



March 22, 2017

VIA HAND DELIVERED

Ms. Ara Zareczny, Facilities Analyst, LEED/AP  
Newport-Mesa Unified School District  
Education Center  
2985 Bear Street, Building A  
Costa Mesa, California 92626

Re: Eastbluff Homeowners Community Association's Public Comment on the Draft Environmental Impact Report for the Proposed Corona del Mar Middle and High School Sports Field Project

Dear Ms. Zareczny:

The purpose of this letter is to submit the public comments of the Eastbluff Homeowners Community Association ("Eastbluff Association") regarding the Draft Environmental Impact Report ("Draft EIR") prepared for the Newport-Mesa Unified School District ("NMUSD" or "District") concerning its proposed sports field project ("Proposed Project") on the Corona del Mar Middle and High School campus ("CdM campus").

The Eastbluff Association contains and represents 460 single-family homes located in close proximity to the CdM campus. The information we are providing in this public comment letter represents the overwhelming opinion of our members and is documented by numerous community meetings, discussions by the Eastbluff Association's Board of Directors ("Board") concerning the Proposed Project, research and outreach by that Board's appointed subcommittee concerning the Proposed Project, a homeowner survey concerning the Proposed Project, and the Eastbluff Association's comments on the Recirculated Initial Study (included as Attachment A). The Board was assisted in drafting this public comment letter by its retained land use and environmental attorney and several retained environmental consultants, including a California Environmental Quality Act ("CEQA") consultant.

The Eastbluff Association wishes to make it clear from the outset that we are not opposed to the Track and Field Replacement at the CdM campus to improve student-athletic safety. Rather, our homeowners are mobilized and active in expressing their deep concerns over, in primary part, the lighting and public address system for the Proposed Project. Therefore, the Eastbluff Association strenuously opposes the field lighting and public address system components of the Proposed Project as they will each cause significant negative environmental impacts on our community. The Draft EIR properly acknowledges such with respect to noise and should do the same with respect to lighting in the Final EIR.

It is without question that our community will be severely and negatively impacted by the construction of one or more lighted athletic fields at the CdM campus. Our community is built on a hill. A significant portion of that hill overlooks the CdM campus and, therefore, the location of the Proposed Project. The homes in our community nearest to the high school are less than 150 feet from the Proposed Project. Starting



there, our community rises up on our hill all the way to Jamboree Road. The top of our community is approximately 100 feet higher in elevation than the Proposed Project's site.

Should the Proposed Project be built, all of the nearby residential communities will suffer significant environmental impacts. However, the unique position of our community relative to the Proposed Project site and our community's unique topographic characteristics will cause us to suffer multiple, diverse, and extensively significant negative environmental impacts which will be of types, magnitude, and intensity greater than any of the other nearby residential and commercial developments.

Our community was designed to take full advantage of views from our homes. Many of those views are directly across the Proposed Project site. These views include the City of Newport Beach, Newport Harbor, Back Bay, the horizon towards the Pacific Ocean, Catalina Island, the Costa Mesa/Huntington Beach vista, Palos Verdes, and mountains to the north and west.

In addition to views, the configuration of the hill upon which our homes are built, combined with the differences in elevation from the lower homes to the higher homes, creates a bowl. This bowl surrounds the CdM campus, which encompasses the Proposed Project site. Noise from the CdM campus currently radiates up our residential streets nearest the school to homes at the top of the hill. A noise tunnel effect sends school noise from events, especially in the early morning and evening, far up into our community. The District and the City of Newport Beach recognized the existence of this effect when they constructed the existing sound wall for the joint-use Marion Bergeson swimming pool. The proposed lighted stadium and the alternatively proposed lighted athletic field(s) uses will result in significantly more noise than the current field and track use, will introduce permanent and regular night use to the track and field and/or similar athletic fields for the first time in the school's 50-year history, and will negatively impact the existing environment of our community.

Since the construction of the CdM campus and the surrounding homes in the 1960s, the residential areas nearby have remained essentially the same. What has changed drastically is the CdM campus. Residential growth elsewhere in the City of Newport Beach, the District's decision to open a middle school on the CdM campus, the small campus, and a single street providing the only direct access to the school have inexorably led to the following:

- Overcrowding of the school;
- Too many cars trying to access the school;
- Not enough on-site school parking;
- Students parking off-site;
- Students running across streets to and from school in heavy traffic;
- Traffic jams on the surrounding streets which were designed for much smaller traffic loads; and
- Excessive daytime and nighttime noise.

Our Eastbluff community has a very diverse population. Our homeowners range from families with young children who are new to the Eastbluff Association to long-term residents who have lived in their homes for more than 40 years. Many homes are occupied by second generation family members. We love our neighborhood and its peace and quiet, especially in the evening. The installation of one or more sports fields with lights and a public address system on the CdM campus threatens us with the disruption of our existing

living environment and will significantly impact the quality of life our community has experienced for the past 50 years.

For the Eastbluff Association, the lighting and public address components of the new sports field are patently incompatible with the immediate residential surroundings. This letter outlines why that is the case, enumerates myriad deficiencies in the Draft EIR contrary to CEQA's mandatory requirements, and supports an alternative to the Proposed Project which would minimize the significant negative environmental impacts on our community while satisfactorily fulfilling the District's desire to upgrade the CdM Campus' athletic fields. Following in this letter are general comments and comments on the Draft EIR.

## **GENERAL COMMENTS**

### **GOOD NEIGHBOR APPROACH**

The Eastbluff Association commends the District on their 2016 revision to BP 1330(a)/Use of School Facilities Under the Civic Center Act, which provides much greater certainty to the District, the City of Newport Beach, and the community about who, what, and when various sports fields or facilities will be used.

We would urge the District to further revise BP 1330(a)/Use of School Facilities Under the Civic Center Act to include Good Neighbor Policies with respect to the Proposed Project or any approved alternative to the Proposed Project. Suggested introductory wording and a new policy are provided below:

#### **Introductory Wording**

"Good Neighbor" Policy

The Newport Mesa Unified School District Board of Education recognizes the need for our schools to establish a "Good Neighbor" policy consistent with the specific neighborhoods in which the schools are located. The Superintendent or designee shall review the "Good Neighbor" policy for consistency, practicality, and applicability to each school site. The school sites are to be inclusive (students, parents, site council members, youth and community organization users, and neighborhood representatives) in the development of their "Good Neighbor" policy. Recommendations to consider for guidelines are:

- 1: The number of night-time activities beyond 6:00 PM.
- 2: The beginning and ending times for all weekend activities.
- 3: The number of weekend activities.
- 4: The use of public address and lighting systems for outdoor facilities.
- 5: The number of supervisory staff in relation to the number of participants.
- 6: The inclusion of an annual review, discussion, and possible modification of the individual schools' "Good Neighbor" policy.

#### **New Policy**

To comply with the California Environmental Quality Act Final Environmental Impact Reports for Corona Del Mar Middle and High School, Costa Mesa High School, Estancia High School, and Newport Harbor High School, there are certain limitation on the use of field lights and public address system. The District will continue to follow the limitations set forth in the Final Environmental Impact Report and/or practices per BP 1330(a)/Use of School Facilities Under the Civic Center Act for these school sites, applying the more stringent standard.

## **COMMENTS ON DRAFT EIR**

### **REVISE DRAFT EIR TO REFLECT CURRENT BOARD DIRECTION OR POLICY**

During preparation of the Draft EIR or following release of the Draft EIR, the Board of Education has:

1. Adopted Resolution No. 28-02-17, Corona Del Mar Middle and High School Sports Field Project, on February 27, 2017. The Board of Education supports the preference of the school and the community to limit the seating capacity of the bleachers for the replacement and reconfiguration of the existing sports track and field to no more than the current seating capacity of 664 seats.

Due to this reduction of seats from 1,000 to 664 seats, the Proposed Project has been modified to reflect the elimination of visitor seating and greenscreen on the south side of the field adjacent to Vista del Oro, and the elimination of the ticket booths, concession stand, restrooms, and press box, on the east side of the field.

The Eastbluff Association supports the elimination of the aforementioned project components, as they result in less activity and noise to the surrounding residences, and requests assurances that these project components will not be built in the future without notification to the Eastbluff Association and proper CEQA review.

2. Adopted revisions to the Facilities Use Policy BP1330(a), Use of School Facilities, and revised Rule and Regulation for Use of School Facilities Under the Civic Center Act, on August 23, 2016. The revisions primarily pertained to the Use of Outdoor Facilities and identified use and time parameters for Artificial Turf Fields, Natural Fields, Pools, and Tennis Courts; refer to tables on the following pages.

At Board of Education and/or community meetings, District staff has confirmed:

1. The proposed Sports Field Project does not support Varsity Football games, but does support Varsity Football practice. Varsity Football would continue to play home games at Newport Harbor High School's Davidson Field, Estancia High School's Jim Scott Stadium, and Orange Coast College's LeBard Stadium.

The Draft EIR Project Description and all applicable environmental analysis and EIR sections require revisions to reflect the above-referenced Board direction or policy and field use confirmation.

#### USE OF ARTIFICIAL TURF FIELDS

MONDAY - THURSDAY	FRIDAY	SATURDAY	SUNDAY
School in Session: 7 am - 8 pm (Practice)	School in Session: 7 am - 8 pm (Practice) 7 am - 10 pm (Games)	9 am - 8 pm (Practice) 9 am - 10 pm (Games)	10 am - Dusk
School not in Session: 8 am - 8 pm (Practice)	School not in Session: 8 am - 8 pm (Practice) 8 am - 10 pm (Games)		
*Use of Lights: Practice - until 8 pm	Use of Lights: Practice - until 8 pm Games - until 10 pm	Use of Lights: Practice - until 8 pm Games - until 10 pm	NO USE OF LIGHTS

##### PLEASE NOTE:

No private outside use—only public agencies are allowed to use artificial turf fields within the approved times if they are available. After practice the lights would be on at approximately 40% of full level for fifteen minutes for cleanup. After games the lights would be at approximately 40% of full level for one hour for clean-up, except for clean-up for Homecoming, Battle of the Bell, and Battle of the Bay.

Public Address systems are only to be used for games and special events, such as opening day for sports teams, track meets, or graduations. Public Address systems will be turned off after the final announcement asking everyone to leave the facility.

The Superintendent or his designee(s) may allow occasional use outside these hours. Requests must be made at least 60 days in advance.

#### USE OF NATURAL TURF FIELDS

MONDAY - THURSDAY	FRIDAY	SATURDAY	SUNDAY
<b>NOT LIGHTED</b> School in Session: 7 am - Dusk or 8 pm (Whichever is earliest)	<b>NOT LIGHTED</b> School in Session: 7 am - Dusk or 8 pm (Whichever is earliest)	<b>NOT LIGHTED</b> 9 am - Dusk or 8 pm (Whichever is earliest)	<b>NOT LIGHTED</b> 10 am - Dusk
School not in Session: 8 am - Dusk or 8 pm (Whichever is earliest)	School not in Session: 8 am - Dusk or 8 pm (Whichever is earliest)		
<b>WITH LIGHTS</b> School in Session: 7 am - 8 pm	<b>WITH LIGHTS</b> School in Session: 7 am - 8 pm	<b>WITH LIGHTS</b> 9 am - 8:00 pm	NO USE OF LIGHTS
School not in Session: 8 am - 8 pm	School not in Session: 8 am - 8 pm		

##### PLEASE NOTE:

Public Address systems may only be used for special events such as opening day for sports teams or graduation and Flag Deck on school days.

The Superintendent or his designee(s) may allow occasional use outside these hours. Requests must be made at least 60 days in advance.

#### USE OF TENNIS COURTS

MONDAY - THURSDAY	FRIDAY	SATURDAY	SUNDAY
8 am - 8 pm	8 am - 8 pm	8 am - 8 pm	10 am to Dusk (No Use of Lights on Sundays)

##### PLEASE NOTE:

Lights may be used as necessary to light courts during approved use.

#### USE OF POOLS

MONDAY - THURSDAY	FRIDAY	SATURDAY	SUNDAY
5:30 am - 9 pm	5:30 am - 9 pm	5:30 am - 9 pm	10:00 am - 8 pm**

##### PLEASE NOTE:

Lights may be used as necessary during the year to accommodate the use from 5:30am-9:00pm. Lights will be dimmed to approximately 40% of full level for fifteen minutes at the end of use, for cleanup.

No use of whistles at pools before 7:00 am.

Public address systems may only be used for games and meets.

The Superintendent or his designee(s) may allow occasional use outside these hours. Requests must be made at least 60 days in advance.

\*\*Existing Users can use pools on Sundays until 9 pm through October 23, 2016.

The notes from the previous tables are summarized below. Highlighting is shown for emphasis.

Artificial Turf Fields	Natural Turf Fields	Pools	Tennis Courts
<p>No private outside use--only public agencies are allowed to use artificial turf fields within the approved times if they are available. After practice the lights would be on at approximately 40% of full level for fifteen minutes for cleanup. After games the lights would be at approximately 40% of full level for one hour for clean-up, except for clean-up for Homecoming, Battle of the Bell, and Battle of the Bay.</p> <p>Public Address systems are only to be used for games and special events, such as opening day for sports teams, track meets, or graduations. Public Address systems will be turned off after the final announcement asking everyone to leave the facility.</p> <p>The Superintendent may allow occasional use outside these hours. Requests must be made at least 60 days in advance.</p>	<p>Public Address systems may only be used for special events such as opening day for sports teams or graduation and Flag Deck on school days.</p> <p>The Superintendent may allow occasional use outside these hours. Requests must be made at least 60 days in advance.</p>	<p>Lights may be used as necessary during the year to accommodate the use from 5:30 am-9:00 pm. Lights will be dimmed to approximately 40% of full level for fifteen minutes at the end of use, for cleanup.</p> <p>No use of whistles at pools before 7:00 am.</p> <p>Public address systems may only be used for games and meets.</p>	<p>Lights may be used as necessary to light courts during approved use.</p>

## **SUPPORT FOR COMMUNITY PLAN ALTERNATIVE 1 IN DRAFT EIR**

The Eastbluff Association supports Draft EIR Community Plan Alternative 1: Two Fields with Reduced Capacity and No Lights. Under this Alternative, there would be a bleacher seat capacity of 664 seats and all seating would be provided on the south side of the main field. In addition, a partially localized public address system would be installed; however, there would be no lighting installed and no noise wall on the north side would be provided. Also, no nighttime practices or games would occur. We do not support any portable or permanent lighting on the two fields. Under Community Plan Alternative 1, impacts relative to field lighting and noise are significantly reduced to the Eastbluff Association.

Our support of Community Plan Alternative 1 in Draft EIR is conditioned upon the following:

1. **Location of New Track and Field.** The new track and field will be constructed in the same location as the existing track and field (as shown in Figure 3-3 and not moved to the west as shown in Figure 7-2); and
2. **Location of New Second Field.** The new second field will be constructed as far away from Vista Del Oro as possible and as far to the east as possible. The preferred southerly location of the second field is shown in Figure 7-1.

Please note that constructing the new track and field in the location of the existing track and field will allow the second field to be constructed further to the east, thereby preserving more practice area for the students. The location of the second field as shown in Figure 7-2 is not acceptable to the Eastbluff Association.

## **OPPOSED TO PROPOSED PROJECT AND OTHER ALTERNATIVES IN DRAFT EIR**

The Eastbluff Association does not support the Proposed Project, the Community Plan Alternative 2: Two Fields with Reduced Capacity and Portable Lights, or the Community Plan Alternative 3: Two Fields with Reduced Capacity and Permanent Lights. The Proposed Project and Community Plan Alternative 2 and Alternative 3 create significant negative field lighting and noise environmental impacts on the Eastbluff Association community.

## **SECTION 3 - PROJECT DESCRIPTION/SECTION 4 - ENVIRONMENTAL SETTING**

The need for athletics fields is intrinsically tied to the student population on the CdM campus, as well as the District's Pre-K - 12 Priorities 2016-2017 of Academics, Behavior, and Creativity & Innovation and the high school athletics mission stated below.

*"The mission of the Newport-Mesa Unified School District athletics is to enrich the mental, physical, emotional, spiritual, and social well-being of all student athletes by providing cooperative and competitive opportunities which foster the development of lifelong values of sportsmanship, commitment, integrity, teamwork, individual effort, and good citizenship."*

The proposed area for the sports field is not a stand-alone site, but six acres within the existing 37-acre CdM Middle and High School campus. It is important to provide a meaningful and easily understandable description of the existing CdM campus first and the proposed sports field site second within one EIR section.



To do this, we recommend a new subsection be added to Section 3, Section 3.2 Existing CdM Campus, and that the following text paragraphs be removed from Section 4.3.2 and added to Section 3.2:

“The 37-acre CdM campus is currently developed with high school classroom buildings, middle school enclave, administration, a gymnasium, a 350-seat performing arts center, three parking lots totaling 592 stalls, a high school student loading zone, a middle school student loading zone, a varsity baseball field, multipurpose athletic fields, eight tennis courts, hardcourts, swimming pool, outdoor lunch quad, pedestrian walkways, and landscaped planters (see Figure 3-3, Aerial Photograph). The existing sports field contains a score board, discus area, and long-jump area. A small storage hut and a storage box are at the northwest corner of the sports field. Thirty mature trees are planted along and near Vista Del Oro and Eastbluff Drive. There are no permanent bleachers on the sports field but 664-seat portable bleachers are available.

The total 2015–16 school year enrollment at CdM campus was 2,557 students—828 in the 7th and 8th grade middle school, and 1,729 in the 9th through 12th grade high school. Many of the 111 certified staff (i.e., teachers, administrators, and pupil services) were part-time employees, so the full-time-equivalent staff was 50 staff (CDE 2016). Additionally, there were approximately 20 volunteers.

### **Parking and Access**

Main vehicular access to the high school student loading zone, sports field, tennis courts, aquatic center, and sports parking lot is provided from Eastbluff Drive. Access to the faculty/visitor parking lot, middle school loading zone, and high school senior parking lot is provided via Mar Vista Drive. The CdM campus provides three parking lots totaling 592 spaces (573 regular spaces and 19 ADA spaces), as listed below:

- **Lot 1 (232 spaces).** A student/staff parking lot adjacent to Eastbluff Drive, accessed via two driveways on Eastbluff Drive.
- **Lot 2 (140 spaces).** A faculty/visitor parking lot at the northwest corner of Eastbluff Drive and Mar Vista Drive, accessed from Mar Vista Drive near Domingo Drive.
- **Lot 3 (220 spaces).** The west lot behind the middle school enclave, accessed from two driveways on Mar Vista Drive.

### **Existing Use and Schedule**

Competitive sporting events (e.g., football, soccer, lacrosse, and track and field) for CdM HS are played at Davidson Field at Newport Harbor High School in Newport Beach, Jim Scott Stadium at Estancia High School in Costa Mesa, and LeBard Stadium at Orange Coast College in Costa Mesa. Students currently travel to Estancia High School for football practices, boys' lacrosse practices, and girls' soccer practices and to Eastbluff Elementary School for girls' lacrosse practices. Only boys' soccer practices are being held at CdM campus.



### On-Campus Uses

The sports field is at the northeast corner of the CdM campus and is bordered by student parking, tennis courts, and a weight room building to the south and a turf multipurpose athletic field to the west.

Various authorized outside group use CdM campus facilities on weekdays and weekends throughout the year. Regularly occurring activities include: CalCoast Track Club uses the track and field, generally between 4 and 7 PM (average of 50 attendees); Volleyball Enterprises uses the gymnasiums, generally between 6:30 and 9:00 PM (50 to 250 attendees); and various groups use the swimming pool until 8 PM (average of 50 attendees). The baseball fields are also used for Little League on weekends and fall baseball academy from 3:30 to 5:30 PM. The existing turf field and synthetic track is also open to community uses, where residents are allowed outside of normal school hours for walking, running, and various recreational purposes without prior authorization from the District.”

In addition, the following must be added to the existing campus description:

- Complete description of existing Middle and High School buildings and uses
- School hours/schedule for the Middle and High Schools (early bell, late bell, etc.)
- Note that typical school activities are occurring between 6:30 AM and 3:30 PM
- Description and current schedule of Middle School and High School sports practices and meets/games (similar to Table 3-2, CdM MS/HS Sports Field Preliminary Event Schedule), including on-campus and off-campus locations
- Description of multiple/overlapping events on campus (i.e., schools, performing arts center, sports)
- Add a table that shows the hours for natural turf field, pools, and tennis courts (similar to Table 3-1, Use of Artificial Turf Fields)
- Describe if existing parking spaces provide sufficient parking for the campus faculty, students, and visitors
- Details on how existing parking lots are utilized
- Current campus parking operations, rules, restrictions, permits, and fees
- How parking is managed during events
- On-and off-site restrictions
  - Reserved/VIP Parking
  - Faculty and student parking/permits/assigned spaces
  - Residential permit parking on Aralia Street
  - Other CdM campus or City restrictions

The above-requested information will more accurately describe the daily schedule on the CdM campus, including an understanding that the school day for both the Middle and High Schools starts as early at 6:50 AM (early bell). The Draft EIR incompletely describes the CdM campus, which inhibits the reader from understanding the interconnectedness and intrinsic relationship between CdM campus and the smaller portion thereof on which the Proposed Project is proposed to be located.

## **Good Neighbor Policies**

Separately, a new section should be added to discuss the good neighbor policies the District intends to adopt and implement for the CdM campus. Such a section is necessary in order to properly analyze the proposed mitigation measures to decrease the Proposed Project's significant negative environmental impacts on the community, including the Eastbluff Association community.

## **SECTION 3 – PROJECT DESCRIPTION**

Additional clarification and assurances relative to the lighting system are needed. The first sentence on Draft EIR page 3-11 under the subheading Lighting System must be revised as follows to be consistent with other portions of the Draft EIR (e.g., “Glare” discussion on Page 5.1-39):

Nighttime lighting would be provided by four **fully shielded and full cutoff** 80-foot light poles, two on the back side of the home side bleachers and two on the back side of the visitor side bleachers.

## **SECTIONS 5.1 THROUGH 5.10 - CUMULATIVE IMPACT ANALYSIS**

CEQA Guidelines Section 15130(b) describes the parameters for conducting cumulative analysis.

*(b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact. The following elements are necessary to an adequate discussion of significant cumulative impacts:*

*(1) Either:*

*(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or*

*(B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.*

The Draft EIR used Method A, as stated on page 4-18, and provided a list of present or probable future projects. However, the cumulative projects list is silent about past projects in the immediate vicinity that are critical to the cumulative analysis, including Our Lady Queen of Angels Church and K-8 School and the remainder of the Corona Del Mar Middle and High School campus.

Contrary to CEQA's requirements, the Draft EIR fundamentally fails to analyze the cumulative impacts of the Proposed Project in conjunction with all the CdM campus' uses and the expanded list of cumulative projects with the Our Lady Queen of Angels Church and K-8 School and the remainder of the CdM campus. Thus, the cumulative analysis throughout Sections 5.1 through 5.10 must be revised. This additional analysis, absent which the Draft EIR fails to comply with CEQA, would constitute new information which requires recirculation of the Draft EIR per CEQA Guidelines 15088.5.

## **SECTION 5.1 - AESTHETICS**

### **General Comment**

#### Daytime and Nighttime Visual Simulations

The Draft EIR needs to be revised to provide more detailed text descriptions of both the existing and proposed foreground and background views. The current descriptions are too brief and do not provide adequate textual context to potentially support the analysis.

### **Change in Visual Character**

A project is considered to have a significant aesthetic impact if the project substantially changes the character of the project site such that it becomes visually incompatible or visually unexpected when viewed in the context of its surroundings. The installation of permanent lighting IS A SIGNIFICANT CHANGE over the existing conditions, by creating additional light pollution on and emanating from the CdM campus. The permanent lighting for the Proposed Project or alternatively proposed lit athletic fields 1) does change the character of the project site and 2) does make the Proposed Project and alternatively proposed lit athletic fields visually incompatible with respect to light and glare. These impacts are significant, especially when viewed in the context of the existing surrounding residential and institutional neighborhood, as required by CEQA. The proposed impact conclusion of less than significant is incorrect, incomplete, unsupported, and needs to be revised. This conclusion revision requires recirculation of the Draft EIR.

In addition, there is no analysis regarding the loss of mature trees on Vista Del Oro or Eastbluff Drive. The loss of these trees does substantially degrade the existing visual character of the site. The Draft EIR needs to be revised to address the removal of the trees and indicate if the trees would be replaced on-site. Mitigation should be developed to replace trees at a minimum 1:1 ratio. Identification of a new impact and/or new mitigation requires recirculation of the Draft EIR.

### **Proposed Sports Field Lighting**

The Eastbluff Association stated their concerns about the proposed lighting of the Proposed Project in its public comment letter on the Revised Initial Study, dated May 23, 2016. The concerns from pages A-5 and A-6 of this letter were:

*The Recirculated Initial Study indicates that measurements of "existing nighttime light levels" will occur at certain locations prior to the preparation of the Draft Environmental Impact Report. Only one location within the Eastbluff Association is proposed to be measured on Figure 13—this is referenced as "View 4." Additional locations with the Eastbluff Association must be measured. As*

*more specifically described in our cover letter and Exhibit "B" thereto, the Eastbluff Association uniquely overlooks the Proposed Project site. Given the change of elevation, topography, and orientation, the residences in the Eastbluff Association will be most affected by the Proposed Project's anticipated light and glare.*

*Views 1, 2, and 3 on Figure 13 are all at the same or a lower elevation compared to the Proposed Project and thus are meaningless to understand the foreseeable light and glare impact the Proposed Project will have on those who will be most affected (that being the Eastbluff Association).*

*The impact on the Eastbluff Association's residents cannot be sufficiently understood or analyzed using only one baseline nighttime light level reading location. As a result, the cumulative effect of light and glare if the Proposed Project were to be constructed and used cannot be adequately understood and analyzed based on the proposed level reading locations identified on Figure 13.*

*The Eastbluff Association requests that five additional nighttime light level reading locations be added within our community—specifically, we request that locations be added on Aralia Street, Aleppo Street, Alta Vista Drive, Alder Place, and Almond Place.*

*Absent the inclusion and consideration of additional nighttime light level locations within the Eastbluff Association in the Draft Environmental Impact Report, any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.*

The Proposed Project includes the addition of permanent lighting to the new artificial turf sports field, which would be permitted Monday through Saturday up to 8:00 PM for practices and up to 10:00 PM for games. These lighting time limits are consistent with the District's Rule and Regulation, Use of School Facilities Under the Civic Center Act, revised February 2017.

Presently, the CdM campus provides nighttime sports lighting for the swimming pool and tennis courts, and for the parking lots. Nighttime lighting for pools is permitted up to 9:00 PM Monday through Saturday, and 8:00 PM on Sunday. Nighttime lighting for the tennis courts is permitted up to 8:00 PM, Monday through Saturday only. These lighting time limits are consistent with the District's Rule and Regulation, Use of School Facilities Under the Civic Center Act.

The Proposed Project is located immediately north of the lighted tennis courts, which are immediately north of the lighted swimming pool. Thus, the Proposed Project increases and concentrates the combined amount of nighttime sports lighting allowed in the central and northeastern portions of the CdM campus. However, the cumulative effect of all the CdM campus nighttime sports lighting has not been modeled or sufficient cumulative light and glare impact analysis provided. Such modeling and analysis is mandated by CEQA. The proposed impact conclusion of less than significant is thus incorrect, incomplete, unsupported, and needs to be revised. This conclusion revision requires recirculation of the Draft EIR.

## **Visual Simulations and Associated Aesthetics and Light/Glare Analysis**

### General Comments

Draft EIR Figure 5.1-3 - Daytime Visual Simulation Location Map incorporates Recirculated Initial Study (RIS) Figure 13, which identified four View Simulation (Day and Night) Locations, including two locations within the Eastbluff Association – Location 3 from Aralia Street and Location 4 from what is not specifically specified in the Draft EIR but appears to be Alta Vista Street. The Draft EIR includes generic text on page 5.1-21, second paragraph, regarding Locations 3 and 4. The Draft EIR needs to identify the locations with the street name and any additional pertinent information about Locations 3 and 4.

The Community View legend on Draft EIR Figure 5.1-3 indicates View Simulation (Day and Night) Locations (4). This legend is inconsistent with Draft EIR Figure 5.1-16 - Nighttime Visual Simulation Location Map, which shows three locations which are not numbered, but called out as West View, North View, and Northeast View. This is problematic for several reasons: (1) There are not comparable nighttime views for any of the Community View Daytime Locations; and (2) The four daytime locations are equally important to represent nighttime impacts to residences located, west, north, and east of the sports field site.

### Daytime Visual Simulations

Figure 5.1-9, Visual Simulation from Residential Neighborhoods (View 3), and Figure 5.1-10, Visual Simulation from Residential Neighborhoods (View 4), show views from the second story of a residence located east of Eastbluff Drive. The Draft EIR needs to identify the street locations for Daytime View 3 and View 4 and add text to both the Figure and report text detailing the location.

### Nighttime Visual Simulations

With respect to the Nighttime Visual Simulations – all three were conducted from adjacent streets at eye level of a person standing on the sidewalk. While these simulations give a sense of what pedestrians or automobile drivers would see on the streets immediately adjacent to the sports field, they are not representative of what the Eastbluff residences would view, or what residences to the west or north would view.

We want to remind the District that as part of our comments on the RIS, we requested five additional nighttime light level reading locations be added to those shown in RIS Figure 13 for the Draft EIR analysis. We requested locations be added on Aralia Street, Aleppo Street, Alta Vista Drive, Alder Place, and Almond Place.

The requested locations were not included in the Draft EIR analysis. Thus, the Draft EIR has failed to analyze the nighttime lighting impacts to the Eastbluff homeowners or to show nighttime visual simulations from the five requested streets within our neighborhood, which reflect an increase in elevation from the sports field location. These locations are good representations of households that will look up, straight, or down at the sports field lights, and the significant lighting and glare impacts they will experience. Since nighttime lighting and glare impacts were identified as Areas of Controversy in the Draft EIR, the importance of these simulations were well known.

It is not possible to conclude that nighttime lighting and glare impacts would be less than significant to the surrounding community given the lack of representative locations that are reflective of the various residential neighborhoods and topography that surround the CdM campus. The Draft EIR needs to be revised to include daytime and nighttime visual simulations from the same locations, as well as to include daytime and nighttime visual simulations from locations on Aralia Street, Aleppo Street, Alta Vista Drive, Alder Place, and Almond Place, as the Eastbluff Association requested in May 2016.

The Proposed Project does not protect the current night sky views, but significantly degrades the views from adjacent residential areas. The introduction of permanent lighting for the Proposed Project or alternative lit athletic fields does create a new source of substantial light and glare that affects nighttime views for the surrounding residences. The permanent lighting for the Proposed Project or alternative lit athletic fields needs to be appropriately analyzed and addressed, particularly with respect to the impact on the Eastbluff community, as this neighborhood will adversely impacted by the Proposed Project's lighting or lighting of alternative athletic fields due to the proximity to the sports field and the topography of the Eastbluff homes being elevated above the sports field. The impact conclusion of less than significant is incorrect, incomplete, unsupported, and needs to be revised. This conclusion revision requires recirculation of the EIR.

#### Threshold and Analysis

Table 5.1-2, Average Maintained Illumination at Pavement by Pedestrian Area Classification, uses 0.8 foot-candle (fc) as the most conservative light levels for Local/Local streets. However, the levels cited in this table are intended for light levels at intersections and are incorrect for the analysis. Instead, the analysis should use the Illuminance Values for Walkways in Low Pedestrian Conflict Areas in a Medium Density Residential setting for Local/Local street, which is 0.4 fc.<sup>1</sup> This value is the minimum level to illuminate sidewalks, and is the factor also used for local streets midblock with low pedestrian conflict areas.

The analysis in the last full paragraph on Draft EIR page 5-31, which precedes Table 5.1-2, must be revised to reflect that 0.4 fc, not 0.8 fc, is the most conservative light level for local streets.

#### **Cumulative Lighting and Glare Impacts**

Cumulative lighting/glare modeling and analysis of the CdM campus with the Proposed Project and alternative lit athletic fields were not included in the Draft EIR. Additional modeling and analysis must be added to the EIR to reflect conditions showing nighttime lighting for street lighting (on Eastbluff Drive, Vista Del Oro, and Mar Vista Drive), parking, campus buildings, swimming pool, tennis courts, and the Proposed Project/alternative lit athletic fields, as the Use of School Facilities Under the Civic Center Act shows that artificial turf fields, swimming pools, and tennis courts could all be lighted at the same time. This additional analysis would constitute new information and requires recirculation of the EIR per CEQA Guidelines 15088.5.

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<sup>1</sup> Source: ANSI/IES RP-8-14, Table 6: Recommended Values for Low Pedestrian Conflict Areas – Maintained Illuminance Values for Walkways.



## **SECTION 5.6 - NOISE**

### **Noise from Sports Field**

The Eastbluff Association stated their concerns about the proposed noise associated with the sports field in their comment letter on the Revised Initial Study, dated May 23, 2016. The concerns from pages A-12 and A-13 of this letter were:

*The Recirculated Initial Study indicates that noise monitoring at certain locations will occur prior to the preparation of the Draft Environmental Impact Report. Only two locations within the Eastbluff Association are proposed to be monitored on Figure 14 and Table 3—those are referenced as “N-4” and “N-8”. Additional locations with the Eastbluff Association must be monitored. As more specifically described in our cover letter and Exhibit “B” thereto, the Eastbluff Association uniquely overlooks the Proposed Project site.*

*Given the change of elevation, topography, and orientation, the residences in the Eastbluff Association will be most affected by the Proposed Project’s anticipated noise generation.*

*All other proposed monitoring locations are either at the same or a lower elevation compared to the Proposed Project and thus are meaningless to understand the foreseeable noise impact the Proposed Project will have on those who will be most affected (that being the Eastbluff Association).*

*The impact on the Eastbluff Association’s residence cannot be sufficiently understood or analyzed using only two baseline noise monitoring locations. As a result, the cumulative effect of noise if the Proposed Project were to be constructed and used cannot be adequately understood and analyzed based on the proposed monitoring locations identified on Figure 14 and Table 3.*

*The Eastbluff Association requests that six additional noise level monitoring locations be added within our community—specifically, we request that locations be added on Aralia Street, Aleppo Street, Arbutus Street, Alta Vista Drive, Bamboo Street, and Blackthorn Street.*

*Absent the inclusion and consideration of additional noise monitoring locations within the Eastbluff Association in the Draft Environmental Impact Report, any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.*

In the Draft EIR, three noise measurement locations are within Eastbluff. Noise measurement location N-4 is located in a greenspace area within Eastbluff, is 2,000 feet northeast of the project site, and is in close proximity to Jamboree Road. Noise measurement location N-8 is on Alder Street within Eastbluff, is 1,400 feet east of the project site, and is in close proximity to Jamboree Road. Both of these locations are a significant distance from the Proposed Project site, while homes within Eastbluff are located immediately east of Eastbluff Drive, yet only noise measurement location (N-7) reflects these homes which likely be the most adversely affected by the Proposed Project’s noise generation.

Given Eastbluff’s close proximity to the CdM campus and the need for representative locations within Eastbluff for noise measurements, we requested six additional noise measurement locations be added to



those shown in RIS Figure 14 for the Draft EIR analysis. This request was included in our comments on the Recirculated Initial Study, and specifically requested locations be added on Aralia Street, Aleppo Street, Arbutus Street, Alta Vista Drive, Bamboo Street, and Blackthorn Street.

The locations were not included in the Draft EIR analysis. Thus, the Draft EIR has failed to adequately analyze the noise impacts to the Eastbluff homeowners as the six requested streets within our neighborhood were not included and are important due to the increase in elevation from the sports field location. Also, noise impacts from the sports field were identified were identified as Areas of Controversy in the Draft EIR and thus the importance of additional noise measurement locations were well known.

While the Draft EIR concludes significant and unavoidable sports field noise at nearby homes and exceedances of the City's exterior and interior noise limits, the noise analysis does not fully identify impacts on the surrounding community, and specifically to the Eastbluff Association. This is due to the lack of representative locations within Eastbluff that are in close proximity to the CdM campus and reflective of the topography. The Draft EIR needs to be revised to include additional short-term and long-term noise measurements and analysis for locations on Aralia Street, Aleppo Street, Arbutus Street, Alta Vista Drive, Bamboo Street, and Blackthorn Street, as the Eastbluff Association requested in May 2016.

### **Noise from Private Users of Proposed Project**

In its comment letter on the Recirculated Initial Study, the Eastbluff Association expressed concerns about noise from private users of the Proposed Project. The notes included in the revisions to the Use of School Facilities Under the Civic Center Act adopted by the Board of Education in August 2016 (notes from the revisions included below) have provided the Eastbluff Association with the necessary assurances regarding no private use of the artificial turf field area and thus no additional noise beyond that public agency use schedule and time limits shown earlier in this letter.

### **Performance Standards for Mitigation Measures**

The Eastbluff Association is concerned about conformance with Draft EIR mitigation measures (listed below) and the application of noise controls in compliance with District's Rule and Regulation, Use of School Facilities Under the Civic Center Act. Noise generated from the Proposed Project would result in substantial noise increases at nearby homes and there would be exceedances of the City's exterior and interior noise limits.

#### Noise Mitigation Measures

- "N-1 Prior to holding the first spectator event, the Newport-Mesa Unified School District (N-MUSD) shall develop and enforce a good-neighbor policy for sports field events. Signs shall be erected at entry points that state prohibited activities during an event (e.g., use of air horns, unapproved audio amplification systems, bleacher foot-stomping, boisterous activity in parking lots upon exiting the field) and monitored by the N-MUSD staff.
- N-2 During subsequent design phases of the bleachers and PA system, the Newport-Mesa Unified School District's sound system contractor shall create a Stadium Sound System Design Plan. The project's sound system design goal should be to optimize conveying information to the event

attendees while minimizing off-site spill-over effects. The design shall aim at incorporating as many low-power speakers as practical that are located as close to the event attendees as practical. The design should include specifications that optimize the sound system for speaker placement, speaker dispersion pattern, and speaker acoustic output. The design goal should be a Speech Transmission Index (STI) of 0.65 or greater (or, equivalently, a Common Intelligibility Scale (CIS) of 0.83 or greater). Prior to the first sports field event, the public address system contractor should perform a system check-out to verify appropriate sound levels in the seating areas, as well as minimized spill-over sound levels into the adjacent community areas.

- N-3 Prior to holding the first spectator event, the Newport-Mesa Unified School District shall construct a barrier wall system along the rear of the visitor side bleachers. Based on the analysis in this report, the barrier should extend 5.5 feet above the back end of the visitor side bleachers, and extend approximately 11 feet to the east and west of the ends of the bleachers. Given the complex geometry, the wall shall be optimized through detailed acoustical investigations considering the cost-benefit ratio for the sound barrier wall in terms of benefits at the most-affected sensitive receptors.”

The Eastbluff Association believes there is need for performance standards and monitoring to ensure noise levels remain at or below those quantified in the Draft EIR. Thus, the Eastbluff Association recommends the following performance standards or monitoring measures:

1. The Newport-Mesa Unified School District (District) shall hire the public address system contractor or other qualified public address system consultant to conduct an annual system check-out to verify appropriate sound levels in the seating areas, as well as minimized spill-over sound levels into the adjacent community areas. The results of the system-check shall be provided in written form to the District, and the District shall have the contractor make any necessary adjustments or repairs to the system to comply with the Final Environmental Impact Report noise conclusions. The annual update information shall be made publicly available on the District's website.
2. Annually, the Newport-Mesa Unified School District (District) shall hire a qualified acoustical consultant to take noise measurements during an event on the sports field with the public address system at the same locations previously measured in the Final Environmental Impact Report, inclusive of the six additional locations identified by the Eastbluff Association. The results shall be summarized in a written report to the District and note consistencies or inconsistencies with the Final Environmental Impact Report noise conclusions. The report should identify how to correct any inconsistencies and the time frame to make the correction. The annual noise measurement information shall be made publicly available on the District's website.

### **Cumulative Noise Impacts**

Cumulative noise modeling and analysis of the CdM campus with the Proposed Project was not provided in the Draft EIR. Additional modeling and analysis must be added to the EIR to reflect conditions showing a scenario with multiple/overlapping events on the CdM campus with the Proposed Project, in addition to

concurrent events at Our Queen Lady of Angels Church. This additional analysis would constitute new information and requires recirculation of the EIR per CEQA Guidelines 15088.5.

## **EIR SECTION 5.9 AND APPENDIX G - TRAFFIC MANAGEMENT PLAN**

The Traffic Management Plan (TMP) states on Appendix G page G2-1 that “The large events anticipated to occur at the sports field site include graduations and athletic events that would typically outside of the normal school hours.” Based upon this, it appears that the TMP addresses only a single event and not multiple/overlapping events occurring on the CdM campus.

The TMP and analysis in Section 5.9 does not fully address the traffic and parking impacts to the surrounding community. The TMP must be revised to incorporate the following:

1. Add discussion that on-street parking on Vista Del Oro and Mar Vista Drive is prohibited during an event.
2. Acknowledge existing residential permit program on the Eastbluff homes A-Streets that prohibits student and school parking.
3. Describe how large events would be coordinated with other peak hour traffic conditions (weekday or weekend) in Eastbluff and the City of Newport, and any additional measures that would be needed.
4. Describe how the TMP creates the ensures the least amount of traffic impacts and no parking impacts to surrounding residences and the OLQA church.
  - a. Develop measures and timing regarding pre-event notification to surrounding community (residents, homeowner associations, and churches). Consider use of the CdM Middle and High School website to create a Community Event Notification section, as well as mailings to residents, churches, and homeowner associations.
  - b. Develop suggested directions for the surrounding community members to utilize prior to and during events to best assist with going to and from their home or church.
5. Describe and add measures to ensure pedestrian safety is provided for those attending an event and the surrounding community.
6. Describe the traffic and parking program if multiple/overlapping events occur at the same time.

Given the deficiencies in the TMP, it is not possible to conclude that Proposed Project would result in less than significant traffic access and parking impacts to the surrounding community. The impact conclusion of less than significant is incorrect, incomplete, unsupported, and needs to be revised. This conclusion revision requires recirculation of the EIR.

## **SECTION 5.9 - PARKING**

Page 5.9-1 states that “Typical school activities occur between 8:00 AM to 3:00 PM and the proposed project would allow activities to occur outside of this time period.” This is not correct. Based on the CdM 2016-2017 Bell Schedule, school activities start prior to the 6:50 AM early bell. Where referenced in the Draft EIR, the text must be revised to reflect the early bell schedule and allow for faculty and staff to arrive and leave the campus. Thus, the typical school activities are occurring between 6:30 AM and 3:30 PM.

The Draft EIR does not state what events or activities were occurring on the CdM campus or if the pool or tennis courts were open when the parking counts were collected on Friday March 4, 2016 at 6:00, 7:00, and 8:00 PM. Without a clarification to on-campus activities at the time of the counts, this information should be referenced that it is for informational purposes only. The quantification of the 246 on-street parking spaces on Vista Del Oro and Mar Vista Drive provides background information. However, Table 5.9-16 references the 246 spaces, but does not indicate if the on-street spaces were or were not occupied by persons using on-campus facilities or sports fields at that time. This information should be referenced that it is for informational purposes only. Also, we have previously commented that the TMP needs to include the restriction that on-street parking on Vista Del Oro and Mar Vista Drive be prohibited during an event.

To gain a better understanding of sports event parking on the CdM campus, parking counts should have been collected for a game/match in the evening hour. In addition, parking counts at other District high school facilities for an evening game/match could have been collected to provide a comparable baseline for the environmental analysis. The parking counts collected in March 2016 do not provide an appropriate baseline for the Draft EIR analysis. The parking counts must be recounted during an evening game/match and the environmental analysis revised. This revised analysis would constitute new information and requires recirculation of the EIR per CEQA Guidelines 15088.5.

The following conclusion is stated on Page 5.9-56, "The CdM campus has adequate parking capacity for full-capacity events, and parking impacts would be less than significant." As discussed above, the impact conclusion of less than significant is incorrect, incomplete, unsupported, and needs to be revised. This conclusion revision requires recirculation of the EIR.

### **Cumulative Parking Impacts**

Cumulative parking analysis of the CdM campus with the Proposed Project was not included in the Draft EIR. Additional analysis must be added to the EIR to reflect conditions showing a scenario with multiple/overlapping events on the CdM campus with the Proposed Project and events at Our Lady Queen of Angels Church. This additional analysis would constitute new information and requires recirculation of the Draft EIR per CEQA Guidelines 15088.5.

## **SECTION 7 – ALTERNATIVES**

The Draft EIR provides a brief discussion on page 7-31 of how only Community Plan Alternative 1 meets the project objectives. The Draft EIR must include a discussion for each alternative of how it meets the project objectives. This discussion should state which objectives can be met, which ones can be partially met and why, and which objectives cannot be met and why.

This discussion is critical to enable the decision-maker to reasonably consider the alternatives and make an informed decision understanding the anticipated environmental impacts of the proposed project and its alternatives as required by CEQA.

This discussion can be included with the conclusion for each alternative. It is recommended that Draft EIR subsections 7.5.11, 7.6.11, 7.7.11, and 7.8.11 be renamed to Conclusion and Ability to Meet Project Objectives.

## **BOARD OF EDUCATION SELECTION OF PROJECT ALTERNATIVE**

Based upon a review of the March 7, 2017 Board of Education Study Session, the Board discussed with District staff the possibility of selecting an alternative to the Proposed Project and what implications that would have related to CEQA.

CEQA Guidelines Section 15126.6(d) specifies the level of analysis need for alternatives to the proposed project.

*(d) Evaluation of alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.*

Since the Draft EIR did not include an alternatives summary table, we have provided one on the following pages that provides an impact comparison of the Proposed Project with the four alternatives reviewed in the Draft EIR. The table notes if impacts were equal to, less than, or greater than the Proposed Project. The table also notes if a significant and unavoidable impact is eliminated or reduced for each alternative. And lastly, the table indicates if an alternative meets the project objectives.

As shown on the summary table, a number of topical areas have been identified as resulting in greater impacts than the Proposed Project. In general, the impact discussion for each of the four alternatives in the Draft EIR provides a broad-level review and conclusion.

The summary table shows that Community Plan Alternative 1: Two Fields with Reduced Capacity and No Lights would achieve most of the project objectives and reduce significant field lighting and noise impacts. In actuality, Community Plan Alternative 1 eliminates all field lighting impacts as no lights would be installed. Under Community Plan Alternative 1, impacts relative to field lighting and noise are significantly reduced to the Eastbluff Association. It is for these reasons that the Eastbluff Association supports Community Plan Alternative 1.

Community Plan Alternative 3 includes permanent lighting with four metal halide light poles provided for nighttime events and practices on the main sports field and on the second field. All eight permanent light poles would be 80-foot high each supporting 14 luminaires per pole. Light and glare modeling and analysis has not been prepared for this Alternative. If the Board is going to consider approval of Community Plan Alternative 3, additional analysis would be needed at a minimum for light and glare, noise, traffic, and parking to fully detail whether the Alternative would or would not cause new potentially significant impacts or new significant and unavoidable impacts, or if new mitigation is needed for those impacts. This additional analysis, which could identity new impacts or mitigation measures, would constitute new information and requires recirculation of the Draft EIR per CEQA Guidelines 15088.5.

**Comparison of Proposed Project and Alternatives  
Summarized from Draft EIR**

Impact Area	Proposed Project	No Project Alternative	Community Plan Alternative 1: Two Fields with Reduced Capacity and No Lights	Community Plan Alternative 2: Two Fields with Reduced Capacity and Portable Lights	Community Plan Alternative 3: Two Fields with Reduced Capacity and Permanent Lights
	<i>Impact Conclusion</i>	<i>Impact Comparison to Proposed Project</i>	<i>Impact Comparison to Proposed Project</i>	<i>Impact Comparison to Proposed Project</i>	<i>Impact Comparison to Proposed Project</i>
Aesthetics					
Scenic Vista	Less Than Significant	Less	Less	Less	Less
Visual Character	Less Than Significant	Less	Less	<b>Greater</b>	<b>Greater</b>
Light & Glare	Less Than Significant After Mitigation	Less	Less	<b>Greater</b>	<b>Greater</b>
Air Quality					
Consistency with Regional Plans	Less Than Significant	Less	Equal	Equal	Equal
Exceed SCAQMD Thresholds - Construction	Less Than Significant	Less	Equal	Equal	Equal
Exceed SCAQMD Thresholds – Long-Term	Less Than Significant	<b>Greater</b>	<b>Greater</b>	<b>Greater</b>	<b>Greater</b>
Sensitive Receptors - Construction	Less Than Significant	Less	Equal	Equal	Equal
Sensitive Receptors - Operations	Less Than Significant	Equal	Equal	Equal	Equal
Cultural Resources					

Impact Area	Proposed Project	No Project Alternative	Community Plan Alternative 1: Two Fields with Reduced Capacity and No Lights	Community Plan Alternative 2: Two Fields with Reduced Capacity and Portable Lights	Community Plan Alternative 3: Two Fields with Reduced Capacity and Permanent Lights
	<i>Impact Conclusion</i>	<i>Impact Comparison to Proposed Project</i>	<i>Impact Comparison to Proposed Project</i>	<i>Impact Comparison to Proposed Project</i>	<i>Impact Comparison to Proposed Project</i>
Archaeological Resources	Less Than Significant After Mitigation	Less	Equal	Equal	Greater
Paleontological Resources	Less Than Significant After Mitigation	Less	Equal	Equal	Greater
Greenhouse Gas Emissions	Less Than Significant	Greater	Greater	Greater	Greater
Hydrology, Drainage, and Water Quality					
Exceed Capacity of Stormwater Drainage System	Less Than Significant After Mitigation	Less	Greater	Greater	Greater
Compliance with General Construction Permit	Less Than Significant After Mitigation	Less	Greater	Greater	Greater
Noise					
Long-Term Operations - Exceedance of Local Standards	Less Than Significant	Less	Less	Less	Less
Sports Field – Temporary Noise Exceedance of City Noise Limits	Significant and Unavoidable	Less	Less	Less	Less



Impact Area	Proposed Project	No Project Alternative	Community Plan Alternative 1: Two Fields with Reduced Capacity and No Lights	Community Plan Alternative 2: Two Fields with Reduced Capacity and Portable Lights	Community Plan Alternative 3: Two Fields with Reduced Capacity and Permanent Lights
	<i>Impact Conclusion</i>	<i>Impact Comparison to Proposed Project</i>	<i>Impact Comparison to Proposed Project</i>	<i>Impact Comparison to Proposed Project</i>	<i>Impact Comparison to Proposed Project</i>
Reduce or Eliminate Significant and Unavoidable Impact?		Eliminate	Reduce	Reduce	Reduce
Groundborne Vibration or Noise	Less Than Significant	Less	Less	Less	Less
Temporary Noise Increases - Construction	Less Than Significant	Less	Less	Less	Less
Public Services					
Fire Protection and Emergency Services	Less Than Significant	Less	Less	Less	Less
Police Protection	Less Than Significant	Less	Less	Less	Less
Recreation	Less Than Significant	Less	Equal	Equal	<b>Greater</b>
Transportation and Traffic					
Project-Trip Generation – Conflict with Applicable Plan, Ordinance or Policy Establishing Measures of Effectiveness or Performance	Less Than Significant After Mitigation	Less	Less	Less	Less
Conflict with County Congestion Management Program	Less Than Significant	Less	Less	Less	Less
Hazards Due to Design Feature or Inadequate Access	Less Than Significant	Less	Less	Less	Less
Inadequate Parking Capacity	Less Than Significant	Less	Less	Less	Less

Impact Area	Proposed Project	No Project Alternative	Community Plan Alternative 1: Two Fields with Reduced Capacity and No Lights	Community Plan Alternative 2: Two Fields with Reduced Capacity and Portable Lights	Community Plan Alternative 3: Two Fields with Reduced Capacity and Permanent Lights
	<i>Impact Conclusion</i>	<i>Impact Comparison to Proposed Project</i>	<i>Impact Comparison to Proposed Project</i>	<i>Impact Comparison to Proposed Project</i>	<i>Impact Comparison to Proposed Project</i>
Energy	Less Than Significant	Equal	Equal	Equal	<b>Greater</b>
Meets Project Objectives	Yes	No	Yes	Yes	Yes
			Would not achieve some of the project objectives and would not meet the project objectives to the degree achieved by the proposed project.	No discussion in Draft EIR	No discussion in Draft EIR
<p>Equal      Indicates an impact that is equal to the proposed project</p> <p>Greater      Indicates an impact that is greater than the proposed project</p> <p>Less      Indicates an impact that is less than the proposed project</p>					

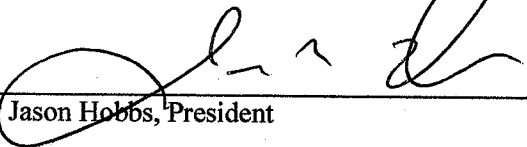
## CONCLUSION

We look forward to continued constructive discussions with the District so that any change in the Proposed Project will: 1) be refined so that it benefits both the students attending CdM campus and not significantly impact the environment surrounding the CdM campus, and 2) will be compatible with our goal of maintaining our existing environment and quality of life. This goal is consistent with statements made by the Board of Education instructing District staff that the improvements must be based on a "good neighbor" approach and acceptance by the neighbors.

Thank you for the opportunity to comment on the Draft EIR. Eastbluff Association trusts that the Board of Education and District staff will work to resolve the serious concerns addressed above with the Draft EIR and make the changes necessary to protect the health, safety, and well-being of Eastbluff Association's members, residents, and guests.

Respectfully submitted,

The Eastbluff Community Homeowners Association  
Board of Directors by

  
\_\_\_\_\_  
Jason Hobbs, President

**ATTACHMENT A**

**Eastbluff Homeowners Community Association's Public Comment on the Recirculated Initial  
Study for the Proposed Corona del Mar High School Sports Field Project (May 23, 2016)**



**VIA HAND DELIVERY AND EMAIL ([feedback@nmusd.us](mailto:feedback@nmusd.us))**

May 23, 2016

Newport-Mesa Unified School District  
Education Center  
2985 Bear Street, Building A  
Costa Mesa, California 92626  
Attention: Ara Zareczny, Facilities Analyst, LEED/AP

**Re:** Eastbluff Homeowners Community Association's Public Comment on the Recirculated Initial Study for the Proposed Corona del Mar High School Sports Field Project

Dear Ms. Zareczny:

The purpose of this letter is to submit the public comments of the Eastbluff Homeowners Community Association ("Eastbluff Association") regarding the Recirculated Initial Study ("Recirculated Initial Study") prepared for the Newport-Mesa Unified School District ("NMUSD") concerning its proposed project ("Proposed Project") at Corona del Mar High School ("CdMHS").

The project originally consisted of the replacement of the existing track and field at CdMHS, and the addition of limited new seating, at an estimated cost of \$7.4 million dollars to the District (the "Track and Field Replacement"). The Eastbluff Association has not, and does not, object to the Track and Field Replacement.

Thereafter, the CDM Foundation ("Foundation"), a private organization, proposed to fund the construction of a lighted football stadium at CdMHS ("Stadium") instead of the originally proposed project. This addition to the project was proposed to include a reconfigured track and field for dual football and track and field purposes, a press box, home and visitor stands, a public address system, six 80 foot high light poles, new fencing, a 3,000 square foot building (housing home and visitor ticket booths, a concession stand, storage, and bathrooms), destruction of existing landscaping, and the loss of existing practice field area (collectively the "Proposed Project"). These additions to the original project will cost an estimated additional \$4 million dollars.

The Foundation was ultimately unable to raise the extra funding for the Stadium. NMUSD is now proposing to construct the Stadium.

The Eastbluff Association contains and represents 460 single family homes located in close proximity to CdMHS. The information we are providing in this public comment letter represents the overwhelming opinion of our members and is documented by numerous community meetings, discussions by the Homeowners Association Board of Directors, research and outreach by the Board-appointed member committee, and the recently completed homeowner survey evaluating the Recirculated Initial Study.

As noted above, we wish to make it clear from the outset that we are not opposed to the Track and Field Replacement at CdMHS. However, we strenuously oppose the addition of the lighted stadium to the project for the reasons set forth in this letter.

It is without question that our community will be severely and negatively impacted by the construction of a lighted stadium at CdMHS. Our community is built on a hill. A significant portion of that hill overlooks CdMHS and,



therefore, the location of the Proposed Project. The homes in our community nearest to the high school are less than 150 feet from the Proposed Project. Starting there, our community rises up on our hill all the way to Jamboree Road. The top of our community is approximately 100 feet higher in elevation than the Proposed Project's site.

Should the Proposed Project be built, all of the nearby residential communities will suffer significant environmental impacts. However, the unique position of our community relative to the Proposed Project site and our community's unique topographic characteristics will cause us to suffer multiple, diverse, and extensively significant environmental impacts which will be of types, magnitude, and intensity greater than any of the other nearby residential and commercial developments.

Our community was designed to take full advantage of views from our homes. Many of those views are directly across the Proposed Project site. These views include the City of Newport Beach, Newport Harbor, Back Bay, the horizon towards the Pacific Ocean, Catalina Island, the Costa Mesa/Huntington Beach vista, Palos Verdes, and mountains to the north and west.

In addition to views, the configuration of the hill upon which our homes are built, combined with the differences in elevation from the lower homes to the higher homes, creates a bowl. This bowl surrounds CdMHS and the Proposed Project site. Noise from CdMHS radiates up our residential streets nearest the school to homes at the top of the hill. A noise tunnel effect sends school noise from events, especially in the early morning and evening, far up into our community. The NMUSD and the City of Newport Beach recognized the existence of this effect when they constructed the existing sound wall for the joint-use Marion Bergeson swimming pool. The proposed lighted stadium uses will result in significantly more noise than the current field and track use, will introduce permanent and regular night use to the track and field for the first time in the school's 50-year history, and will negatively impact the existing environment of our community.

Since the construction of CdMHS and the surrounding homes in the 1960's, the residential areas have remained essentially the same. What has changed drastically is CdMHS. Residential growth elsewhere in the City of Newport Beach, the District's decision to open a middle school at CdMHS, the small campus, and a single street providing the only direct access to the school have inexorably led to the following:

- Overcrowding of the school;
- Too many cars trying to access the school;
- Not enough on-site school parking;
- Students parking off-site;
- Students running across streets to and from school in heavy traffic; and
- Traffic jams on the surrounding streets which were designed for much smaller traffic loads.

In addition, multiple nearby residential projects presently under construction and in planning will exacerbate all of these problems.

Our Eastbluff community has a very diverse population. Our homeowners range from families with young children who are new to the Eastbluff Association to long term residents who have lived in their homes for more than 40 years. Many homes are occupied by second generation family members. We love our neighborhood and its peace and quiet, especially in the evening. The installation of a lighted stadium at CdMHS threatens us with the disruption of our existing living environment and will significantly impact the quality of life our community has experienced for the past 50 years.

Our homeowners are mobilized and very active in expressing their deep concerns over the lighted stadium. We are



acutely aware that our homes are vulnerable to the impacts which will result from the lighted stadium such as increased noise, glare from lights, impairment of daytime and nighttime views, increased traffic impacting our ability to enter and leave our community, and significantly increased parking on our residential streets.

The addition to the project of a lighted stadium is incompatible with the immediate residential surroundings. The inevitable significant environmental impacts of the Proposed Project on our community have compelled the Eastbluff Association to engage a team of professionals to assist with this process, including legal counsel, Land Use EIR consultants, and others.

We request you recognize our strong concerns about the lighted stadium elements of the Proposed Project which will cause diverse significant environmental impacts that must be further studied. Those studies need to provide data and analysis as to how those significant environmental impacts will affect our community so that you can change the Proposed Project design and operational uses to avoid such negative impacts.

We hope to work with NMUSD in a constructive manner so that any change in the existing track and field use will be compatible with our goal of maintaining our environment and our quality of life. This goal is consistent with statements made by the NMUSD Board of Trustees instructing Board staff that the improvements must be based on a “good neighbor” approach and acceptance by the neighbors.

The Recirculated Initial Study provides a preliminary evaluation of the potential environmental consequences associated with the construction and use of the Proposed Project. We concur with the finding on page 37 that the “proposed project MAY have a significant effect on the environment, and an Environmental Impact Report is required.” Additionally, we believe the changes described in *Section 1.3 – Project Description* which starts on page 9 and continues to page 31, and the proposed use and schedule as reported on page 29, have significant environmental impacts on the Eastbluff Association’s residents which must be addressed in the Draft Environmental Impact Report and resolved before School Board approval.

As the largest single family homeowners association near the Proposed Project, we urge the School District to work with us in reviewing the stadium elements of the Proposed Project and the proposed operational uses in order to define a project that both benefits the students attending CdMHS and does not significantly impact the environment surrounding the school property.

Exhibit “A” to this letter provides specific comments on the Recirculated Initial Study’s contents as related to the Proposed Project’s significant environmental impacts. Exhibit “B” to this letter discretely addresses and identifies how our community will suffer from significant environmental impacts due to the Proposed Project.

In conclusion, we strongly urge the School District to establish a process to meet with the Board of Directors of the Eastbluff Association to discuss proposed changes to the sports field complex project design and the associated use and schedule details in order to identify changes to the plan which will eliminate and or mitigate these vast significant environmental impacts.

Respectfully submitted,

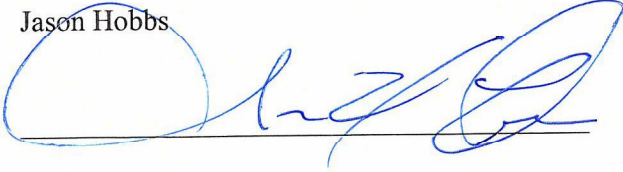
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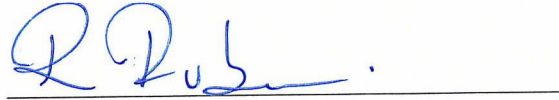


The Eastbluff Community Homeowners Association  
Board of Directors

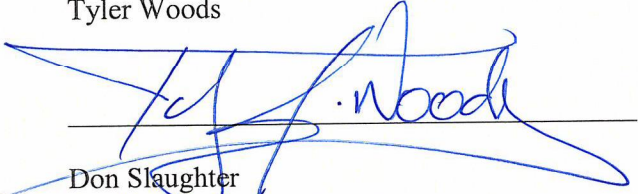
Jason Hobbs



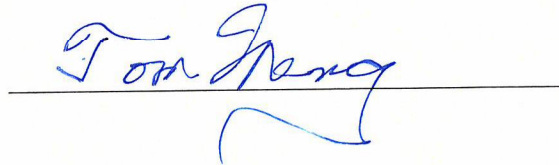
Ron Rubino



Tyler Woods



Tom Meng



Don Slaughter





## EXHIBIT "A"

### Eastbluff Homeowners Community Association's Public Comment on the Recirculated Initial Study Concerning Corona del Mar High School Sports Field Project

Page	Section	Comment on the initial Study
1	1.2.1 Existing Land Use – Gymnasium	<p>The Recirculated Initial Study fails to specify the seating capacity of the identified gymnasium, the types of uses therein, and the anticipated frequency of its use which will overlap with any anticipated time the Proposed Project will be used.</p> <p>Various impacts of the Proposed Project, including, in part, the impact on traffic around CdMHS, parking at CdMHS, and spill-over parking onto the public streets, including within the Eastbluff Association, cannot be assessed without establishing and including such information.</p> <p>Further research and consultation with CdMHS' administration should occur prior to the preparation of the Draft Environmental Impact Report to identify other common on-campus gathering and event facilities that have been omitted or identified with incomplete information so that all such facilities are properly and fully considered in analyzing the Proposed Project's environmental impacts.</p> <p>All of the above information should be included and considered in the Draft Environmental Impact Report; otherwise any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>
10	1.3.1 Proposed Land Use – Sports Field and Bleachers	<p>The Recirculated Initial Study does not identify the proposed bleachers with sufficient detail to analyze the environmental impacts of their anticipated use. For example, the Recirculated Initial Study does not state the proposed materials from which the proposed bleachers will be constructed. The type of materials will influence the amount of noise generation from the anticipated use of the proposed bleachers.</p> <p>Such information should be included in the Draft Environmental Impact Report; otherwise any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>
10	1.3.1 Proposed Land Use – Lighting System	<p>The Recirculated Initial Study does not identify the proposed lighting system with sufficient detail to analyze the environmental impacts of that system's anticipated use. For example, the Recirculated Initial Study does not state the number of lights anticipated on each of the eight 80' poles proposed to be installed, the type of lights anticipated</p>



		<p>to be installed, the wattage of each of those lights, the lighting system’s total wattage, and the designed precautions to avoid glare into adjacent properties.</p> <p>Such information should be included in the Draft Environmental Impact Report otherwise any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>
10	1.3.1 Proposed Land Use – Public Address System	<p>The Recirculated Initial Study does not identify the proposed public address system with sufficient detail to analyze the environmental impacts of that system’s anticipated use. For example, the Recirculated Initial Study does not state the number of speakers anticipated to be installed, the size of those speakers, the individual decibel capacity of each type of speaker, the aggregative total decibel capacity of all speakers, the anticipated individual decibel level to be used for different purposes, the anticipated aggregative decibel level to be used for different purposes, the anticipated frequency of use, and the anticipated hours of use.</p> <p>Such information should be included in the Draft Environmental Impact Report otherwise any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>
30	1 Introduction – Community Use	<p>The Recirculated Initial Study does not include sufficient detail concerning the anticipated community use of the Proposed Project to analyze the environmental impacts of the Proposed Project’s anticipated use. The Recirculated Initial Study acknowledges that “community use” of the Proposed Project would occur, as purportedly required by the Civil Center Act, though that anticipated use is neither quantified nor qualified.</p> <p>For example, the Recirculated Initial Study does not state the anticipated frequency of use for community events, the anticipated hours of use for community events, the anticipated types of community events that would occur, and the anticipated number of persons and associated vehicles attending anticipated community events. Numerous anticipated significant environment impacts, including, in part, noise, light, traffic, parking, emergency services, and pollution cannot be analyzed without accounting for this information since the anticipated intensity of use of the Proposed Project will be unknown.</p> <p>Such information should be included in the Draft Environmental Impact Report otherwise any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>



30	1 Introduction – Concurrent Use of School Facilities	<p>The Recirculated Initial Study does not include sufficient detail concerning the anticipated concurrent use of the Proposed Project with other on-campus school or community functions and gatherings. The Recirculated Initial Study vaguely states that it “anticipates that swimming events and other major school events would not be scheduled at the same time as major, at-capacity events at the football / track-and-field facility”, but fails to explain the meaning and significance of that statement. Why is this anticipated? Has CdMHS agreed to such? What does “major, at-capacity events” mean? How does CdMHS know in advance which scheduled football games will be “major, at-capacity events?” What does “other major school events” mean? Does “at the same time” include any buffer of time between the anticipated ending time of one event before the start of another? The myriad ambiguities inherent in this statement render it virtually meaningless. Moreover, this vague speculation, which is not justified and necessary, vitiates any ability to understand and analyze anticipated cumulative environmental impacts of the Proposed Project.</p> <p>Such details should be included in the Draft Environmental Impact Report otherwise any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>
31	1 Introduction – Highest Spectator Events, Worst Case	<p>The Recirculated Initial Study erroneously identifies 1,000 end users at 10 p.m. as the worst case scenario of operating the Proposed Project in the evening for a Friday night football event. In reality, it is foreseeable that such a full-capacity event would include, at minimum, 1,500 plus persons as that figure excludes, in part, the participants in those events, coaches, cheer and pep squads, marching bands, press members, medical staff, security staff, janitorial staff, operators of the ticket booth, operators of the concession stands, operators of the press box, and operators of the scoreboard, electronics, lighting, and public address system etc.</p> <p>The Recirculated Initial Study appears to erroneously assume that the environmental impacts of the Proposed Project’s use will end at 10 p.m. because the football game will end at that time. The Recirculated Initial Study does not indicate that the Proposed Project’s lights will be turned off by 10 p.m., that the use of the Proposed Project’s public address system will cease by 10 p.m., that all of the anticipated spectators, participants, school staff, vendors, workers, and others present at the event will have left the Proposed Project by 10 p.m., that all of the same people who parked in CdMHS’ parking lots will have driven away by 10 p.m., that all of the same people who parking on public streets near CdMHS, including with the Eastbluff Association, will have driven away by 10 p.m., that</p>



		<p>all of the same people who traveled to the event via public transportation will have boarded departing public transportation by 10 p.m. etc.</p> <p>The Recirculated Initial Study also appears to assume that no other school or public events will be simultaneously occurring at CdMHS, which may be an erroneous assumption. Moreover, the Recirculated Initial Study fails to account for foreseeable concurrent worship-related, school-related, and public-related events at Our Lady Queen of Angels Catholic Church, which is located across the street from the CdMHS, and which contains a kindergarten through eighth grade school with hundreds of students. The Eastbluff Association understands that Our Lady Queen of Angeles Catholic Church has proposed the construction of a new, large gymnasium on its property must also be accounted for in analyzing the Proposed Project’s cumulative significant environmental impacts.</p> <p>Simply put, the worst case scenario is in fact dramatically worse than that contemplated in the Recirculated Initial Study, which will cause significantly greater environmental impacts in scope, magnitude, and duration than suggested in the Recirculated Initial Study.</p> <p>The Eastbluff Association agrees that the worst case scenario must be accounted for and analyzed in the Draft Environmental Impact Report, just as foreseeable concurrent on-campus and nearby events must be accounted for and analyzed.</p> <p>Absent the inclusion and consideration of the true foreseeable worst case scenario in the Draft Environmental Impact Report, any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>
32	1.3.3 Alternatives	<p>Beyond the enumerated alternatives to be considered specified in the Recirculated Initial Study, consideration of remote parking for students attending the game and working the facility should be considered. Also parking lot expansion at the school or a parking structure in the rear area of the property should be included as a primary prerequisite improvement. Addressing the current lack of school facilities parking is required to fully analyze the Proposed Project’s environmental impacts on traffic congestion, parking availability, and public safety access to the fields and surrounding homes.</p> <p>This should be included in the Draft Environmental Impact Report otherwise any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>



		<p>Additionally, the Draft Environmental Impact Report should address the alternative of continuing the use of other lighted fields in the immediate area when a lighted field is needed by CdMHS, which has been the practice followed by NMUSD and CdMHS for the last 50 years. The need to change that practice must be detailed and supported with facts. This analysis will be especially timely given that two new lighted District fields have been added in the past few years.</p> <p>This should be included in the Draft Environmental Impact Report otherwise any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>
47	3.1 Aesthetics – Question “a”	The Eastbluff Association agrees with the “potential significant impact” finding due to the material adverse effect the Proposed Project will have on numerous scenic vistas, including those within the Eastbluff Association and those affecting the Eastbluff Association’s membership. Accordingly, the Eastbluff Association requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
47-48	3.1 Aesthetics – Question “b”	The Eastbluff Association agrees with the “potential significant impact” finding due to the material adverse effect the Proposed Project will have on numerous scenic resources, including those within the Eastbluff Association and those affecting the Eastbluff Association’s membership. Accordingly, the Eastbluff Association requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
48	3.1 Aesthetics – Question “c”	The Eastbluff Association agrees with the “potential significant impact” finding due to the substantial degradation the Proposed Project will have on existing visual character and quality of the site and surroundings, including that of the Eastbluff Association and those affecting the Eastbluff Association’s membership. Accordingly, the Eastbluff Association requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
51	3.1 Aesthetics – Question “d”	<p>The Eastbluff Association agrees with the “potential significant impact” finding due to the new sources of substantial light or glare, due to the Proposed Project, which would adversely affect day or nighttime views in the area, including that within the Eastbluff Association. Accordingly, the Eastbluff Association requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.</p> <p>The Recirculated Initial Study indicates that measurements of</p>





		<p>“existing nighttime light levels” will occur at certain locations prior to the preparation of the Draft Environmental Impact Report. Only one location within the Eastbluff Association is proposed to be measured on Figure 13—this is referenced as “View 4.” Additional locations with the Eastbluff Association must be measured. As more specifically described in our cover letter and Exhibit “B” thereto, the Eastbluff Association uniquely overlooks the Proposed Project site. Given the change of elevation, topography, and orientation, the residences in the Eastbluff Association will be most affected by the Proposed Project’s anticipated light and glare.</p> <p>Views 1, 2, and 3 on Figure 13 are all at the same or a lower elevation compared to the Proposed Project and thus are meaningless to understand the foreseeable light and glare impact the Proposed Project will have on those who will be most affected (that being the Eastbluff Association).</p> <p>The impact on the Eastbluff Association’s residents cannot be sufficiently understood or analyzed using only one baseline nighttime light level reading location. As a result, the cumulative effect of light and glare if the Proposed Project were to be constructed and used cannot be adequately understood and analyzed based on the proposed level reading locations identified on Figure 13.</p> <p>The Eastbluff Association requests that five additional nighttime light level reading locations be added within our community—specifically, we request that locations be added on Aralia Street, Aleppo Street, Alta Vista Drive, Alder Place, and Almond Place.</p> <p>Absent the inclusion and consideration of additional nighttime light level locations within the Eastbluff Association in the Draft Environmental Impact Report, any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p> <p>The Eastbluff Association also notes that CdMHS’ last day of school instruction will be June 23, 2016. Accordingly, we trust that the nighttime level readings will occur on a weeknight before then as the existing nighttime level readings will not be representative and the cumulative light and glare impact of the Proposed Project cannot be understood and analyzed if such readings are obtained during the weekend when the use of CdMHS’ facilities is known to be the lowest level and/or during the summer recess when again the use of CdMHS’ facilities is known to be the lowest level.</p>
53	3.3 Air Quality – Question “a”	<p>The Eastbluff Association agrees with the “potential significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental</p>





		impact.
53	3.3 Air Quality – Question “b”	The Eastbluff Association agrees with the “potential significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
54	3.3 Air Quality – Question “c”	The Eastbluff Association agrees with the “potential significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
54	3.3 Air Quality – Question “d”	The Eastbluff Association agrees with the “potential significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
54	3.3 Air Quality – Question “e”	The Eastbluff Association disagrees with the “less than significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact due to the foreseeable generation of objectionable odors that will affect a substantial number of people during the extensive demolition and construction of the Proposed Project.
55	3.4 Biological Resources – Question “a”	The Eastbluff Association disagrees with the “no impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact as the Proposed Project will have a substantial adverse effect on species identified as a candidate, sensitive, or special species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Services. The Proposed Project site is closely located to several locally, state, and federally-protected environmental areas. For example, CdMHS is located about 1,200 feet from the Upper Newport Bay State Marine Conservation Area. CdMHS is also in close proximity of the Upper Newport Bay Nature Preserve and Ecological Reserve, which is also part of the Upper Newport Bay (known as the Back Bay). Both protected areas provide critical habitat for around 200 sensitive or endangered species, including, in part, the salt marsh bird’s beak, the brown pelican, the light-footed clapper rail, Ridgeway’s rail, California black rail, California least tern, Lease Bell’s vireo, peregrine falcon, coastal California gnatcatcher, and Belding’s savannah sparrow. The Proposed Project will foreseeably cause significant light, glare, noise, and pollution to intrude on and substantially negatively affect the protected species in these habitats contrary to the Recirculated Initial Study’s bald assertion otherwise. Moreover, the physical characteristics of the Proposed Project will also substantially negatively affect the protected species as the light poles, among other



		<p>improvements, will substantially disrupt these species’ habitat and migratory patterns.</p> <p>Absent the inclusion and consideration of the Proposed Project’s effect on these species in the Draft Environmental Impact Report, any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>
55	3.4 Biological Resources – Question “b”	<p>The Eastbluff Association disagrees with the “no impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact as the Proposed Project will have a substantial adverse effect on riparian habitat and/or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Services. The Proposed Project site is closely located to several locally, state, and federally-identified riparian habitats and sensitive natural communities. For example, CdMHS is located about 1,200 feet from the Upper Newport Bay State Marine Conservation Area, which contains riparian habitats and sensitive natural communities. CdMHS is also in close proximity of the Upper Newport Bay Nature Preserve and Ecological Reserve, which also contains riparian habitats and sensitive natural communities. The Proposed Project will foreseeably cause significant light, glare, noise, and pollution to intrude on and substantively negatively affect these riparian habitats and sensitive natural communities contrary to the Recirculated Initial Study’s bald assertion otherwise.</p> <p>Absent the inclusion and consideration of the Proposed Project’s effect on these habitats and communities in the Draft Environmental Impact Report, any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>
55	3.4 Biological Resources – Question “c”	<p>The Eastbluff Association disagrees with the “no impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact as the Proposed Project will have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act. The Proposed Project site is closely located to one or more Section 404-classified protected wetlands and “other waters”. For example, CdMHS is located about 1,200 feet from Big Canyon Creek Watershed which contains about 14 acres of wetlands and 6 acres of “other waters” classified under and protected by Section 404 of the Clean Water Act. The Proposed Project will foreseeably cause significant light, glare, noise, and pollution to intrude on and substantively negatively affect these protected wetlands contrary to the Recirculated Initial Study’s bald assertion otherwise.</p>



		<p>Absent the inclusion and consideration of the Proposed Project’s effect on these wetlands in the Draft Environmental Impact Report, any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>
55-56	3.4 Biological Resources – Question “d”	<p>The Eastbluff Association disagrees with the “less than significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact as the Proposed Project will substantially interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. CdMHS is located about 1,200 feet from the Upper Newport Bay State Marine Conservation Area. CdMHS is also in close proximity of the Upper Newport Bay Nature Preserve and Ecological Reserve, which is also part of the Upper Newport Bay (known as the Back Bay). These areas provide habitat for 35,000 migratory birds, around 200 of which are sensitive or endangered species in addition to countless native or migratory fish or other wildlife. The Proposed Project will foreseeably cause significant light, glare, noise, and pollution to intrude on and substantially negatively affect these fish and wildlife contrary to the Recirculated Initial Study’s assertion otherwise.</p> <p>Absent the inclusion and consideration of the Proposed Project’s effect on these fish and wildlife in the Draft Environmental Impact Report, any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>
56	3.4 Biological Resources – Question “e”	<p>The Eastbluff Association disagrees with the “no impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact as the Proposed Project will conflict with local policies or ordinances protecting biological resources. The City of Newport Beach’s Municipal Code contains various Chapters protecting biological resources, including, in part and for example, Chapter 7.26 (Protection of Natural Habitat for Migratory and other Waterfowl) and Chapter 7.30 (Wildlife Protection). The City of Newport Beach’s General Plan contains various elements and policies protecting biological resources, including and for example, the entirety of Chapter 10 (Natural Resources Element). The Proposed Project will conflict with these policies and ordinances due to the Proposed Project’s creation of significant light, glare, noise, and pollution.</p> <p>Absent the inclusion and consideration of the Proposed Project’s conflict with these policies and ordinances in the Draft Environmental Impact Report, any analysis will be incomplete and contrary to the</p>



		requirements of the California Environmental Quality Act and its Guidelines.
57	3.4 Biological Resources – Question “f”	<p>The Eastbluff Association disagrees with the “no impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact as the Proposed Project will conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conversation Plan, or other approved local, regional, or state habitat conservation plan. CdMHS is located about 1,200 feet from the Upper Newport Bay, portions of which are subject to a State of California habitat conservation plan, Orange County habitat conservation plan, and City of Newport Beach habitat conservation plan. The Proposed Project will foreseeably cause significant light, glare, noise, and pollution to intrude on these protected areas and conflict with the respective habitat conservation plans contrary to the Recirculated Initial Study’s bald assertion otherwise.</p> <p>Absent the inclusion and consideration of the Proposed Project’s effect on these habitat conservation plans in the Draft Environmental Impact Report, any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its Guidelines.</p>
62	3.7 Greenhouse Gas Emissions – Question “a”	The Eastbluff Association agrees with the “potential significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
62	3.7 Greenhouse Gas Emissions – Question “b”	The Eastbluff Association agrees with the “potential significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
63	3.8 Hazards and Hazardous Materials – Question “a”	The Eastbluff Association disagrees with the “less than significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact due to the foreseeable use of hazardous materials during the extensive demolition and construction of the Proposed Project.
63	3.8 Hazards and Hazardous Materials – Question “b”	The Eastbluff Association agrees with the “potential significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
63	3.8 Hazards and Hazardous Materials –	The Eastbluff Association disagrees with the “less than significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental



	Question “c”	impact due to the foreseeable outgassing and emission of the hazardous materials anticipated to be used during the extensive demolition and construction of the Proposed Project.
65	3.8 Hazards and Hazardous Materials – Question “g”	The Eastbluff Association disagrees with the “less than significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact due to the foreseeable significant increase in traffic, congestion, and parking on public streets which is anticipated to materially interfere with and impede emergency ingress and egress to and from the Eastbluff Association through the extremely limited streets providing access to our community. The only means of ingress and egress to and from the Eastbluff Association are Cacao Street off of Eastbluff Drive, Bixia Street off of Eastbluff Drive, Alba Street off of Eastbluff Drive, and Bison Avenue off of Jamboree Road. Accordingly, there are over 100 residences for each of the four means of ingress and egress. The Proposed Project’s location is immediately adjacent to Alba Street, and very close to Bixia Street. Given the inadequate amount of parking on the CdMHS campus, the fact that Alba Street is closer to the Proposed Project’s location than two of the three parking lots on the CdMHS campus, and the fact that there is extremely limited parking on Eastbluff Drive and Visa Del Oro (the two public streets adjacent to the Proposed Project’s location outside of the Eastbluff Association) the Eastbluff Association anticipates that an abundance of attendees of events at the Proposed Project will park on the public streets within the Eastbluff Association, thereby significantly increasing traffic and congestion within our community. This is also anticipated to impair and impede emergency access to our community.
69	3.10 Land Use and Planning – Question “b”	The Eastbluff Association disagrees with the “less than significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact due to vast conflicts between the Proposed Project’s use and physical characteristics and applicable local, county, and state planning and zoning requirements concerning the same, including, in part, that of the City of Newport Beach’s General Plan, Zoning Ordinance, and Municipal Code.
71	3.12 Noise – Question “a”	The Eastbluff Association agrees with the “potential significant impact” finding due to the anticipated exposure of our community, and other members of the public, to noise levels in excess of that permitted by the City of Newport Beach as a result of the Proposed Project and thus requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
71	3.12 Noise – Question “b”	The Eastbluff Association agrees with the “potential significant impact” finding due to the anticipated exposure of our community,



		and other members of the public, to excessive groundborne vibration and noise levels as a result of the Proposed Project and thus requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
71-73	3.12 Noise – Question “c”	<p>The Eastbluff Association agrees with the “potential significant impact” finding due to the anticipated substantial permanent increase in ambient noise levels in the Proposed Project’s vicinity, including that with our community, above existing levels. Accordingly, the Eastbluff Association requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.</p> <p>The Recirculated Initial Study indicates that noise monitoring at certain locations will occur prior to the preparation of the Draft Environmental Impact Report. Only two locations within the Eastbluff Association are proposed to be monitored on Figure 14 and Table 3—those are referenced as “N-4” and “N-8”. Additional locations with the Eastbluff Association must be monitored. As more specifically described in our cover letter and Exhibit “B” thereto, the Eastbluff Association uniquely overlooks the Proposed Project site. Given the change of elevation, topography, and orientation, the residences in the Eastbluff Association will be most affected by the Proposed Project’s anticipated noise generation.</p> <p>All other proposed monitoring locations are either at the same or a lower elevation compared to the Proposed Project and thus are meaningless to understand the foreseeable noise impact the Proposed Project will have on those who will be most affected (that being the Eastbluff Association).</p> <p>The impact on the Eastbluff Association’s residence cannot be sufficiently understood or analyzed using only two baseline noise monitoring locations. As a result, the cumulative effect of noise if the Proposed Project were to be constructed and used cannot be adequately understood and analyzed based on the proposed monitoring locations identified on Figure 14 and Table 3.</p> <p>The Eastbluff Association requests that six additional noise level monitoring locations be added within our community—specifically, we request that locations be added on Aralia Street, Aleppo Street, Arbutus Street, Alta Vista Drive, Bamboo Street, and Blackthorn Street.</p> <p>Absent the inclusion and consideration of additional noise monitoring locations within the Eastbluff Association in the Draft Environmental Impact Report, any analysis will be incomplete and contrary to the requirements of the California Environmental Quality Act and its</p>





		<p>Guidelines.</p> <p>The Eastbluff Association also notes that CdMHS’ last day of school instruction will be June 23, 2016. Accordingly, we trust that the noise monitoring will occur on a weekday during normal school hours before then as the noise monitoring will not be representative and the cumulative noise impact of the Proposed Project cannot be understood and analyzed if such readings are obtained during the weekend when the use of CdMHS’ facilities is known to be the lowest level and/or during the summer recess when again the use of CdMHS’ facilities is known to be the lowest level.</p> <p>The Eastbluff Association further notes that the Recirculated Initial Study is mistaken and misguided in suggesting that the Draft Environmental Report’s consideration of a “good neighbor policy” (particularly a policy so incomplete and minute in scope) as mitigation would satisfy the requirements of the California Environmental Quality Act and its Guidelines. There is no reasonable basis from the Recirculated Initial Study to conclude that a “good neighbor policy” has been defined in detail to substantially reduce the significant environmental impacts of the Proposed Project in terms of noise generation.</p>
72	3.12 Noise – Question “d”	The Eastbluff Association agrees with the “potential significant impact” finding due to a substantial temporary or periodic increase in ambient noise levels in the project vicinity, including our community, above levels existing without the project for the reasons set forth in our comment to 3.12 Noise – Question “c” above and thus requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
76	3.14 Public Services – Question “a”	The Eastbluff Association agrees with the “potential significant impact” finding due to the Proposed Project’s anticipated impact on fire protection services and thus requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact. The Eastbluff Association is particularly concerned that the Proposed Project will interfere and impede with emergency access to and from our community as set forth in our comment to 3.8 Hazards and Hazardous Materials – Question “g” above.
76	3.14 Public Services – Question “b”	The Eastbluff Association agrees with the “potential significant impact” finding due to the Proposed Project’s anticipated impact on police protection services and thus requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact. The Eastbluff Association is particularly concerned that the Proposed Project will interfere and impede emergency access to and from our community as set forth in





		our comment to 3.8 Hazards and Hazardous Materials – Question “g” above.
76	3.14 Public Services – Question “d”	The Eastbluff Association agrees with the “potential significant impact” finding due to the Proposed Project’s anticipated impact on parks and thus requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact. Many of the Eastbluff Association’s members currently use CdMHS’ existing track and field facility and are disappointed that the Proposed Project will not be accessible to members of the public for similar use. This is simply inconsistent with the use of public funds and the Proposed Project being a public facility. It is also violative of any semblance of a “good neighbor policy” given the very significant level of public use of the Proposed Project site by the nearby residents for more than 50 years.
77-78	3.16 Transportation – Question “a”	<p>The Eastbluff Association agrees with the “potential significant impact” finding due to conflicts between the Proposed Project and applicable local, county, and state plans, ordinances, and policies concerning an effective transportation circulation system and thus requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.</p> <p>The Eastbluff Association notes that Eastbluff Drive, which fronts the Proposed Project site, is the primary public transportation route for our community’s residents and visitors. The impact of increased traffic and on-street parking resulting from the Proposed Project must be adequately analyzed and addressed. We anticipate that the Proposed Project will result in a significant slow-down on Eastbluff Drive and other nearby public streets, due to the increased use and increased number of spectators, participants, workers, and school staff at the Proposed Project during events. The impact of the increased use of the sports field with potential simultaneous use of the swim stadium, gym, theater, and other facilities at CdMHS need to be analyzed and addressed.</p> <p>The Eastbluff Association notes that the worst case scenario as discussed in our comment to 1 Introduction – Highest Spectator Events, Worst Case above must be considered and utilized in performing the traffic studies discussed in the Recirculated Initial Study to occur prior to the preparation of the Draft Environmental Impact Report otherwise the cumulative traffic impact of the Proposed Project cannot be adequately understood and analyzed which is necessary to comply with the California Environmental Quality Act’s and its Guidelines’ requirements.</p> <p>The Eastbluff Association further notes that CdMHS’ last day of school instruction will be June 23, 2016. Accordingly, we trust that</p>



		to the extent the School District performs any traffic counts for the traffic analysis stated in the Recirculated Initial Study that those counts will be completed on weekdays of school instruction before June 23, 2016.
78	3.16 Transportation – Question “b”	The Eastbluff Association agrees with the “potential significant impact” finding due to conflicts between the Proposed Project and applicable local, county, and state congestion management programs and thus requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
78-79	3.16 Transportation – Question “d”	The Eastbluff Association agrees with the “potential significant impact” finding due to the foreseeable substantial increase of hazards due to the Proposed Project’s design features and thus requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.
79	3.16 Transportation – Question “e”	The Eastbluff Association agrees with the “potential significant impact” finding due to the Proposed Project foreseeably resulting in inadequate emergency access, including to that of our community, and thus requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact. The Eastbluff Association is particularly concerned that the Proposed Project will interfere and impede emergency access to and from our community as set forth in our comment to 3.8 Hazards and Hazardous Materials – Question “g” above.
79	3.16 Transportation – Question “f”	The Eastbluff Association disagrees with the “less than significant impact” finding and requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact due to conflict between the Proposed Project and local, county, and state adopted policies, plans, and programs regarding public transit, bicycle, and pedestrian facilities, and the Proposed Project will foreseeably decrease the performance or safety of those facilities.
79	3.16 Transportation – Question “g”	<p>The Eastbluff Association agrees with the “potential significant impact” finding due to the Proposed Project foreseeably resulting in inadequate parking capacity and thus requests that the Draft Environmental Impact Report conclude that this constitutes a significant environmental impact.</p> <p>The Eastbluff Association notes that the Recirculated Initial Study’s reliance upon the off-street parking standard for assembly purposes contained in the City of Newport Beach’s Municipal Code is inapt and misplaced. That standard was not intended to apply to high school events. It is foreseeable that at least two thirds of the attendees of the Proposed Project’s events will be high school students. Many</p>



		<p>of those students will drive to and from such events. Virtually all of those students will have a California Driving Permit as opposed to a California Driver's License. Holders of California Driving Permits are subject to certain restrictions and requirements, including that they may not drive friends and fellow students unless they are family members. The off-street parking standards for assembly purposes in the City of Newport Beach's Municipal Code do not contemplate that the end users utilizing the off-street parking spaces will be subject to such restrictions and requirements. Accordingly, a significant number of attendees of events at the Proposed Project will have to lawfully drive separately and cannot lawfully drive other attendees. This significantly increases the foreseeable number of vehicles requiring a parking space versus a three seat to one parking space requirement.</p> <p>The Eastbluff Association further notes that the specious nature of the Recirculated Initial Study's consideration of required parking spaces is demonstrated by the conclusion that "[t]he maximum 1,000-seat bleacher capacity would require 334 spaces." This conclusion spuriously assumes that only 1,000 people would require parking spaces for full-capacity events at the Proposed Project and of course relies on an inapplicable three seat to one parking space ratio. As noted in our comment to 1 Introduction – Highest Spectator Events, Worst Case above, at least 1,500 plus people would require parking spaces and as noted in the preceding paragraph, a three-to-one ratio is inapt.</p> <p>More accurate numbers and ratios must be considered and utilized in analyzing the adequacy of parking capacity in preparing the Draft Environmental Impact Report otherwise this issue will not be adequately understood and analyzed which is necessary to comply with the California Environmental Quality Act's and its Guidelines' requirements.</p> <p>The Eastbluff Association additionally notes that CdMHS already has inadequate parking for students, staff, and visitors. The availability of parking spaces on both CdMHS and adjacent public streets needs to be studied during the school year and anticipate multiple uses of school facilities at the same time to judge the anticipated impact. Similarly, congestion due to incoming and outgoing traffic for events must be analyzed and addressed as it creates a safety hazard for our community.</p> <p>The Eastbluff Association additionally notes that myriad cars are parked on the public residential streets within our community during school hours causing traffic, noise, and lack of parking for residents and their visitors. Permit parking on our community's lower streets adjacent to the schools has been implemented but the volume is so large the cars continue to park on upper streets not under the permit</p>
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		<p>regulations. The failure of the School District to provide adequate parking for the Proposed Project may require the Eastbluff Association to examine gating our community to avoid the foreseeable deleterious impact on our members—note that all of the other homeowner associations nearby the Proposed Project site have private roads and thus can block access to their roads via a security guard, gate or other physical barrier to avoid unpermitted student parking. The impact of increased traffic and increased parking on our community’s public residential streets needs to be adequately analyzed and addressed in the Draft Environmental Impact Report. The foreseeable impacts of the increased parking requirements due to the Proposed Project with simultaneous use of the swim stadium, gym, theater, and other facilities at CdMHS need to be analyzed and addressed in the Draft Environmental Impact Report.</p> <p>The Eastbluff Association additionally notes that the Recirculated Initial Study speciously assumes that attendees of events at the Proposed Project will use CdMHS’ three parking lots as the primary parking locations. This belies experience and logic as attendees will park in the closest available location to the site. Numerous public residential streets in our community are located closer to the Proposed Project site than two of CdMHS’ parking lots. Also, the Recirculated Initial Study erroneously references “Aralia” as a “private street”, whereas it is a public residential street within our community. The Draft Environmental Impact Report should analyze and address the foreseeable impact of attendees of events at the Proposed Project parking on our community’s public residential streets.</p> <p>The Eastbluff Association additionally notes that the Recirculated Initial Study does not acknowledge or contemplate that public parking, and even temporary stopping, on Eastbluff Drive is not allowed across from the Proposed Project site since is a primary route for public transportation, residential and commercial traffic, and public safety vehicles. The Draft Environmental Impact Report should not assume that any attendees of events at the Proposed Project will be able to park and/or be dropped off and picked up on Eastbluff Drive. Given the foreseeable shortage of parking spaces, it is anticipated that these vital traffic limitations will be frequently violated and create public health and safety problems.</p>
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## **EXHIBIT "B"**

### **Eastbluff Homeowners Community Association Corona del Mar High School Sports Field Project Significantly Impacted Homes**

#### **Introduction**

The Recirculated Initial Study has been reviewed by the Eastbluff Association's Board of Directors and by our residents. The information provided in this Exhibit "B" to our public comment letter is based on feedback from our residents at numerous association meetings and workshops, as well as discussions with school officials and NMUSD Trustees.

In particular, the Eastbluff Association recently conducted a written survey of residents to ascertain the level of homeowners' support of and opposition to the Proposed Project. The results of the survey and analysis of our community are presented in this Exhibit to assist the NMUSD staff and consultants in (1) carrying out their statutory duty to mitigate significant environmental impacts on the Eastbluff Association homes and (2) responding to the overwhelming opposition of our residents to the construction of a lighted stadium in the face of the commitment of the School Board to be a "Good Neighbor" in the review of this project.

#### **Overview of Significantly Impacted Homes in the Eastbluff Association**

- Our community contains 460 single family homes.
- Approximately 1,300 people live in our community.
- Our community is the largest and only single family tract in the immediate proximity of the Proposed Project.
- A large number of members of our community have children attending CdMHS.
- Many of our residents are graduates of CdMHS.
- Our community has a long history of support for CdMHS.
- Many of our residents use the CdMHS facilities on a regular basis, including the gym, swim stadium, track, sports fields, and theatre.
- Eastbluff Drive is the primary access to our community. Eastbluff Drive is also the street providing vehicular access to CdMHS.
- There are three entrances to our community from Eastbluff Drive.
- Our community also has a limited entrance from Jamboree Road via Bison Ave.
- Due to (1) the dramatic growth of CdMHS, (2) the fact that the school can be accessed by vehicle only by Eastbluff Drive, (3) the fact that Eastbluff Drive was not designed for the growth which has occurred at the school, (4) the small size of the campus, (5) the lack of a parking structure on campus, and (6) the limited parking available on the campus for the ever increasing school population, the adverse impacts of CdMHS-generated traffic and parking have been visited upon our community as well as other nearby homeowner associations.
- The traffic and parking situation has become so burdensome to our community that the City of Newport Beach has had to repeatedly take action to address those impacts. Those actions are discussed below.



## **Impact Analysis**

Eastbluff Association's homes are directly across Eastbluff Drive from the existing CdMHS track and field. One of the four entrances to our tract is at Alba Street which is directly opposite the entrance to the CdMHS primary student parking lot. That lot is also the main parking lot for the existing track and field, the tennis courts, the gymnasium, and the joint use Marion Bergeson pool.

The intersection of Alba Street and Eastbluff Drive is heavily impacted by school traffic. Past problems with traffic congestion and students parking in front of our homes has led to a series of actions by the City of Newport Beach to reduce the negative impacts on or residents. Those steps were, in part, as follows:

1. At the urging of the Eastbluff Association, the City of Newport Beach installed a right turn only lane from the south end of Eastbluff Drive onto Jamboree Road.
2. The City then reconfigured the Jamboree entrance to our community in order to prevent school traffic from using Bison Avenue to avoid the traffic congestion on Eastbluff Drive.
3. The City then prohibited right turns from Eastbluff Drive onto Alba Street and into our community at certain times on school days.
4. The City then relocated the Eastbluff Drive crosswalk at Alba Street further north on Eastbluff Drive and installed drop-off zones.
5. Most recently, the homes on Aralia Street from 2100 to 2344 (51 homes) have been designated as Parking Permit District 3. School parking is prohibited for more than one hour on school days. Residents are required to have parking permits to park more than one hour. This limitation was designed to stop student parking all day on these residential streets due to lack of parking at the school.

All of these steps were necessary to begin alleviating the problems caused by the extraordinary, unplanned growth of CdMHS and the failure of the NMUSD to adequately address the problems this growth has visited upon the surrounding neighborhood. Please also note that the solutions available to the City of Newport Beach to address the CdMHS traffic and parking problems are not imposed upon CdMHS, which is the source of these problems, but are, instead, imposed upon the neighbors who have had absolutely no role in creating the existing school traffic and parking problems.

As to the recently imposed Aralia Street parking restrictions, they do not apply after 4:00 pm on school days and only apply to Aralia Street. This has resulted in serious parking problems when school events take place after 4:00 pm and on non-school days. Event participants monopolize the residents' parking on Aralia Street. In addition, students who are not permitted to park in the school lots at CdMHS now are willing to drive further up into the streets in our association in order to find parking. Students are now parking on Aleppo Street, Alta Vista Drive, and Arbutus Street.

In light of the fact that NMUSD has offered us no solution to our existing parking issues, our residents have recently asked the Eastbluff Association to take action with the City to expand the no parking without a permit zone to all streets in the high impact area described later in this report. They have also asked to extend the no parking days and hours to seven days a week from 7:00 am to 10:00 pm.





Due entirely to CdMHS-generated traffic and parking problems, some of our homeowners are now promoting the strategy to privatize the streets in our association. Privatizing would, of course, be a significant capital and ongoing expense for the residents, all of which would be endured only to avoid the burdens unfairly placed on our homeowners by NMUSD.

The following chart presents the streets faced with the most serious anticipated environmental impacts due to the proposed project:

Street	Addresses	No. Homes	Environmental Impact Categories					Notes
			Traffic	Parking	Noise	80' Lights	View (poles)	
Aralia St	2100 - 2344	51	S	S	S	S	S	1
Arbutus St	2100 - 2344	33	S	M	S	S	S	2
Alta Vista Dr	2208 - 2401	20	S	S	S	S	S	2
Aleppo St	736 - 927	20	S	S	S	M	M	3
Almond St	901 - 916	5	S	N/A	S	N/A	N/A	4
Alder St	901-920	9	S	N/A	S	N/A	N/A	4
Bellis St	701-938	22	S	M	S	M	M	5
<b>TOTAL HOMES</b>		160						

Legend - S = Significant Negative Impact; M = Moderate Negative impact; ; N/A = Not Applicable

Notes:

1. Aralia Street homes are significantly impacted due to existing school parking. Additional environmental impacts will occur due to significantly increased traffic, noise, lights, and lack of parking from the proposed stadium and allowing expanded use. The existing no parking on this street is likely to be expanded to 7 days a week and 7:00 am to 10:00 pm if the proposed event schedule and size of the events is not modified. These homeowners' entrance/exit is from Alba Street and they have a significant inconvenience when school day and evening events take place.
2. Event participant and attendee parking, noise from large events, and impairment of views are the primary environmental impacts on homes on Arbutus Street and Alta Vista Drive. The parking restrictions in place on Aralia Street are likely to be expanded to Arbutus Street, Aleppo Street, and Alta Vista Drive homes. All residents will be significantly negatively impacted by increased traffic and congestion.





3. The significant environmental impacts on Aleppo Street will be due to event parking and noise. This is also a street currently used for access to the school from the Bison and Jamboree entrance. The increased through traffic is a safety hazard for child and our walkers and joggers. Some of these homes will also be impacted by view impairment from 80 foot light poles and lights for evening practices/training and events. All residents will be significantly negatively impacted by increased traffic and congestion.

4. The significant environmental impact on Alder Street and Almond Street (14 homes) is largely due to noise that carries up the terraced tract from the schools to their location in cul-de-sacs. The noise intensifies and seems to create a tunnel effect against the homes and sound wall on Jamboree. All residents will be significantly negatively impacted by increased traffic and congestion.

5. The significant environmental impacts on Bellis Street will be primarily due to noise and view impairment. This is also a street used for access to the school from the Bison and Jamboree entrance. The increased thru traffic is a safety hazard for children and our walkers and joggers. All residents will be significantly negatively impacted by increased traffic and congestion.

The map included in this report was obtained from Google Maps. The link is:  
<https://www.google.com/maps/@33.6335938,-117.8740085,17z>

### **Homeowners' Survey Results**

The survey of our homeowners was taken when the Recirculated Initial Study was released and public comments requested. The link to the Recirculated Initial Study was provided and relevant excerpts from such were provided, summarizing the proposed expanded use of the facilities in terms of number of sports, day and hours of use and planned events. A presentation has been made at our monthly association meeting and followup took place through web site posting, email, and direct mail.

The survey results confirm the homeowners' willingness to support the Track and Field Replacement to provide a cost-effective environment to maintain safer field conditions. We also support the all-weather capability these changes will provide.

Significant concern is evidenced by 70% of respondents expressing "Extreme" concerns about scope of the proposed project. Our members noted their concern about negative impacts that will result due to event noise, lights, lack of parking, increased traffic congestion and number of events, day/time of the field use, and the potential to rent the facility for outside use.

Many members noted existing problems from CdMHS parking lot lights in the main parking lot on Eastbluff Drive and the noise from the swim stadium. A number of responses also noted the current student parking problem on community's "A" streets across from the school's main parking lot. More events and large attendance would make this problem even worse.

Concern was also expressed that other HOA's in Eastbluff could prohibit on-street parking on their private streets and that would push attendees to stadium events to park on Eastbluff Community's public residential streets. Parking is not permitted on Eastbluff Drive due to main access in and out of community and its use by public transportation and bikers.



Survey responses were 70% to 75% expressing “Rating Category 5 – “extremely concerned about a Potentially Significant Impact.” Additionally 10% to 15% of members expressed “Category 4 - Moderately concerned about a Potentially Significant impact.” This level of concern needs to be addressed in the EIR and final design plans.

The survey questions and responses are included in this report. The following summary points out where support and where strong opposition exist.

<b>Question</b>	<b>Significant/Moderate Negative Impact %</b>	<b>Somewhat/Slight/Not Concerned %</b>
Q1: Aesthetics, views, landscaping, visual appeal	84.2	15.8
Q2: Lights, glare	84.2	15.8
Q3: Noise impact from events	83.6	16.4
Q4: Ambient noise, permanent increased use	82.0	18.0
Q5: Negative impact on HOA property from use, trash, maintenance, upkeep	56.8	43.2
Q6: Transportation Issues – congestion, busier intersection, curbside parking	88.3	11.7
Q7: Hazardous interchange, entrance U-turns, pedestrian safety	88.0	14.0
Q8: Transportation – emergency vehicle access	68.2	32.8
Q9: Parking capacity inadequacy at HS during games and events	80.6	19.4

Comments received indicated homeowners were in support of the field improvements to replace natural grass and existing track materials with all weather artificial turf and track compound. The level of support for other key elements of the project was in the low range of 7% to 21% as shown below.

<b>Sports Field Element</b>	<b>Members</b>	<b>%</b>
Field and Track Surface Replacement	108	63.2
Concession / ticket booth, restrooms	36	21.1
Bleachers 1,000 seats	35	20.5



Press box	22	12.9
Lighting	15	8.8
Public Address	16	9.4
Increase use outside events	12	7.0

### **Recommendation**

NMUSD officials should consider our feedback and realize that the community around the school will suffer significant negative environmental impacts if the stadium is approved, constructed, and used. Meetings should be scheduled with our representatives to discuss alternatives to the Proposed Plan. This is consistent with pledges we have received from School Board Trustees. Not engaging in such talks will delay the Track and Field Reconstruction and cost our association and the School District unnecessary consultant and legal expenses.

### **Conclusion**

The Eastbluff Association has been active for two years in discussing this project with NMUSD and has consistently objected to the construction of a lighted stadium at CdMHS. The proposed plan and the operation use and schedule will have a significant negative impact on our homes. We are mobilized and knowledgeable about the proposed improvements. Our homes need to be a key location in measuring the impact and negotiating changes in the plans and mitigation measures. We are adamant that the proposed stadium will further unfairly burden our residents with traffic congestion, lack of parking, event noise, and view impairment from light poles and lights.

Our Eastbluff Homeowners Community Association has designated two Board Directors and our Land Use/Litigation attorney as the points of contact for questions on our comment letter and future discussions. We encourage NMUSD and CdMHS officials to meet with our representatives to discuss strategies to resolve the significant negative environmental impacts the Stadium will cause as proposed in the Recirculated Study.

Our contacts are as follows;

- Don Slaughter – [Don@eastbluff.net](mailto:Don@eastbluff.net) – (949) 644-1455
- Ron Rubino – [Ron@eastbluff.net](mailto:Ron@eastbluff.net) – (949) 683-6130
- Aaron Ehrlich – [AEhrlich@berding-weil.com](mailto:AEhrlich@berding-weil.com) – (714) 429-0600

