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Appendix A: Draft EIR Comment Letters

## **SECTION 1.0 INTRODUCTION**

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This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (Final EIR) for the Los Altos High School Lights and Public Address System Project.

### **1.1 PURPOSE OF THE FINAL EIR**

In conformance with the California Environmental Quality Act (CEQA) and CEQA Guidelines, this Final EIR provides objective information regarding the environmental consequences of the proposed project. The Final EIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The Final EIR is intended to be used by the Mountain View Los Altos High School District (District) in making decisions regarding the project.

Pursuant to CEQA Guidelines Section 15090(a), prior to approving a project, the lead agency shall certify that:

- (1) The Final EIR has been completed in compliance with CEQA;
- (2) The Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and
- (3) The Final EIR reflects the lead agency's independent judgment and analysis.

### **1.2 CONTENTS OF THE FINAL EIR**

CEQA Guidelines Section 15132 specify that the Final EIR shall consist of:

- a) The Draft EIR or a revision of the Draft;
- b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
- c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
- d) The Lead Agency's responses to significant environmental points raised in the review and consultation process; and
- e) Any other information added by the Lead Agency.

### **1.3 PUBLIC REVIEW**

In accordance with CEQA and the CEQA Guidelines (Public Resources Code Section 21092.5[a] and CEQA Guidelines Section 15088[b]), the City shall provide a written response to a public agency on comments made by that public agency at least 10 days prior to certifying the EIR. The Final EIR is also available for review on the District's website:

<https://www.mvla.net/Departments/Business-Services/Facilities/Stadium-Lights-Project/CEQA-Documents/index.html>. Usually hard copies would be available for public review at 1299 Bryant Avenue, Mountain View, California 94040 on weekdays during normal business hours. Due to the current situation under the coronavirus related Shelter-in-Place policy, this location is closed to the public. Therefore, if requested, a hard copy will be mailed to you. Please allow time for printing and delivery.

## **SECTION 2.0     DRAFT EIR PUBLIC REVIEW SUMMARY**

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The Draft EIR for the Los Altos High School Lights and Public Address System project, dated April 2020, was circulated to affected public agencies and interested parties for a 45-day review period from April 17, 2020 through June 1, 2020. The District undertook the following actions to inform the public of the availability of the Draft EIR:

- Notification of the availability of the Draft EIR was mailed to project-area residents (within 300 feet radius) and other members of the public who had indicated interest in the project;
- The Draft EIR was delivered to the State Clearinghouse on April 17, 2020, as well as sent to various governmental agencies, organizations, businesses, and individuals (see Section 3.0 for a list of agencies, organizations, businesses, and individuals that received the Draft EIR); and
- Copies of the Draft EIR were made available on the District’s website (<https://www.mvla.net/Departments/Business-Services/Facilities/Stadium-Lights-Project/CEQA-Documents/index.html>). Due to current situation under the coronavirus related Shelter-in-Place policy, the District’s office and School’s administration office were closed to the public. Therefore, a hard copy was mailed to the interested parties.

## **SECTION 3.0     DRAFT EIR RECIPIENTS**

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CEQA Guidelines Section 15086 requires that a local lead agency consult with and request comments on the Draft EIR prepared for a project of this type from responsible agencies (government agencies that must approve or permit some aspect of the project), trustee agencies for resources affected by the project, adjacent cities and counties, and transportation planning agencies.

The NOA for the Draft EIR was sent to owners and occupants adjacent to the project site and to adjacent jurisdictions like Santa Clara County Department of Planning and Development, City of Mountain View and City of Los Altos. The following agencies received a copy of the Draft EIR from the District or via the State Clearinghouse:

- California Air Resources Board
- California Department of Conservation
- California Department of Education
- California Department of Fish and Wildlife, Bay Delta Region 3
- California Department of Forestry and Fire Protection
- California Department of Parks and Recreation
- California Department of Transportation District 4
- California Department of Water Resources
- California Highway Patrol
- California Native American Heritage Commission
- California Natural Resources Agency
- California Regional Water Quality Control Board, San Francisco Bay Region 2
- California State Lands Commission
- Department of General Services
- Department of Toxic Substances Control
- Office of Public School Construction
- San Francisco Bay Conservation and Development Commission
- San Francisco Bay Regional Water Quality Control Board
- State Water Resources Control Board, Division of Drinking Water
- Division of the State Architect

## **SECTION 4.0      RESPONSES TO DRAFT EIR COMMENTS**

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In accordance with CEQA Guidelines Section 15088, this document includes written responses to comments received by the District on the Draft EIR.

Comments are organized under headings containing the source of the letter and its date. The specific comments from each of the letters and/or emails are presented with each response to that specific comment directly following. Copies of the letters and emails received by the District are included in their entirety in Appendix A of this document. Comments received on the Draft EIR are listed below.

<b><u>Comment Letter and Commenter</u></b>	<b><u>Page of Response</u></b>
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## ORGANIZATIONS, BUSINESSES, AND INDIVIDUALS

### A. Stephen Friedman, on behalf of the Committee for Tree-Lined Streets (dated May 29, 2020)

**Comment A.1:** In anticipation of the greatest change to our neighborhood in more than 50 years, we respectfully request improvements that benefit all parties associated with our largest neighbor – Los Altos High School students/staff, area residents and the MVLA High School District.

As you may recall, at meetings hosted by the District on October 16, 2018 and February 10, 2020 we stated in the public comment period (with you presiding) that as part of the construction project, MVLA School District consider planting trees along the north side of Los Altos High School property (bordering Jardin Drive). Currently, a barren strip with irrigation piping from the School's on-site water wells, occupies the space between the tennis courts, sports field and Jardin Drive.

We hope to hear soon of the District's plans to move ahead with this request. Representatives of our Committee, Tree-Lined Streets, are willing to assist the District in tree species selection, placement and acquisition of suitable trees.

In discussions with neighborhood residents, we have also learned of a preference to improve this same space by removing the opaque (and ragged) netting hanging on the tennis courts' chain link fences. We suggest that you either leave the fence open (do we really need a wind break that darkens the space and requires replacement every few years?). Or, if the wind break and its ongoing expense is deemed a necessity by the District, we request that it be of a transparent material.

In consideration of our request, please try to understand that the rear of the high school is the center of our residential neighborhood. Surely the District Board can agree that sensible landscaping (shaded streets and sidewalks), on par with the front of Los Altos High School, is an appropriate request and a genuine improvement at little cost. We ask that the District communicate its intentions to us and the community publicly.

**Response A.1:** The comment recommends landscaping ideas along the north side of Los Altos High School property (bordering Jardin Drive) and removal of netting on the tennis courts' chain link fences. The tennis courts and landscaping along Jardin Drive are out of the scope of the project's EIR which analyzed environmental effects resulting from the installation and operation of field lights and PA system at LAHS. Therefore, further response is not warranted. The District will consider the requested landscaping and screening improvements and communicate with the community outside of the sports lighting EIR process, as they are unrelated

**B. Dave Schott (dated May 31, 2020)**

**Comment B.1:** Paragraph 2.2 on Page 3:

There is no discussion of the need for the project. The high school has functioned without the need or expenditure for field lights for over 65 years including having won a number of varsity football championships. A full explanation of the sudden need for lighting and [loud] speakers should be provided which justifies such a need and the rationale for creating what will be an inconvenience and disturbance of the peace for neighboring residences.

Note: Use of the Foothill College alternate solution eliminates all issues regarding noise, parking and lights and most of the concerns regarding traffic congestion. Please provide a cost benefit comparison of the Foothill College use to that of the cost benefit of adding lights and speakers to the Los Altos High School field.

Please include a discussion of the cumulative effects of noise, lights, traffic congestion, parking and potential for unsafe behaviors in the neighborhood around Los Altos High School on game nights.

**Response B.1:** The DEIR included a set of objectives, as listed in Section 2.3 on pages 10-11, pursuant to CEQA Guidelines Section 15124. Objectives of the project include the ability of the high school to host sports events and games at their stadium, provide athlete and spectator safety by providing superior lighting conditions during sports events and games at night, provide an upgraded PA system that focuses and contains sound within the stadium area, and provide outdoor athletic facilities for outdoor night sport events that are consistent with typical high school facilities throughout Santa Clara County and the San Francisco Bay Area. As stated in the DEIR, distributed sound systems are equivalent or superior to a single- or dual-speaker system when considering potential community noise impacts. The project would replace the existing speaker system (consisting of three speakers located at the press box) with a distributed sound system, which would allow for greater control of system noise levels.

Project objectives are used to develop a reasonable range of alternatives to inform decision makers when making findings regarding a project. The Location Alternative in Section 7.2.2.1 of the DEIR discussed potentially locating nighttime games at Foothill College as opposed to LAHS campus. This option was evaluated for its potential to reduce the environmental effects of the proposed lighting and PA system project while meeting the objectives of the project. In considering an alternative location in an EIR, the CEQA Guidelines advise that the key question is “whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location.” While locating games at Foothill College may reduce noise and congestion in the vicinity of LAHS, these effects would not be eliminated but would be relocated to a different area. There are residences to the south of the Foothill College track and field which could be affected by the addition of noise, light spillover, and traffic congestion. In addition, none of these effects were identified as significant in the LAHS DEIR. Thus, the environmental effects of the project were not found to be substantially lessened by relocating the project.

Furthermore, an alternative location such as Foothill College would not allow for several of the project objectives to be met, including providing LAHS the capability to host nighttime sporting events, games, and practices on campus. Cost-benefit analysis of the Foothill College use and comparison to the cost benefit of adding lights and speakers to the Los Altos High School field is out of scope of CEQA, which is focused on the environmental effects of physical changes to the environment.

The cumulative effects of the impact areas mentioned in the comment above are described in each section of the DEIR, immediately following the discussion of project-specific impacts. Parking and public safety issues are not an impact under CEQA nor are they subject to environmental review.

**Comment B.2:** Trip Generation beginning on Page 129.

It is not accurate to use Archbishop Mitty High School [as] a reference for comparable traffic activities at Los Altos High School. Archbishop Mitty High School is a private Catholic High School where many of those attending commute some distance and are not local residents. Students at Los Altos High School are all local to the school district and there are virtually no commuters. Those driving to games at Mitty may have a greater necessity for carpooling while many at Los Altos may not.

In addition, most schools in the Santa Clara Valley Athletic League are south of Los Altos. Students driving from other schools to attend games in Los Altos will need to traverse through the town local streets from Highway 280 or other locations to attend games at Los Altos High School. Congestion caused in these travel corridors to the school have not been addressed.

The EIR Trip Generation Study cannot be considered reliable by using Mitty High criteria and ignoring the travel through Town by the students from other schools. The Trip Generation should be revised based on a Los Altos High School game, not Mitty High which is not representative and also should include the effects of added traffic traveling through town from other schools at night.

**Response B.2:** The transportation impact analysis prepared for the project focused on the potential impacts resulting from the highest attended sporting events (rivalry/homecoming football games with approximately 2,200 attendees) which would occur with the project. As noted in the comment above, the project trip estimates were calculated based on average vehicle occupancy rates for a homecoming football game at Archbishop Mitty High School. As explained in the DEIR, because there are no standard trip generation rates included in the Institute of Transportation Engineers (ITE) Trip Generation Manual for the proposed project, trip generation rates were estimated based on attendance/parking rates for a high school homecoming football game in the area which was hosted with portable lights. At the time of preparation of the traffic study, homecoming football games at MVHS and LAHS had already occurred and therefore could not be observed; thus, existing data from another high school homecoming football game in the area was used. The vehicle occupancy rate of 3.24 persons per vehicle was used to calculate the number of vehicle trips which would occur following the most highly attended sporting



events on LAHS campus. While it is acknowledged that Archbishop Mitty High School is a private high school with different attendance boundaries than LAHS, it is reasonable to assume that attendees of nighttime sporting events at LAHS would also carpool because sports games are social events which families, students, and fans frequently attend together. Further, the analysis in the DEIR assumes that all 2,200 attendees arrive by vehicle, which may not be the case due to the proximity of residential neighborhoods to the campus.

The transportation impact analysis estimated the project's effects on local roadways using a three-step process: 1) trip generation, (2) trip distribution, and (3) trip assignment. In determining project trip generation, the traffic related to the proposed field light installation at LAHS was estimated for the PM peak hour, using average vehicle occupancy rates as described above. For trip distribution, an estimate is made of the directions to and from which the trips would travel, based on existing travel patterns on the surrounding network and the locations of complementary land uses. In project trip assignment, the project trips are assigned to specific streets and intersections, based on the trip distribution pattern and potential parking locations. Using this methodology, the project's effects on the roadway network were analyzed at five intersections in the site's vicinity. Students traveling from other schools are included in the overall trip generation numbers. Based on the significance criteria described in the DEIR, adverse traffic effects would not occur at any of the five study intersections. It should also be noted that the transportation impact analysis is conservative in the fact that it analyzes traffic conditions against the City of Los Altos level of service standards for PM peak-hour traffic (5:00 to 6:00 PM) even though the majority of project trips would occur outside of the PM peak-hour.

**Comment B.3:** The last sentence in the 3<sup>rd</sup> Paragraph on Page 132 is not correct:

The sentence that indicates use of the Los Altos High School football field instead of the Foothill Campus field will make shorter trips and reduce overall VMT is not true when considering those who are attending the game from the opponent's school district. Almost half of those attending games may be from schools outside of Los Altos and south of town. The most convenient route is Highway 280 which exits at El Monte Avenue adjacent to Foothill College. Their travel time and added traffic congestion on the local streets in Los Altos is totally eliminated when the Foothill College venue is used. In addition, many Los Altos students live much closer to Foothill College than Los Altos High School, especially those in Los Altos Hills and those who live west of Foothill Expressway. And others have an equal travel distance to either location. Please provide a correct and more detailed evaluation of VMT during use of the Foothill College field versus that at Los Altos High. What is stated in the EIR is not correct.

**Response B.3:** The project's VMT was evaluated according to the Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA. According to the technical advisory, land use projects that generate or attract fewer than 110 trips per day can be assumed to have a less than significant transportation impact under CEQA. Depending on the sporting season, the project would increase daily trips by an estimated 74 to 87 trips, as stated on page 132 of the DEIR. Thus, it was concluded that the project would result in a less than

significant VMT impact. The VMT conclusion is based on the average daily trips less than 110 trips per day, and not based on the trip length. The Foothill College alternative would also have the same amount of increase in attendees and games/events as the proposed project, and the impact should be the same because the VMT analysis is based on number of trips. The comment does not affect the VMT conclusion.

To clarify this conclusion, a statement has been omitted from the DEIR and Appendix E – Traffic Report, as shown in Section 5.0 Draft EIR Text Revisions.

**Comment B.4:** Paragraph 7.2.2.1 Location Alternative.

This paragraph makes a very, very inaccurate assessment with regard to the use of the Foothill College football field as an alternate location. The statement that use of the Foothill College football field would lead to greater impacts on vehicle travel and noise exposure is untrue. In fact, the opposite is true. At Foothill college almost all traffic generated on local streets by those coming from other schools will be mostly eliminated. The assessment does [not] even mention this fact. As noted above, all traffic coming from schools south of Los Altos can access the Foothill College field directly without the use of Los Altos or Los Altos Hills local streets. Further, the disturbance of peace in the residential neighborhoods surrounding Los Altos High School would not only be mitigated, it would be mostly eliminated. The Foothill College field does not have nearby or adjacent residential homes that would be disturbed by game noise, bands or traffic. It does not require that parking for games be accommodated on many surrounding residential streets because ample parking is available at the college on existing parking lots. Please correct this discussion.

**Response B.4:** The option of using Foothill College to host all LAHS sporting events was considered by the District and is discussed in the DEIR in Section 7.2.2.1 Location Alternative. As described in Response C.1, the CEQA Guidelines advise that the key question is “whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location.” While locating games at Foothill College may reduce noise and congestion in the vicinity of LAHS, these effects would not be eliminated but would be relocated to a different area. There are residences to the south of the Foothill College track and field which could be affected by the addition of noise, light spillover, and traffic congestion. In addition, none of these effects were identified as significant in the LAHS DEIR. Thus, the environmental effects of the project were not found to be substantially lessened by relocating the project. Furthermore, an alternative location such as Foothill College would not allow for several of the project objectives to be met, including providing LAHS the capability to host nighttime sporting events, games, and practices on campus.

The statement in the DEIR that the Foothill College location would lead to greater impacts associated with increased vehicular travel and noise exposure is relative to the baseline conditions in that area. The Foothill College alternative would reduce potential environmental impacts in the vicinity of LAHS but would lead to greater impacts in the vicinity of Foothill College. Parking availability is not considered an environmental impact under CEQA, unless lack of parking would require additional

facilities to be constructed or other improvements to be made which could have adverse environmental effects (*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002)). The project does not include any parking areas and existing facilities would serve the parking demand created by the project.

**Comment B.5:** Cumulative Negative Effects have not been Addressed

The EIR seems to indicate that the negative effects of noise, light pollution, traffic, and on-street overflow parking individually are below thresholds of tolerance. However, an assessment of the effects taken as a whole on the current environment and desirability of the adjacent residential neighborhood are not addressed. Please provide an assessment of the degrading effects on the much valued current neighborhood environment when considering the differences between the quiet, peaceful evenings that currently [exist] to the changed conditions caused by the project's combined effects of [loud] speakers, new game noise, new traffic and new congestion, new light pollution and new street overflow parking on the surrounding neighborhood.

**Response B.5:** The DEIR included a discussion of cumulative effects of each impact area, immediately following the discussion of project-specific impacts. For example, the cumulative aesthetic impacts of the project are described in Section 3.1.2.2 Cumulative Impacts on page 36, following the discussion of project impacts beginning on page 21. Each impact area has specific significance criteria which are used to determine the project's impact. Based on these criteria, the DEIR concluded that the project would not result in any significant and unavoidable project-level or cumulative environmental impacts.

**Comment B.6:** The 2 million fund source and comparison cost to benefit for the use of the funds that alternately could be used to assist students in need of equipment for remote learning or faculty needs for housing locally should be addressed.

- 1) Please describe the project funding source and if it is publicly approved funding.
- 2) Are the funds for this project being provided for their highest and best use? Could these funds be better used to assist students in need of internet and home computers for remote learning requirements. Please provide an evaluation of this alternative use.
- 3) Could the funds provide additional contributions to the new housing project being promoted by the County that is to provide low cost nearby housing in South Palo Alto for faculty. Please provide an evaluation of this alternative use.

**Response B.6:** As described in Response C.1, the subject of the DEIR was the environmental effects resulting from the installation and operation of field lights and a PA system at LAHS. A description of funding mechanisms and/or cost-benefit analysis is not required under CEQA and is not the purpose of the DEIR. An EIR is primarily an informational document used to inform decision makers of the environmental effects of a project. A discussion of the alternate use of funds would be outside of the scope of the DEIR.

**Comment B.7:** Not all neighbors adjacent to the school have received Notification of the Draft EIR.

Please make sure all nearby residents entitled to make comments have received notice of the availability of the Draft EIR and have been notified of the comment and response period. We know of neighbors immediately adjacent to the school who have not received notification.

**Response B.7:** The DEIR was circulated to affected public agencies and interested parties for a 45-day review period from April 17, 2020 through June 1, 2020. The Draft EIR and documents referenced in the Draft EIR were available for review online at the District's website at <https://www.mvla.net/Departments/Business-Services/Facilities/Stadium-Lights-Project/index.html>. Usually hard copies would be available at the District's office and LAHS School's Administration office: Due to the current situation under the coronavirus related Shelter-in-Place policy, these locations were closed to the public. Therefore, a hard copy was mailed to interested parties.

The District also mailed notification of the availability of the Draft EIR to project-area residents (within 300 feet radius of the school) and other members of the public who had indicated interest in the project.

**C. Mac McConnell, on behalf of MVLA Neighborhood Cares (dated May 31, 2020)**

**Comment C.1:** Our neighborhood organization, MVLA Neighborhood Cares, has reviewed each of the Draft Environmental Impact Reports for LAHS and MVHS. We note with appreciation that the Draft EIR adopted the suggested minor changes we offered in our response to the previous *Notice of Preparation of Draft Environmental Impact Report*, and we appreciate this attention to detail.

However, we do have comments on these drafts and their implied impacts on the neighborhood environmental contexts, for each of the schools, that we think are important. Our remarks are presented separately by school.

**LAHS DEIR Response**

LAHS DEIR – page numbers refer to document page number when opened in Adobe Acrobat.

- Pp. 1-170, the EIR body
- Pp. 171-208, Appendix A, comment letters from neighbors and agencies
- Pp. 209-221, Appendix B, photometric (field lights) measurements, Musco.
- Pp. 222-300, Appendix C, March 2014 field upgrade geotechnical and hazard investigation, Cleary Consultants, Inc.
- Pp. 301-312, Appendix C December 2019 drilling recommendations for light poles, Cleary Consultants, Inc.
- Pp. 313-364, Appendix D, April 2020 noise report by Illingworth & Rodkin, Inc.
- Pp. 365-395, Appendix E, April 2020 traffic report by Hexagon/David J. Powers & Associates, Inc.
- Pp. 396-424, LAHS Field Lighting Project TIA Technical Appendices.

Please consider the following:

P. 19 (EIR p. 10) Public Address System: *“The proposed project includes installation of an upgraded PA system consisting of up to 12 pole-mounted speakers on 10 poles (two poles out of the 10 would have two speakers mounted to them), at 12 to 18 feet in height, located on the east and west sides of the field (Figure 2.2-4).*

**Comment:** Later in the document, pp. 308-312 (EIR Cleary Consultants, Inc. Drilled Pier Foundation Recommendations), there are extensive specifications for how the Musco field light poles will be drilled, footed and installed, but there are no such specifications for the speaker poles which are part of this project.

**Requested Revision:** None, based on RGM Kramer’s verbal assurance to us that the State of California Architect Board treats these poles similarly to flag poles, and does not require drilling and siting specifications as part of this EIR. If this is not the case, we ask the District to so notify us before submitting the final EIR.

**Response C.1:** The organization provides introductory comments and states that their comment regarding speaker poles specifications was satisfactorily addressed by RGM Kramer. If anything changes, the District will notify MVLA Neighborhood Cares organization.

**Comment C.2:** P. 56 (EIR p. 47, 3.3.2.2): Cumulative Impacts: *“Operation of the proposed stadium lights and PA system would not generate new sources of emissions. Construction of the proposed project would generate diesel emissions and dust. However, construction activities would be temporary and required to comply with state and local regulations and implement the mitigation measures described above.”*

**Comment:** Since LAHS night games have always been played at other fields, there would indeed be an increased generation of new sources of emissions in the project operation phase. As previously stated in the MVHS review section above, neighbors of both schools are familiar with the fact that visitor team buses are often left idling for long periods of time while games are in progress. This occurs perhaps so drivers can stay warm, but it is to the detriment of nearby sensitive receptors. The resulting impact on nearby neighbors is a noxious level of diesel exhaust in the air, sometimes lasting for as long as the athletic competition goes on. Please reference this language on p. 51 (EIR p. 42) of the EIR: *“Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. Diesel exhaust is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (most susceptible to injury). Chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the California Air Resources Board (CARB).”* Please refer back to the construction phase mitigation plan with regard to this problem, on p. 6 (EIR p. v, Impact AIR 3.1). *“Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]).”*

**Requested revision:** We request that the District add a similar diesel bus idling mitigation statement during athletic events, under the Project Operation section MM AIR-2.1, pp. 55-56 (EIR pp. 46-7), or where appropriate. Doing so will also bring the District into alignment with the City of Los Altos’s anti-idling campaign. Although Los Altos does not have an anti-idling ordinance, it is well aware of the problem, as can be seen here: <https://www.facebook.com/CityOfLosAltos/photos/the-city-has-implemented-a-new-anti-idling-campaign-focused-on-vehicles-using-ci/983138585202304/>. For example, at Shoup Park there is signage in the parking lot instructing vehicle operators to turn off the ignition. Thus, diesel bus idling mitigation would be consistent with official Los Altos policy, which is one step away from an ordinance.

**Response C.2:** As described in the comment and in the DEIR, diesel exhaust is of concern due to its linkage to health risks in the San Francisco Bay Area. The Bay Area Air Quality Management District (BAAQMD) considers substantial sources of TACs to be roadways with greater than 10,000 vehicle trips per day and stationary sources such as diesel generators. The project does not include any substantial sources of TACs which would exceed BAAQMD health risk thresholds; as such, no mitigation for operational health risk impacts was identified in the DEIR.

The DEIR evaluated the air quality impacts of the project with respect to the baseline conditions. Under baseline conditions, sporting events are hosted on- and off-campus, and visiting athletic teams are transported to and from the track and stadium in team

buses. The number of sporting events on campus would increase under the proposed project, as the one or two games per year which are hosted off-site at Foothill College would be hosted on the LAHS campus. As described on page 45 of the DEIR, the operational activities proposed by the project would result in incremental increases in emissions due to the addition of nighttime football games. All other events (aside from football) currently occur during daytime hours on-campus and would be shifted to the evening hours. Thus, the project would result in a minor increase in diesel exhaust emissions beyond baseline conditions due to additional team buses transporting players and coaches to and from the site and/or generating exhaust emissions by idling. However, this increase in emissions would only occur during sporting events and would not amount to a substantial long-term increase in emissions. The net increase in emissions from potential bus idling would be limited to the team buses parking on-site for an additional one to two football games. All other sporting events hosted on-campus require team bus transport to and from the area. Further, the DEIR notes that some existing emissions would be offset by eliminating the need for team travel to Foothill College, which is approximately two miles away from LAHS (page 46). Team buses parking and idling would be subject to compliance with any formal idling ordinance adopted by the City of Los Altos, at the time it is adopted and as applicable to the proposed uses under the project.

**Comment C.3:** P. 108 (EIR p. 99) Community Impact: *“Marching band directors shall take reasonable steps to minimize the impact of sound on the surrounding neighborhoods during practice sessions. The District shall have minor alterations made to practice areas as necessary to facilitate the implementation of these steps.*

**Comment:** During the Workgroup meetings that preceded the Board’s new final policy adoptions in June of 2019, the LAHS Band Director expressed a wish that a gate and mobile ramp be installed at the north fence between the track and the baseball field. Even when the new lights and sound are installed on the existing field, the Director prefers to practice on the outfield of the baseball field. This was discussed in a meeting with the LAHS Principal and MVLA Neighborhood Cares representative from north Los Altos. Continuing band practice on the baseball outfield would mitigate sound impact on the LAHS east neighbors and would reduce student instrument transportation time each practice day by 40 minutes.

**Requested revision:** MVLA Neighborhood Cares asks that the Board and the District and LAHS Administration contract to have this inexpensive gate and mobile ramp solution implemented, for the benefit of both the nearest Los Altos neighbors and the LAHS band. Band practice is recognized as necessary and is supported in the community, but the resultant noise levels are considered by neighbors to be the most intrusive of all field uses.

**Response C.3:** The District is looking at options to reduce band preparation and take down time for practices and will analyze the reduction in sound associated with the various solutions. Discussions of alternative solutions are outside of the scope of the DEIR, which is focused on the environmental effects of physical changes to the environment.

**Comment C.4:** P. 112 (EIR p. 103) Impact NOI-1: *“The project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (Less than Significant Impact with Mitigation Incorporated)”*

Comment: In many months of Workgroup meetings and discussions, the District and MVLA Neighborhood Cares have mutually considered that noise impact on the neighborhoods surrounding LAHS and MVHS is by far the greatest of all concerns with this project in the coming years. MVLA Neighborhood Cares has done its own calibrated measurements of past real-time nighttime athletic events (primarily football), and we have worked in extensive cooperation with the District and the sound design subcontractor, K&K Sound, to carry out game simulations (demos) and sound measurements at both schools, three times in 2020. The noise study done by Illingworth & Rodkin, Inc. (p. 307, EIR Appendix) was substantive, and their conclusions are based on nominal adherence to both the Mountain View Noise Control Ordinance and the Los Altos General Plan Noise Standards (see p. 109-110, EIR pp. 100-101), both of which take into account existing ambient short and long term measurements of average dB, estimated maximum averaged event dB readings, and ordinance combinations of the two.

The Illingworth & Rodkin study reports decibel readings at various locations around Los Altos High School, checks whether they exceed “the local general plan or noise ordinance”, notes that they do not, and concludes that there is a “less than significant impact with mitigation incorporated.” What this study and others of its kind do not take into account is the impact that the extension of school field activities into the night, as late as 10:00 p.m., will have on the school’s neighbors. The neighbors – people – are the environment on which there is an impact, not sound meters. In addition, the accuracy of this EIR noise impact conclusion is highly dependent on many variables (such as where the measurements are taken, and when). Moreover, if unregulated, the distributed sound system planned for this project could inadvertently be mis-used by untrained operators, lacking well-documented real-time game sound system operation procedures. Without proper planning, implementation, and real-time game situation tuning of these systems, nighttime events could easily exceed municipal noise ordinances for the nearest neighbors to the school property lines. MVLA Neighborhood Cares believes that the distributed sound system proposed for the project is the best possible approach, but we also think that it will inevitably fail to meet local ordinances without proper usage planning, documentation, and training.

Requested revision: None, but there has been mutual agreement with the District that when the sound systems are first operated in initial night games in each of the sports, there will be a pre-planned sound mitigation process involving team participation between MVLA Neighborhood Cares expert members and school staff, to tune the systems at both fields such that:

1. Competition game sound systems are operated at the minimum sufficient level necessary for participants on the athletic field and in the bleachers. This will optimize acceptable noise levels at the schools’ property lines.
2. For a given game, once a balanced sound level inside and outside the stadiums is agreed on, the implementation team will capture that system setting with a system program number. These competition game sound levels will be listed in a user manual for future operators that indicates appropriate system programs (up to 99). The District’s chosen sound system engineer, K&K Sound, has stated that this can be done by using the



system's ability to control and set the sound output of each of the distributed stadium speakers for any actual game situation. The goal will be to fine tune the whole system to account for future fan attendance differences on the home and visitor sides. For example, a lightly attended football game with home stands two-thirds full and visitor stands one third filled would be program #1, a game with home stands completely filled and visitor stands one-half filled would be program #2, a homecoming game with both stands filled would be program #3, and a soccer game with appropriate fan attendance settings would be program #4. Documented properly, a newly trained sound engineer should be able to pre-set the system based on expected or observable attendance or change it as attendance may rise or fall in real time.

3. 1 and 2 above will require considerable due diligence time and effort by school personnel working with identified expert MVLA Neighborhood Cares volunteers using calibrated professional sound meters. It is expected that this due diligence effort will require at least two real time football game tuning efforts, and one each for other sports later in the year.

MVLA Neighborhood Cares asks that a Sound System Implementation Workgroup be created to plan the implementation details of this agreement. As we have seen in Workgroup discussions involving MVLA Neighborhood Cares and the District, problems involving the projection of sound into the surrounding neighborhoods went unaddressed for years. In addition, systems change, people are replaced, and institutional memory is lost. For these reasons, we think that the Sound System Implementation Workgroup should not be a One-and-Done affair. We depend on the District and both school Administrations to work with MVLA Neighborhood Cares to carry out this process.

**Response C.4:** The comment requests that, "MVLA Neighborhood Cares asks that a Sound System Implementation Workgroup be created to plan the implementation details of this agreement." The District plans to continue to work with Neighborhood Cares on sound system implementation as outlined below.

As set forth in AR 7325 and stated in the DEIR, school administrators shall make sure that operators of the public address systems have been properly trained. The District will develop written procedures for users that describe the restrictions of use. Additionally, the District will have the stadium public address system professionally designed, installed, tuned, and field-tested with the goals of meeting local noise standards.

Furthermore, the DEIR states that distributed sound systems are equivalent or superior to a single- or dual-speaker system when considering potential community noise impacts. The project would replace the existing speaker system (consisting of three speakers attached to the press box) with a distributed sound system, which would allow for greater control of system noise levels as noted in Comment A.4.

Lastly, it should be noted that the DEIR states on page 103 under Impact NOI-1 that the impact would be "less than significant" not "less than significant with mitigation incorporated" as stated in Comment C.4.

**Comment C.5:** P. 325 (EIR Appendix D p. 11) Table 8: Proposed Use of the Field Lights and Public Address System.

Comment: The matrix inserted as Table 8 for LAHS is the MVHS Table.

Requested revision: Insert the LAHS table, as is shown on p. 13 (LAHS EIR p. 4)

**Response C.5:** Comment noted. Table 8 in Appendix D incorrectly reflects Table 2.2-1 in the Mountain View High School Lights and PA System DEIR. The analysis contained in Appendix D, however, is consistent with the uses proposed by the project, as shown in Table 2.2-1 of the Los Altos High School Lights and PA System DEIR, as well as the estimated attendance changes described in Section 2.0 Project Description. Table 8 in Appendix D has been updated to reflect the LAHS table, as shown in Section 5.0 Draft EIR Text Revisions. No substantive change to the analysis in the DEIR would be required based on this revision.

## SECTION 5.0 DRAFT EIR TEXT REVISIONS

This section contains revisions to the text of the Los Altos High School Lights and PA System Draft EIR dated April 2020. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~.

Page 74 Section 3.8.2.1 Project Impacts, under Impact GHG-1, the third paragraph will be **REVISED** as follows:

The additional attendees would predominantly be students and parents from within the District boundaries; thus, the vehicle miles traveled (VMT) of the project would be less than events which have a regional or countywide base. ~~Further, a few LAHS football games are hosted at Foothill College and implementation of the project would reduce the need for spectators to travel to this offsite location to attend games; this would reduce the VMT (and associated GHG emissions) compared to existing conditions.~~ The proposed project would not increase enrollment capacity at LAHS.

Page 132 Section 3.17.2.2 Project Impacts, under Impact TRN-2, last two sentences in the second paragraph will be **DELETED** as follows:

The project would result in an increase in attendance for football games and other sporting events. An increase in the number of attendees would result in an increase in VMT generated by the additional attendees. The project would result in a maximum increase in attendance of 700 people (from 1,500 to 2,200 attendees for rivalry football games hosted on campus). Football season typically lasts for seven weeks between September and November with three or four games hosted at LAHS. Therefore, the average trip increase per day would be approximately 87 trips.<sup>1</sup> ~~It should be noted that evening football games have been previously held at Foothill College once or twice per season. Therefore, attendees would be making shorter trips by having the football games on campus and reducing overall VMT.~~

Appendix D Table 8 on page 11 has been **REVISED** to include the LAHS table as follows:

**TABLE 8 Proposed Use of the Field Lights and Public Address System**

Proposed Use of Field	Use of Field Lights	Use of Public Address System
Sports Games	<del>A total of up to 25 nights of varsity/junior varsity interscholastic competition per annual season, comprised of the annual seasons for football (five games), boy's and girls' soccer (10 games), and boy's and girls'</del>	<del>Yes (play by play commentary only permitted during football games). All other athletic competitions shall limit the use of the public address systems to announcements, warm up music or similar uses without running commentary.</del>

<sup>1</sup> 700 attendees / 3.24 persons per vehicle x 2 trips (inbound and outbound) x 1 event per week / 5 days per week = 87 trips per day

	lacrosse (10 games), concluding by 10:00 PM at the latest <sup>1</sup>	
Sports Practices	Monday through Friday, concluding by 8:30 PM. Not during weekend nights unless under unusual circumstances approved by the Superintendent or designee	No
Marching Band Practice	Two weeknights per week between August and November; one practice concluding by 8:00 PM and one practice concluding by 6:30 PM. <sup>2</sup>	Yes
Marching Band Performance	Five football competitions, commencement, and up to three special evening events.	Yes
Special Events	Commencement and up to three special evening events per year, concluding by 9:00 PM.	Yes
Holiday Use	The stadium field lights will not be used on school holidays, or in the period of time between commencement ceremonies and the beginning of sports practice for the fall season, as permitted by California Interscholastic Federation (CIF) rules. <sup>4</sup>	Use would be limited by all provisions described in BP 7325 policy and shall require prior approval by the superintendent or designee. Use of public address systems during holidays shall not begin prior to 10:00 AM <sup>3</sup> ; shall be limited to necessary and occasional announcements, and occasional music played at volumes low enough not to interfere with ordinary conversation at the school site's boundary lines; and shall end by 2:00 PM.

<sup>1</sup>Football competitions would typically end by 10:00 PM; all other competitions would typically end by 8:30 PM. Adequate lighting (non-competition level) would be maintained after games to allow for safe exiting of the field.

<sup>2</sup>Marching band practices would not occur within 12 hours of each other. Practices could be extended in the event of postseason regional or national competitions, but not beyond December 31, except by permission of the Superintendent or designee. Marching band practice may be held during morning, afternoon and Saturday hours without stadium lights with no restriction.

<sup>3</sup>The one exception being Thanksgiving morning (Turkey Trot event, where sound equipment would be in use starting at 8:00 AM)

<sup>4</sup>CIF schedule shows the first day of practice as August 9, 2020 for fall sports.

<u>Proposed Use of Field</u>	<u>Use of Field Lights</u>	<u>Use of Public Address System</u>
<u>Sports Games</u>	<u>A total of up to 30 nights of varsity/junior varsity interscholastic competition per annual season, comprised of the annual seasons for football and field hockey (10 games), boy's and girls' soccer (10 games),</u>	<u>Yes (play-by-play commentary only permitted during football games). All other athletic competitions shall limit the use of the public address systems to announcements, warm-up music or</u>

	<u>boy's and girls' lacrosse (10 games), concluding by 10:00 PM at the latest<sup>1</sup></u>	<u>similar uses without running commentary.</u>
<u>Sports Practices</u>	<u>Monday through Friday, concluding by 8:30 PM. Not during weekend nights unless under unusual circumstances approved by the Superintendent or designee</u>	<u>No</u>
<u>Marching Band Practice</u>	<u>Two weeknights per week between August and November; one practice concluding by 8:00 PM and one practice concluding by 6:30 PM.<sup>2</sup></u>	<u>Yes</u>
<u>Marching Band Performance</u>	<u>Five football competitions, commencement, and up to three special evening events.</u>	<u>Yes</u>
<u>Special Events</u>	<u>Commencement and up to three special evening events per year, concluding by 9:00 PM.</u>	<u>Yes</u>
<u>Holiday Use</u>	<u>The stadium field lights will not be used on school holidays, or in the period of time between commencement ceremonies and the beginning of sports practice for the fall season, as permitted by California Interscholastic Federation (CIF) rules.<sup>3</sup></u>	<u>Use would be limited by all provisions described in BP 7325 policy and shall require prior approval by the superintendent or designee. Use of public address systems during holidays shall not begin prior to 10:00 AM; shall be limited to necessary and occasional announcements, and occasional music played at volumes low enough not to interfere with ordinary conversation at the school site's boundary lines; and shall end by 2:00 PM.</u>

<sup>1</sup> Football competitions would typically end by 10:00 PM; all other competitions would typically end by 8:30 PM. Adequate lighting (non-competition level) would be maintained after games to allow for safe exiting of the field.

<sup>2</sup> Marching band practices would not occur within 12 hours of each other. Practices could be extended in the event of postseason regional or national competitions, but not beyond December 31, except by permission of the Superintendent or designee. Marching band practice may be held during morning, afternoon and Saturday hours without stadium lights with no restriction.

<sup>3</sup> CIF schedule shows the first day of practice as August 9, 2020 for fall sports.

Appendix E Chapter 4, Under VMT Analysis (page 23), last two sentences in the third paragraph will be **DELETED** as follows:

The project would result in an increase in attendance for the football games and other sporting events. An increase of the number of attendees would result in an increase in VMT generated by the additional attendees. Currently, football games with up to 1,500 attendees are played on Saturdays, or occasionally at Foothill College if played at night. The project would increase the attendance of the football games by up to 700 attendees. Football season typically last for 7 weeks between September

and November with 3 or 4 games hosted by LAHS. Therefore, the average trip increase per day would be approximately 87 trips ( $700 \text{ attendees} / 3.24 \text{ persons per vehicle} \times 2 \text{ trips (inbound and outbound)} \times 1 \text{ event per week} / 5 \text{ days per week} = 87 \text{ trips per day}$ ) when there is a football game during the week. ~~It should be noted that evening football games have been previously held at Foothill College once or twice per season. Therefore, attendees would be making shorter trips by having the football games on campus.~~

**Appendix A: Draft EIR Comment Letters**

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[mike.mathiesen@mvla.net](mailto:mike.mathiesen@mvla.net)

and via US Post

May 29, 2020

Re: Los Altos High School, the Center of Our Neighborhood

Dear Mr. Mathiesen:

In anticipation of the greatest change to our neighborhood in more than 50 years, we respectfully request improvements that benefit all parties associated with our largest neighbor – Los Altos High School students/staff, area residents and the MVLA High School District.

As you may recall, at meetings hosted by the District on October 16, 2018 and February 10, 2020 we stated in the public comment period (with you presiding) that as part of the construction project, MVLA School District consider planting trees along the north side of Los Altos High School property (bordering Jardin Drive). Currently, a barren strip with irrigation piping from the School's on-site water wells, occupies the space between the tennis courts, sports fields and Jardin Drive.

We hope to hear soon of the District's plans to move ahead with this request. Representatives of our Committee, *Tree-Lined Streets*, are willing to assist the District in tree species selection, placement and acquisition of suitable trees.

In discussions with neighborhood residents, we have also learned of a preference to improve this same space by removing the opaque (and ragged) netting hanging on the tennis courts' chain link fences. We suggest that you either leave the fence open (do we really need a wind break that darkens the space and requires replacement every few years?). Or, if the wind break and its ongoing expense is deemed a necessity by the District, we request that it be of a transparent material.

In consideration of our request, please try to understand that *the rear of the high school is the center of our residential neighborhood*. Surely the District Board can agree that sensible landscaping (shaded streets and sidewalks), on par with the front of Los Altos High School, is



an appropriate request and a genuine improvement at little cost. We ask that the District communicate its intentions to us and the community publically

We look forward to learning your thoughts.

Respectfully, *Stephen Friedman*

Ha Pham, Stephen Friedman, Secretary:  
Altos

Almond-Edith-Jardin Neighborhood, Los

Karen Vasser, Carole Katz:

North Village Neighborhood, Los Altos

Mike Kasperzak, David Maluf:  
View

Gemello Neighborhood, Mountain

COMMENTS & QUESTIONS REGARDING DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR THE LOS ALTOS HIGH SCHOOL LIGHTS AND PUBLIC ADDRESS SYSTEM  
PROJECT (SCH # 2020010295)

**1 --Paragraph 2.2 on Page 3:**

There is no discussion of the need for the project. The high school has functioned without the need or expenditure for field lights for over 65 years including having won a number of varsity football championships. A full explanation of the sudden need for lighting and load speakers should be provided which justifies such a need and the rationale for creating what will be an inconvenience and disturbance of the peace for neighboring residences.

Note: Use of the Foothill College alternate solution eliminates all issues regarding noise, parking and lights and most of the concerns regarding traffic congestion. Please provide a cost benefit comparison of the Foothill College use to that of the cost benefit of adding lights and speakers to the Los Altos High School field.

Please include a discussion of the cumulative effects of noise, lights, traffic congestion, parking and potential for unsafe behaviors in the neighborhood around Los Altos High School on game nights.

**2 --Trip Generation beginning on Page 129:**

It is not accurate to use Archbishop Mitty High School as a reference for comparable traffic activities at Los Altos High School. Archbishop Mitty High School is a private Catholic High School where many of those attending commute some distance and are not local residents. Students at Los Altos High School are all local to the school district and there are virtually no commuters. Those driving to games at Mitty may have a greater necessity for carpooling while many at Los Altos may not.

In addition, most schools in the Santa Clara Valley Athletic League are south of Los Altos. Students driving from other schools to attend games in Los Altos will need to traverse through the town local streets from Highway 280 or other locations to attend games at Los Altos High School. Congestion caused in these travel corridors to the school have not been addressed.

The EIR Trip Generation Study cannot be considered reliable by using Mitty High criteria and ignoring the travel through Town by the students from other schools. The Trip Generation should be revised based on a Los Altos High School game, not Mitty High which is not representative and also should include the effects of added traffic traveling through town from other schools at night.

### **3 --The last sentence in the 3<sup>rd</sup> Paragraph on Page 132 is not correct:**

The sentence that indicates use of the Los Altos High School football field instead of the Foothill Campus field will make shorter trips and reduce overall VMT is not true when considering those who are attending the game from the opponent's school district. Almost half those attending games may be from schools outside of Los Altos and south of town. The most convenient route is Highway 280 which exits at El Monte Avenue adjacent Foothill college. Their travel time and added traffic congestion on the local streets in Los Altos is almost totally eliminated when the Foothill College venue is used. In addition, many Los Altos students live much closer to Foothill College than Los Altos High School, especially those in Los Altos Hills and all those who live west of Foothill Expressway. And others have an equal travel distance to either location. Please provide a correct and more detailed evaluation of VMT during use of the Foothill College field verses that at Los Altos High. What is stated in the EIR is not correct.

### **4 --Paragraph 7.2.2.1 Location Alternative**

This paragraph makes a very, very inaccurate assessment with regard to the use of the Foothill College football field as an alternate location. The statement that use of the Foothill College football field would lead to greater impacts on vehicle travel and noise exposure is untrue. In fact, the opposite is true. At Foothill College almost all traffic generated on local streets by those coming from other schools will be mostly eliminated. The assessment does not even mention this fact. As noted above, all traffic coming from schools south of Los Altos can access the Foothill College field directly without the use of Los Altos or Los Altos Hills local streets. Further, the disturbance of peace in the residential neighborhoods surrounding Los Altos High School would not only be mitigated, it would be mostly eliminated. The Foothill college field does not have nearby or adjacent residential homes that would be disturbed by game noise, bands or traffic. It does not require that parking for games be accommodated on many surrounding residential streets because ample parking is available at the college on existing parking lots. Please correct this discussion.

### **5 --Cumulative Negative Effects have not been Addressed**

The EIR seems to indicate that the negative effects of noise, light pollution, traffic, and on-street overflow parking individually are below thresholds of tolerance. However, an assessment of the effects taken as a whole on the current environment and desirability of the adjacent residential neighborhood are not addressed. Please provide an assessment of the degrading effects on the much valued current neighborhood environment when considering the difference between the quiet, peaceful evenings that currently exists to the changed conditions caused by the project's combined effects of loud speakers, new game noise, new traffic and new congestion, new light pollution and new street overflow parking on the surrounding neighborhood.

**6 --The 2 million fund source and comparison cost to benefit for the use of the funds that alternately could be used to assist students in need of equipment for remote learning or faculty needs for housing locally should be addressed.**

- 1) Please describe the project funding source and if it is publicly approved funding.
- 2) Are the funds for this project being provided for their highest and best use? Could these funds be better used to assist students in need of internet and home computers for remote learning requirements. Please provide an evaluation of this alternative use.
- 3) Could these funds provide additional contributions to the new housing project being promoted by the County that is to provide low cost nearby housing in South Palo Alto for faculty. Please provide and evaluation of this alternative use.

**7 --Not all neighbors adjacent the school have received Notification of the Draft EIR**

Please make sure all nearby residents entitled to make comments have receive notice of the availability of the Draft EIR and have been notified of the comment and response period. We know of neighbors immediately adjacent to the school who have not received notification.

**Please send responses to email at:**

**[beatrixs@aol.com](mailto:beatrixs@aol.com) and [aedschott@aol.com](mailto:aedschott@aol.com)**

Date: Mon, Jun 1, 2020 at 11:07 AM

Subject: MVLA Neighborhood Cares Response to MVLA EIRs

To: Mathiesen, Mike <[Mike.Mathiesen@mvla.net](mailto:Mike.Mathiesen@mvla.net)>

Cc: Nellie Meyer <[nellie.meyer@mvla.net](mailto:nellie.meyer@mvla.net)>, Sanjay Dave <[sanjay.dave@mvla.net](mailto:sanjay.dave@mvla.net)>, Fiona Walter <[fiona@stanfordalumni.org](mailto:fiona@stanfordalumni.org)>, Catherine Vonnegut <[catherine.vonnegut@mvla.net](mailto:catherine.vonnegut@mvla.net)>, Phil Faillace <[mvlafailace@yahoo.com](mailto:mvlafailace@yahoo.com)>, Debbie Torok <[torok111@aol.com](mailto:torok111@aol.com)>

Dear Mike,

MVLA Neighborhood Cares has read the MVHS and LAHS EIRs, and we recommend District consideration of our attached letter of response.

Additionally, for the purposes of the EIR process record, I am attaching our three last most recent PowerPoint agendas, which reflect our past Workgroup discussions with the District. These workgroups centered around three topics: Light and Sound, Public Safety, and Neighborhood Communications, and were comprised of 12 two-hour discussions between MVLA Neighborhood Cares representatives, MVLA Board representatives, and MVLA and MVHS representatives of both relevant faculty and administration. We recognize that the final policies BP 7325, AR 7325 and AR 1330 are the agreed final outcomes of the discussions and negotiations around the agenda points in the attached presentations, but we would like these Workgroup presentations to be included as part of the record.

Also for the record, I am attaching a draft version of what we intended be recognized as an MOU between MVLA Neighborhood Cares and the District. The Board did not wish to make these points part of the decision process that eventuated in the new policies, but in the June 2019 Board meeting, then President Phil Faillace did recognize that there were items in the document that he felt could, and should, be accomplished rather easily and quickly as a show of good faith:

1. Minor upgrades to the schools' portable sound systems
2. Implementation of a gate at LAHS that will make band practice easier to set up
3. Having an acoustics consultancy at both schools that would result in minor upgrades in the type and use of current noise producing devices, for the benefit of nearby neighbors who have to live with pool whistles and shot clocks 7 days a week, morning through late evening.

With the advent of the Coronavirus we are all living in a different context, probably for many months to come. However, as time passes, we want to make sure that these items, that did not get written into policy, are still at the attention of the Board and the MVLA Administration as accepted action intentions.

We appreciate your attention to these documents as the EIR process proceeds.

Regards,

Mac

Mac McConnell, *on behalf of MVLA Neighborhood Cares*

1181 Bruckner Circle, Mountain View, CA 94040  
650 996 7269

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Regards,

Mac

Mac McConnell  
650 996 7269

## LAHS DEIR Response

LAHS DEIR – page numbers refer to document page number when opened in Adobe Acrobat.

- pp. 1-170, the EIR body
- pp. 171-208, Appendix A, comment letters from neighbors and agencies
- pp. 209-221, Appendix B, photometric (field lights) measurements, Musco.
- pp. 222-300, Appendix C, March, 2014 field upgrade geotechnical and hazard investigation, Cleary Consultants, Inc.
- pp. 301-312, Appendix C December, 2019 drilling recommendations for light poles, Cleary Consultants, Inc.
- pp. 313-364, Appendix D, April, 2020 noise report by Illingworth & Rodkin, Inc.
- pp. 365-395, Appendix E, April, 2020 traffic report by Hexagon/David J. Powers & Associates, Inc.
- pp. 396-424 , LAHS Field Lighting Project TIA Technical Appendices

p. 19 (EIR p. 10) Public Address System: *“The proposed project includes installation of an upgraded PA system consisting of up to 12 pole-mounted speakers on 10 poles (two poles out of the 10 would have two speakers mounted to them), at 12 to 18 feet in height, located on the east and west sides of the field (see Figure 2.2-4).*

Comment: Later in the document, pp. 308-312 (EIR Cleary Consultants, Inc. Drilled Pier Foundation Recommendations), there are extensive specifications for how the Musco field light poles will be drilled, footed and installed, but there are no such specifications for the speaker poles which are part of this project.

Requested revision: *None, based on RGM Kramer’s verbal assurance to us that the State of California Architect Board treats these poles similarly to flag poles, and does not require drilling and siting specifications as part of this EIR. If this is not the case, we ask the District to so notify us before submitting the final EIR.*

p. 56 (EIR p. 47, 3.3.2.2): Cumulative Impacts: *“Operation of the proposed stadium lights and PA system would not generate new sources of emissions. Construction of the proposed project would generate diesel emissions and dust. However, construction activities would be temporary and required to comply with state and local regulations and implement the mitigation measures described above.”*

Comment: Since LAHS night games have always been played at other fields, there would indeed be an increased generation of new sources of emissions in the project operation phase. As previously stated in the MVHS review section above, neighbors of both schools are familiar with the fact that visitor team buses are often left idling for long periods of time while games are in progress. This occurs perhaps so drivers can stay warm, but it is to the detriment of nearby sensitive receptors. The resulting impact on nearby neighbors is a noxious level of diesel exhaust in the air, sometimes lasting for as long as the athletic competition goes on. Please reference this language on p. 51 (EIR p. 42) of the EIR: *“Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. Diesel exhaust is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (most susceptible to injury).. 17 Chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the California Air Resources Board (CARB). “ Please refer back to the construction phase mitigation plan with regard to this problem, on p. 6 (EIR p. v, Impact Air 3.1) “Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]).”*

Requested revision: *We request that the District add a similar diesel bus idling mitigation statement during athletic events, under the Project Operation section MM AIR-2.1, pp. 55-56 (EIR pp. 46-7), or where appropriate. Doing so*

will also bring the District into alignment with the City of Los Altos's anti-idling campaign. Although Los Altos does not have an anti-idling ordinance, it is well aware of the problem, as can be seen here: <https://www.facebook.com/CityOfLosAltos/photos/the-city-has-implemented-a-new-anti-idling-campaign-focused-on-vehicles-using-ci/983138585202304/>). For example, at Shoup Park there is signage in the parking lot instructing vehicle operators to turn off the ignition. Thus, diesel bus idling mitigation would be consistent with official Los Altos policy, which is one step away from an ordinance.

p. 108 (EIR p. 99) Community Impact: *"Marching band directors shall take reasonable steps to minimize the impact of sound on the surrounding neighborhoods during practice sessions. The District shall have minor alterations made to practice areas as necessary to facilitate the implementation of these steps."*

Comment: During the Workgroup meetings that preceded the Board's new final policy adoptions in June of 2019, the LAHS Band Director expressed a wish that a gate and mobile ramp be installed at the north fence between the track and the baseball field. Even when the new lights and sound are installed on the existing field, the Director prefers to practice on the outfield of the baseball field. This was discussed in a meeting with the LAHS Principal and MVLA Neighborhood Cares representatives from north Los Altos. Continuing band practice on the baseball outfield would mitigate sound impact on the LAHS east neighbors and would reduce student instrument transportation time each practice day by 40 minutes.

Requested revision: *MVLA Neighborhood Cares asks that the Board and the District and LAHS Administration contract to have this inexpensive gate and mobile ramp solution implemented, for the benefit of both the nearest Los Altos neighbors and the LAHS band. Band practice is recognized as necessary and is supported in the community, but the resultant noise levels are considered by neighbors to be the most intrusive of all field uses.*

p. 112 (EIR p. 103) Impact NOI-1: *"The project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (Less than Significant Impact with Mitigation Incorporated)."*

Comment: In many months of Workgroup meetings and discussions, the District and MVLA Neighborhood Cares have mutually considered that noise impact on the neighborhoods surrounding LAHS and MVHS is by far the **greatest of all concerns** with this project in the coming years. MVLA Neighborhood Cares has done its own calibrated measurements of past real-time nighttime athletic events (primarily football), and we have worked in extensive cooperation with the District and the sound design subcontractor, K&K Sound, to carry out game simulations (demos) and sound measurements at both schools, three times in 2020. The noise study done by Illingworth & Rodkin, Inc. (p. 307, EIR Appendix) was substantive, and their conclusions are based on nominal adherence to both the Mountain View Noise Control Ordinance and the Los Altos General Plan Noise Standards (see p. 109-110, EIR pp. 100-101), both of which take into account existing ambient short and long term measurements of average dB, estimated maximum averaged event dB readings, and ordinance combinations of the two.

The Illingworth & Rodkin study reports decibel readings at various locations around Los Altos High School, checks whether they exceed "the local general plan or noise ordinance," notes that they do not, and concludes that there is a "less than significant impact with mitigation incorporated." What this study and others of its kind do not take into account is the impact that the extension of school field activities into the night, as late as 10:00 p.m., will have on the school's neighbors. The neighbors—people—are the environment on which there is an impact, not sound meters. In addition, the accuracy of this EIR noise impact conclusion is highly dependent on many variables (such as where the measurements are taken, and when). Moreover, if unregulated, the distributed sound system planned for this project could inadvertently be mis-used by untrained operators, lacking well-documented real-time game sound system operation procedures. Without proper planning, implementation, and real-time game situation tuning of these systems, nighttime events could easily exceed municipal noise ordinances for the nearest neighbors to the school property lines. MVLA Neighborhood Cares believes that the distributed sound system



proposed for the project is the best possible approach, but we also think that it will inevitably fail to meet local ordinances without proper usage planning, documentation, and training.

Requested revision: *None, but there has been mutual agreement with the District that when the sound systems are first operated in initial night games in each of the sports, there will be a pre-planned sound mitigation process involving team participation between MVLA Neighborhood Cares expert members and school staff, to tune the systems at both fields such that:*

- 1. Competition game sound systems are operated at the minimum sufficient level necessary for participants on the athletic field and in the bleachers. This will optimize acceptable noise levels at the schools' property lines.*
- 2. For a given game, once a balanced sound level inside and outside the stadiums is agreed on, the implementation team will capture that system setting with a system program number. These competition game sound levels will be listed in a user manual for future operators that indicates appropriate system programs (up to 99). The District's chosen sound system designer, K&K Sound, has stated that this can be done by using the system's ability to control and set the sound output of each of the distributed stadium speakers for any actual game situation. The goal will be to fine tune the whole system to account for future fan attendance differences on the home and visitor sides. For example, a lightly attended football game with home stands two-thirds full and visitor stands one third filled would be program #1, a game with home stands completely filled and visitor stands one-half filled would be program #2, a homecoming game with both stands filled would be program #3, and a soccer game with appropriate fan attendance settings would be program #4. Documented properly, a newly trained sound engineer should be able to pre-set the system based on expected or observable attendance or change it as attendance may rise or fall in real time.*
- 3. 1 and 2 above will require considerable due diligence time and effort by school personnel working with identified expert MVLA Neighborhood Cares volunteers using calibrated professional sound meters. It is expected that this due diligence effort will require at least two real time football game tuning efforts, and one each for other sports later in the year.*

*MVLA Neighborhood Cares asks that a Sound System Implementation Workgroup be created to plan the implementation details of this agreement. As we have seen in Workgroup discussions involving MVLA Neighborhood Cares and the District, problems involving the projection of sound into the surrounding neighborhoods went unaddressed for years. In addition, systems change, people are replaced, and institutional memory is lost. For these reasons we think that the Sound System Implementation Workgroup should not be a One-and-Done affair. We depend on the District and both school Administrations to work with MVLA Neighborhood Cares to carry out this process.*

p. 325 (EIR Appendix D p. 11) Table 8: Proposed Use of the Field Lights and Public Address System.

Comment: The matrix inserted as Table 8 for LAHS is the MVHS Table.

Requested revision: *Insert the LAHS table, as is shown on p. 13 (LAHS EIR p. 4)*

Thank you for your consideration of these comments, whether in part as revisions to the current document or as additional guidance for the project implementation process and operational guidelines.

Regards,

Mac

Mac McConnell, *on behalf of MVLA Neighborhood Cares*  
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