



VIA HAND DELIVERY AND EMAIL (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.

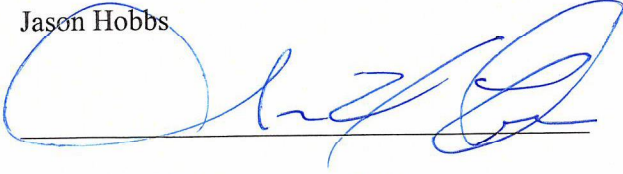
Respectfully submitted,

(signature page follows)

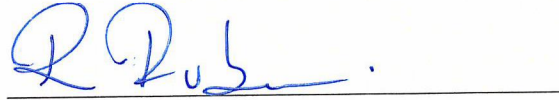


The Eastbluff Community Homeowners Association
Board of Directors

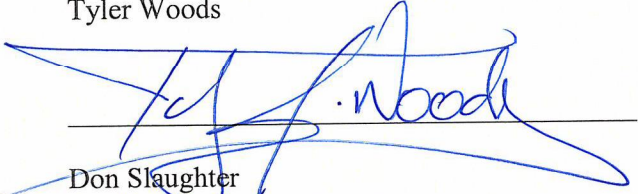
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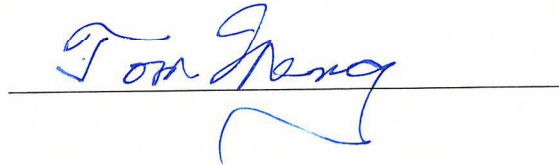
Ron Rubino



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
TOTAL HOMES		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.

Question	Significant/Moderate Negative Impact %	Somewhat/Slight/Not Concerned %
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.

Sports Field Element	Members	%
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 – (949) 644-1455
- Ron Rubino – Ron@eastbluff.net – (949) 683-6130
- Aaron Ehrlich – AEhrlich@berding-weil.com – (714) 429-0600

