games would continue to be held at the project site and were included in the Draft EIR as illustrated in Chapter 3, Project Description, of the Draft EIR, in Table 3-1, Jim Underhill Stadium Existing and Proposed Annual Events on page 3-19. Accordingly, the noise impacts associated with the PAL football games were analyzed in the Draft EIR. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

6-23 This comment expresses an opinion regarding the use of the Public Address system and requests the associated speakers not be pointed towards the homes on the east side of the project site. As noted in Chapter 3, Project Description, of the Draft EIR, on page 3-14, the existing portable sound system would be replaced with a new fixed system. The new PA system would include several loudspeakers that

would be strategically placed around the field, near the stands, so that the PA system would provide adequate coverage while allowing for lower noise levels at each speaker. The speakers would be very directional to allow for more precise focusing of sound energy into the stands. In addition, the PA system would incorporate an electronic limiter to control maximum noise levels.

Further, as described in Chapter 4.4, Noise, of the Draft EIR, on page 4.4-21, Mitigation Measure Noise-1 requires the applicant shall retain an acoustical consultant with experience in the design of outdoor sound system's to evaluate the sound system design and determine optimal location/orientation of speakers, speaker type, and maximum sound level limits. The acoustical consultant shall consider an initial design goal of 70 dBA for the maximum noise level limit at adjacent residences. If this goal cannot be reasonably met due to the proximity of the residences, the consultant shall prepare a narrative describing the measures that were taken in the attempt to meet the goal, and the maximum levels that can reasonably be expected. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

- 6-24 This comment speculates that the sound associated with the proposed Public Address system would increase as the size of the crowd increases and requests that additional analysis be included in the EIR for crowd sizes of 500, 1,000, and 1,500. As described in Chapter 4.4, Noise, of the Draft EIR under the subheading 2. Operational Impacts” starting on page 4.4-15, to account for the possibility of increased crowds at future evening games, an adjustment was made to the measured noise levels taken at the September 18, 2010 varsity football game at Piner High School, where approximately 234 people were in attendance, versus up to 1,672 that could attend games in the

future, based on the projected increase in the number of future spectators. Specifically, the noise level measured during the varsity game was adjusted upward by 3 dBA for each doubling in the number of spectators. An adjustment upward was also made to account for increased noise from an ‘exciting’ game. This adjustment ranged from 1 to 3 dBA depending on location of the residence.

The analysis of daily Community Noise Equivalent Level (CNEL) presented in the Draft EIR is somewhat conservative since it only considers the noise level increase on a day when there is a well attended and exciting varsity football game or other heavily attended event. Other activities at the field would likely generate lower levels and these include men’s and women’s soccer games and practices, cross country meets and practices, and graduation.

6-25 This comment expresses an opinion regarding the installation of a sound wall, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

6-26 This comment requests that the Santa Rosa School District’s Board of Directors direct Piner High School to use Chapter 17-16 of the Santa Rosa Municipal Code (Municipal Code), specifically Sections 16.010, 16.030, 16.040, 16.090, 16.160, and 16.170. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. Per Government Code 53091 and 53094, this project is exempt from local building codes, General Plan designations, and zoning ordinances. The District is a separate public agency subject to its own rules and regulations. However, City of Santa Rosa noise requirements were included in the Draft EIR for informational purposes and the Draft EIR considers the noise limits in the noise ordinance

SANTA ROSA CITY SCHOOLS
PINER HIGH SCHOOL FIELD LIGHTING PROJECT
FINAL EIR
RESPONSE TO COMMENTS

when setting design goals for the sound system (see page 4.4-21 of the Draft EIR). The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

- 6-27 This comment presents a recommendation that was made to the Santa Rosa City Schools District and the Santa Rosa America Little League regarding the monitoring of noise levels, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 6-28 This comment presents the Piner High School Alleviation Responsibilities as suggested by Piner Neighborhood Preservation Group, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 6-29 This comment contains general information on the commentor themselves and contains closing language for this comment letter. No response is required.

COMMENT LETTER #7

RECEIVED
MAR 09 2011
BUSINESS OFFICE
SANTA ROSA CITY SCHOOLS

Response to request for inputs on Environmental Impact of Piner High School Lights Proposal:

The proposed lighting system would place fifty 70 foot high poles directly west of my home at a nearest distance of approximately 100 feet. The poles would be located even closer to my neighbor's homes. Light fixtures with 1500 Watts of lighting would top these poles, the 15 nearest of which would essentially fill the sky from 20 to 35 degrees above the horizon from my location and over 50 degrees elevation from my neighbor to the west. Directly to the west one of four taller Field Light poles would stand at 80 feet and support 11 lights at 1500 Watts each. This would be visible at 35 to 50 degrees (arctangent of 70/100 or 70/55) above the horizon, directly from my front yard and from those of at least 44 or more of my neighbors (counted as those homes within 3 lots from the edges of the Piner High School field). In daylight and in later hours when the lighting was not turned on, these structures would significantly obstruct the horizon below the same 35 to 50 degree elevation (essentially creating a framework of a 7 story high building immediately adjacent to a suburban area).

7-1

On those same poles, we will expect an amplified loud speaker to deliver sound to the spectators of the football field. Currently the sound from small portable sound systems used by non-student football teams on weekends often exceed the daytime limits of 60 dBA (considered "normally acceptable") by 10 or more dB. Would we expect the combined sound of the new system to deliver less sound pressure? Why else would Piner High School Field install the system if not to deliver a louder sound? Note that the 60 dBA limit applies for daytime sound, and the proposed lighting system would operate to at least 10 PM, where typical limits are reduced by 10 dB.

7-2

This installation would obviously violate the Light Trespass limits set by the State of California which require any light fixture with over 175 Watts to be shielded to stop any illumination past the property line. Tens of thousands of Watts would easily exceed the limits of illumination (1800 lumens) set to prevent Light Pollution and Light Trespass.

7-3

Not only would this plan result in Light Trespass, it would interfere with the Quiet Enjoyment of the Property of more than those 44 homeowners or residents immediately adjacent to the field. The structures themselves would essentially mimic the construction of a 7 story building immediately to the west of the entire building. This structure would block the view of the sky during both day and night, interfering with the enjoyment of our view which we have had for many decades as neighbors of Piner High School. Our quiet enjoyment of the sunset and night sky would be stolen by this development, even without lighting being turned on. My personal use of my telescope and binoculars for astronomy would be greatly restricted, as would my personal enjoyment of the sky and sunset by the invasion of these gigantic structures. None of the neighbors could take photographs of the sunset or even see it past this huge array of light fixtures, whether or not the lights were turned on or were dark.

7-4

The proposed mitigation of the Light Trespass problem by planting trees to shield the light would even further increase the interference of our Quiet Enjoyment of our Property. The 7 to 8 story building footprint would become solid, not just a framework of a building. The plants in the yards of the neighborhood would no longer have sun after the early afternoon. The evening temperatures would be

7-5

1002

significantly cooler for those yards immediately to the west of the field, further interfering with the ability of the residents to enjoy their own back yards.

7-5
cont.

When the City of Santa Rosa has to go through an entire rezoning process to allow a resident of this same neighborhood to increase their fence height to 6 feet, how can the school board increase the Piner High School fence height to over ten times that height without consequences?

7-6

An estimate of the value of the homes of the 44 immediate neighboring properties taken from Zillow suggests a median value of approximately \$350,000 for each. The total of those 44 properties (as displayed on the www.zillow.com website) totals \$14.97 million dollars, down from nearly twice that several years ago. The property loss from the consequences of the project are more severe in the housing downturn, because so many properties are available for sale compared to the earlier situation. Who would desire to purchase a home encumbered with Light Trespass and Noise Pollution during most of the evening hours? Who would purchase a home situated immediately adjacent to a 7 story building, even if only framed and not solid? This suggests that the sale of properties in the neighborhood would not be possible without significant reduction in their asking price, which fact was confirmed to me by both real estate agents and an appraiser.

Estimates of the reduction in value which result from the proposed lighting plan suggest a 25 to 30 % reduction in value of the property value for these 44 homes previously mentioned and for many others slightly further away in the immediate neighborhood of Piner High School back field. This represents \$3.7 to \$4.5 million dollars in lost value to the homeowners in the immediate neighborhood, with much more at risk from the development of this project.

One could easily conclude that this development poses a risk that the school district cannot afford to take, even in the face of the opportunity to sell time on the field to other organizations beyond Piner High School. Any revenue from such sales would be an extremely small amount in the face of the risk of a lawsuit by the neighbors to recover the loss in their property values. Not a few lawyers are willing to take such a suit in exchange for some of the proceeds, so this poses a serious risk for both the school district and for the school district board members themselves. Their actions to approve the lighting plan would appear to leave them directly responsible for the loss of property values of the neighborhood.

7-7

I strongly object to this lighting plan. I strongly recommend that the school district consider alternative means to accomplish the goals that this plan presents. When absolutely required, portable lighting might well substitute for any of the needs of the Piner High School functions. The risk of lost school revenue is too high for the school board to take upon themselves and is unacceptable to me and my fellow residents of the entire school district, since we are the ones who pay the taxes that would have to fund the results of any lawsuit.

It would only take a few disgruntled neighbors who lost significant portions of the value of their homes to convince many more to join a lawsuit, once they experience the effects of this installation. I strongly urge you to consider this risk as real. It will happen, regardless of what the members of the school board believe, and they may well see lawsuits targeting them personally for their part in the loss of that property value.



GRANT MOULTON
2348 MARSH CT
SANTA ROSA, CA 95403

2012

LETTER 7: Grant Moulton. March 9, 2011.

- 7-1 This comment expresses an opinion regarding the placement of the proposed project's 70-foot lighting standards, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. As noted in Chapter 4.1, Impact Found To Be Less Than Significant, beginning on page 4.1-1, the addition of two 80-foot poles and two 70-foot poles to the existing football field, and pedestrian pathway lights, additional visitor bleacher seating, and an amplified public address system (PA system) would not degrade the overall daytime visual character of the area as these poles would be generally consistent with the overall mix of the school/campus/park and other developed land uses in the project area, albeit taller. While the proposed project's lighting standards would be visible from adjacent neighbors and roadways, it will not significantly impact public views. Public views are those which can be seen from vantage points that are publicly accessible, such as those from streets, public sidewalks/trails, parks, and vista points. These views are generally available to a greater number of persons than are private views. Private views are those which can be seen from vantage points located on private property. Private views are not considered to be impacted when interrupted by land uses on adjacent blocks. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 7-2 This comment expresses concern that the new sound system will be louder than the existing portable sound system and "exceed the daytime limit of 60 dBA (considered "normally acceptable") but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The 60 dBA level mentioned in the comment is not a daytime limit but rather a land use compatibility threshold based on the Ldn, a 24 hour average noise level (see Table 4.4-1 on page 4.4-3 of the Draft EIR). Regardless, the new sound system will have multiple loudspeakers

and other features to minimize transfer of sound to the community (see Response to Comment 6-23). The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

- 7-3 This comment states the project would exceed the standards of light pollution but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. As noted on page 4.2-22 in Chapter 4.2, Aesthetics, of the Draft EIR, the project would result in significant and unavoidable light and glare impacts.
- 7-4 This comment expresses an opinion regarding the proposed project's interference with quiet enjoyment and blocked views of the night sky, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. As illustrated on page 3-17 in Chapter 3, Project Description, on Table 3-1, Jim Underhill Stadium Existing and Proposed Annual Events, with the addition of the lights, there would be a maximum of 35 nighttime events using both the lighting and improved PA systems with an anticipated range of attendance of 100 to 1,672 spectators at the field. All lights would be pointed downward toward the project site so as to minimize glare and light trespass as shown on Figure 3.6, Light Pole Schematic 14 Fixtures and Figure 3.7, Individual Fixture Assembly, on pages 3-12 and 3-13, respectively. The Draft EIR is not meant to address personal well being, economic or financial issues, or the market demand for the project. Rather, the purpose of CEQA and the Draft EIR is to fully analyze and mitigate the project's potentially significant physical impacts on the environment. See Responses to Comments 3-1, 7-1, and 7-3.
- 7-5 This comment expresses an opinion regarding the impacts associated with planting trees as required by Mitigation Measure LG-1 discussed on page 4.2-19 in Chapter 4.2, Aesthetics, of the Draft EIR. See Responses to Comments 6-13 through -16.

- 7-6 This comment expresses a concern regarding the installation of an 8- to 10-foot-tall noise barrier wall discussed on page 4.4-8 in Chapter 4.4, Noise of the Draft EIR. The noise barrier would need to be constructed along the east and north property lines wall in order to reduce project noise increases to less than 5 dBA (CNEL) at the nearby residential dwellings. The height of the barrier would be measured relative to the backyard elevations of the homes, illustrated in Figure 4.4-2, Location and Height of Proposed Noise Barrier, shows the location of the noise barrier. If it were determined the noise barrier was a viable option, the development would be required to comply with all applicable, local, State, and federal laws.
- 7-7 This comment addresses the economics of the project, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. As previously discussed, the Draft EIR is not meant to address personal well being, economic or financial issues, or the market demand for the project. Rather, the purpose of CEQA and the Draft EIR is to fully analyze and mitigate the project's potentially significant physical impacts on the environment. See Response to Comment 3-1. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

COMMENT LETTER #8

RECEIVED

MAR 09 2011

BUSINESS OFFICE
SANTA ROSA CITY SCHOOLS

Diane Madrigal
1827 Cody Court
Santa Rosa Ca, 95403

I am completely against the new project at Piner school. The noise level is already over the top. My children and I suffer from PTSD. The noise and constant sounds coming form the school on Saturdays , Sundays and other meeting dates is intrusive.

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8-1

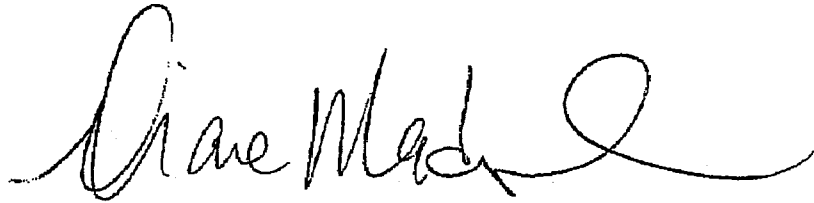
Further , the electricity and light emitting from your proposed installations are hazardous to our health and well -being and environment.

|
8-2

I am requesting that you not do this.

The only remedy would be to buy my house and we will move .
Otherwise as long as I live there, this will be a burden to our family on our health and well being that I will hold the school system responsible for.

|
8-3



3/9/11

LETTER 8 Diane Madrigal. March 9, 2011.

- 8-1 This comment contains general information on the commentor herself and expresses an opinion about the merits of the project and the existing noise level, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The commentor is directed to review the analysis of noise impacts of Chapter 4-4, Noise, in the Draft EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 8-2 This comment speculates that the proposed installations are hazardous to health, well-being, and environment, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The commentor is directed to Chapter 4, Impacts Found To Be Less Than Significant, of the Draft EIR, suheading "Hazards and Hazardous Materials." See Response to Comment 3-1. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.
- 8-3 This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. This comment contains closing language for this comment letter. No response is required. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project.

6 MITIGATION MONITORING REPORT PROGRAM

The optional Chapter 6 contains the Mitigation Monitoring Report Program (MMRP). Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a “reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment” (Mitigation Monitoring Reporting Program, Section 15097 of the State CEQA Guidelines provides additional direction on mitigation monitoring or reporting). The Santa Rosa City Schools District (District) is the Lead Agency for the proposed Piner High School Field Lighting Project and is therefore responsible for enforcing and monitoring the mitigation measures in this MMRP.

A Draft EIR has been prepared to address the potential environmental impacts of the project. Where appropriate, this environmental document identified project design features or recommended mitigation measures to avoid or to mitigate potential impacts identified to a level where no significant impact on the environment would occur. There are occasions that feasible mitigation is not available. CEQA Code 15126.4 (5) states: If the lead agency determines that a mitigation measure cannot be legally imposed, the measure need not be proposed or analyzed. Instead, the EIR may simply reference that fact and briefly explain the reasons underlying the lead agency's determination. This MMRP is designed to monitor implementation of the required and recommended mitigation measures and conditions set forth for project approval for the project as identified in the Draft EIR and the Final Environmental Impact Report (Final EIR). The required and recommended mitigation measures as well as the conditions set forth for project approval are listed and categorized by impact area, with an accompanying identification of the following:

- ◆ Monitoring Phase, the phase of the project during which the mitigation measure shall be monitored. These phases include:
 - Pre-Construction, including the design phase
 - Construction
 - Operation (post-construction)
- ◆ Implementing Party, the party responsible for implementing the mitigation measure.

- ◆ The Enforcement Agency, the agency with the power to enforce the mitigation measure.
- ◆ The Monitoring Agency, the agency to which reports involving feasibility, compliance, implementation, and development are made.

The MMRP for the project will be in place throughout all phases of the project. The Project Applicant shall be responsible for implementing all mitigation measures unless otherwise noted. The Project Applicant shall also be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented. The District will be used as the basic foundation for the MMRP procedures and will also serve to provide the documentation for the reporting program.

Generally, each certification report will be submitted to the District in a timely manner following completion/implementation of the applicable mitigation measure and shall include sufficient information to reasonably determine whether the intent of the measure has been satisfied. The District shall assure that project construction occurs in accordance with the MMRP. Departments listed below are all departments of the District unless otherwise noted.

A. Aesthetics: Light and Glare (LG) Impacts

Mitigation Measure LG-1: In addition to the existing trees planted along the northern and eastern sides surrounding the project site, the applicant shall consult with residents adjacent to the project site in conjunction with consultation with a landscaping expert prior to the installation and operation of the lighting assemblies to determine the appropriate supplementary trees (i.e. non-deciduous trees) that would be necessary to screen and reduce the introduced light and glare impacts on the northern, eastern, and southern project perimeter. Appropriate supplementary trees and landscaping shall consider the tree species, number of trees, and timing for plantings (i.e. time of day and

SANTA ROSA CITY SCHOOLS
 PINER HIGH SCHOOL FIELD LIGHTING PROJECT
 FINAL EIR
 MITIGATION MONITORING REPORT PROGRAM

year) as the addition of new non-deciduous trees could result in temporary shadows in the immediate project vicinity as the trees mature. Once the appropriate additional trees have been determined (i.e. tree species, number of trees, timing for plantings, shading considerations, etc.) the trees shall be planted according to the appropriate season as determined by the selected landscaping expert, which may be prior to the installation of the lighting assemblies or immediately following. The landscaping type, design and timing shall be established prior to the installation of the field lights. The supplementary trees and landscaping shall be maintained in perpetuity by the applicant.

Monitoring Phase	Pre-Construction and Operational/Ongoing
Implementing Party	Applicant
Enforcement Agency	Maintenance and Operations Division
Monitoring Agency	Maintenance and Operations Division

Mitigation Measure LG-2: The applicant shall consult with residents adjacent to the project site prior to the installation and operation of the lighting assemblies to coordinate the appropriate type of fencing and install a fence along the northern and eastern perimeter of the project site. The fence type, design, and timing shall be established prior to the installation of the field lights.

Monitoring Phase	Pre-Construction
Implementing Party	Applicant
Enforcement Agency	Maintenance and Operations Division
Monitoring Agency	Maintenance and Operations Division

Mitigation Measure LG-3: The applicant shall install Musco brand lights or any other brand that demonstrates comparable or better light performance and shielding of surrounding properties.

Monitoring Phase	Construction
Implementing Party	Applicant

Enforcement Agency	Maintenance and Operations Division
Monitoring Agency	Maintenance and Operations Division

B. Noise

Mitigation Measure Operational Noise-1: The applicant shall retain an acoustical consultant with experience in the design of outdoor sound system's to evaluate the sound system design and determine optimal location/orientation of speakers, speaker type, and maximum sound level limits. The acoustical consultant shall consider an initial design goal of 70 dBA for the maximum noise level limit at adjacent residences. If this goal cannot be reasonably met due to the proximity of the residences, the consultant shall prepare a narrative describing the measures that were taken in the attempt to meet the goal, and the maximum levels that can reasonably be expected.

Monitoring Phase	Pre-Construction
Implementing Party	Applicant
Enforcement Agency	Maintenance and Operations Division
Monitoring Agency	Maintenance and Operations Division