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Appendix A: Draft EIR Comment Letters

SECTION 1.0 INTRODUCTION

This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (Final EIR) for the Mountain View 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 and all documents referenced in the Final EIR 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

The Draft EIR for the Mountain View 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 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

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

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.

<u>Comment Letter and Commenter</u>	<u>Page of Response</u>
Organizations, Businesses, and Individuals	5
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B. Mac McConnell, on behalf of MVLA Neighborhood Cares (dated May 31, 2020)	7
C. Dave Stubbs (dated May 31, 2020)	14

ORGANIZATIONS, BUSINESSES, AND INDIVIDUALS

A. Walt Rau (dated May 8, 2020)

Comment A.1: Table 1, which lists proposed uses, addresses marching band, both for practices and performances. In both cases, use of the public address system is allowed. Based upon MVLA meetings with MVLA Neighborhood Cares, I am confident that reasonable noise restrictions will be placed upon the public address system. However, no noise limits are stipulated for marching band itself. In other words, according to this EIR, noise emanating directly from marching band is unlimited. This represents a quality-of-life deterioration for nearby homes. Currently, without stadium lights, darkness forces marching band to stop practices or performances at sunset. This allows affected nearby homes to open windows, allowing enough time to cool off their interiors, especially sleeping areas, prior to bedtime. If marching band continues after sunset, windows cannot be opened, houses cannot be cooled adequately, and sleeping areas will remain uncomfortably hot.

With this in mind, the following is proposed. First, limit all marching band practices to completion no later than 6:30 pm. Second, monitor noise levels created by marching band, and limit noise levels, at the boundary, according to the same requirements for the PA system.

Response A.1: The competitive season for Mountain View High School marching bands historically begins in August and continues through November. As stated in Table 2.2-1, practice may be held with the use of the stadium lights and the public address system one weeknight per week ending by 8:00 p.m. and an additional weeknight per week ending by 6:30 p.m. All other afternoons, practice would end at sunset or sooner, as they do now. As discussed in *Section 3.13 Noise*, based on prior measurements of marching band practice noise levels at Santa Teresa High School in San José, California, the estimated noise levels from marching band practices would not amount to a substantial increase in day-night average noise levels at nearby sensitive receptors.

The Mountain View General Plan and Municipal Code do not specify noise limits for special events such as marching band practices. Section 21.26 of the Municipal Code, which establishes the limit of 55 dBA during daytime hours (7 a.m. to 10 p.m.) when measured at any location on a receiving residentially used property, applies only to “stationary equipment” such as HVAC equipment, or in this case, a PA system. As there aren’t any applicable noise regulations for special events in the General Plan or Municipal code, marching band practice noise was assessed in the same fashion as noise from other sports events and practices which would occur or are already occurring at the field. Noise from most of these events would continue to temporarily exceed 55 dBA at the nearest residence (the ST-1 through ST-5 measurements in Table 5 of Appendix D calculated football game noise exceeding 55 dBA L_{eq} at nearby residences from a game which took place on 10/25/19). However, the overall contribution of these events as a result of the installation of field lighting and therefore events occurring later in the day, and marching band practice in particular, would not result in a significant increase to the existing ambient noise environment in

the vicinity, as they are temporary in nature. Marching band practice and special events do not have the same limits in place as mechanical noise. Events and mechanical noise cannot be compared directly given the temporary vs. ongoing generation of noise.

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

Comment B.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.

MVHS DEIR Response

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

- Pp. 1-168, the EIR body
- Pp. 181-200, Appendix A, comment letters from neighbors and agencies
- Pp. 201-214, Appendix B, photometric (field lights) measurements, Musco.
- Pp. 216-300, Appendix C, March 2014 field upgrade geotechnical and hazard investigation, Cleary Consultants, Inc.
- Pp. 301-305, Appendix C December 2019 drilling recommendations for light poles, Cleary Consultants, Inc.
- Pp. 306-340, Appendix D, April 2020 noise report by Illingworth & Rodkin, Inc.
- Pp. 341-376, Appendix E, April 2020 traffic report by Hexagon/David J. Powers & Associates, Inc.
- Pp. 376-442, MVHS Field Lighting Project TIA Technical Appendices.

Please consider the following:

P. 19 (EIR p. 10) Public Address System: *“the current PA system consists of three speakers which are attached to the press box at the western bleachers. The proposed project includes installation of an upgraded PA system, comprised of up to 12 speakers. Two of the speakers would be attached to the existing press box and the remaining 10 would be pole-mounted speakers, 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. 301-305 (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 B.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 B.2: P.19 (EIR p.10) Public Address System: *“The proposed development will only be utilizing the new poles with speakers and usage will abide by the new policies that have been adopted (See Table 2.2-1). The public address system would be designed to conform to the exterior noise limits section of the City of Mountain View Municipal Code and 2030 General Plan. The applicable noise standards are described in Section 3.13 Noise.”*

Comment: Later in the EIR, under Regulatory Framework, p. 109 (EIR p.100) there is the following statement: *“The Natural Environment & Hazards Element of the City of Los Altos’ General Plan contains Noise and Land Use Compatibility Standards policies that are applicable to the project.”*

Requested Revision: We request that the language on p. 19 (EIR p. 10) *“The public address system would be designed to conform to the exterior noise limits of the City of Mountain View Municipal Code and 2030 General Plan”* be replaced by the following language: *“The public address system would be designed to conform to the exterior noise limits section of the City of Mountain View Municipal Code and 2030 General Plan, the Los Altos General Plan Noise Standard, and the City of Los Altos Municipal Code.”*

Response B.2: The City of Los Altos’ noise standards are applicable to the project because the project is located at the border between the cities of Mountain View and Los Altos. Noise generated by project activities could affect land uses in Mountain View, to the north/northwest, and Los Altos, to the south. The PA system would be designed to conform to the exterior noise limits section of the City of Mountain View Municipal Code and 2030 General Plan, due to its location within Mountain View city limits, as well as the noise standards set forth in the Los Altos Municipal Code, as stipulated in Administrative Regulations AR 7325. While AR 7325 only explicitly requires conformance with the Los Altos Noise Control Ordinance, the noise analysis in *Section 3.13* of the DEIR concludes that noise generated by the PA system would not result in substantial noise increases that would conflict with both the cities’ applicable noise standards. The text in the DEIR has been revised accordingly to include all applicable noise standards, as shown below in Section 5.0 Draft EIR Text Revisions.

Comment B.3: P. 57 (EIR p. 48, 3.3.2.3): 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: While we recognize that there would not be new sources of emissions during the operation phase at MVHS, 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 B.3: 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 could 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 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 not change but would be allowed to occur during nighttime hours under the proposed project. Thus, the project would not result in an increase in diesel exhaust emissions beyond baseline conditions due to additional team buses transporting players and coaches to and from the site or generating exhaust emissions when idling. The project would, however, remove the need for portable lights to be used on-site, which are typically powered by diesel generators. Thus, diesel exhaust emissions from operation of the portable diesel generators would be eliminated by the project. Team buses parking and idling would be subject to compliance with any formal idling ordinance adopted by the City of Mountain View and Los Altos, at the time it is adopted and as applicable to the proposed uses under the project.

Comment B.4: P. 107 (EIR p. 98) Use Guidelines for Public Address Systems (5): *“The District will have the stadium public address system professionally designed, installed, tuned, and field-tested*

with the goal of meeting the standards of the Mountain View 2030 General Plan to the greatest extent that goal is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.”

Comment: Later in the EIR, under Regulatory Framework, p. 109 (EIR p. 100), there is the following statement: *“The Natural Environment & Hazards Element of the City of Los Altos’ General Plan contains Noise and Land Use Compatibility Standards policies that are applicable to the project.”*

Requested revision: We request that the language on p. 107 (EIR p. 98) “The District will have the stadium public address system professionally designed, installed, tuned, and field-tested with the goal of meeting the standards of the Mountain View 2030 General Plan to the greatest extent that goal is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” be replaced by the following language: “The District will have the stadium public address system professionally designed, installed, tuned, and field-tested with the goal of meeting the standards of the Mountain View 2030 General Plan, the Los Altos General Plan Noise Standard, and the City of Los Altos Municipal Code to the greatest extent that goal is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.”

Response B.4: The noise analysis in the DEIR concluded that the proposed project would not result in a substantial noise increase which would conflict with relevant noise standards in the City of Mountain View or City of Los Altos. Administrative Regulation AR 7325 specifically states that the public address system will be “professionally designed, installed, tuned, and field-tested with the goal of meeting the standards of the exterior noise limits section of the Los Altos Noise Control Ordinance”. While AR 7325 does not require conformance with the City of Mountain View 2030 General Plan noise standards, the DEIR has taken into consideration applicable noise standards in both cities and determined that nighttime events, which include the use of the PA system, would not result in substantial noise increases. Revising the text of AR 7325 is outside of the scope of the DEIR and the suggested revisions may be considered by the Board at subsequent hearings. The text in the DEIR on page 98 has been revised to be consistent with AR 7325, as shown below in Section 5.0 Draft EIR Text Revisions.

Comment B.5: 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 MVHS Band Director expressed a wish that the direction the Band faces when practicing be changed from westward-facing to eastward-facing. Not only would this significantly change the noise impact on west neighbors, it would allow the band to practice without the late afternoon sun constantly in their eyes.

Requested revision: MVLA Neighborhood Cares asks that the Board and the District and MVHS Administration examine how this might be done, for the benefit of both the MVHS band and the nearest neighbors. 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 B.5: As noted in the comment and in the DEIR, the adopted Administrative Regulation AR 7325 requires marching band directors to take reasonable measures to minimize noise impacts on the surrounding neighborhoods. This could include reorientation of the direction the band faces. The feasibility of this alteration (and other alterations as necessary) will be examined on an ongoing basis once the project is operational. The use of lights for marching band practices would continue to be regulated by AR 7325; this regulation limits the number of practices to one weeknight per week ending by 8:00 p.m. and an additional weeknight per week ending by 6:30 p.m. Furthermore, the DEIR concluded on page 109 (see also Response A.1) that the estimated noise levels from marching band practices would not amount to a substantial increase in day-night average noise levels at nearby sensitive receptors.

Comment B.6: P. 113 (EIR p. 104) 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 Mountain View 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 B.6: 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, as described previously, 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 located at the press box) with a distributed sound system, which would allow for greater control of system noise levels as noted in the comment above.

Lastly, it should be noted that the DEIR incorrectly states on page 104 under Impact NOI-1 that the impact would be “less than significant with mitigation incorporated”. There was no significant impact identified and no mitigation measures are included under Impact NOI-1. This has been revised as shown in Section 5.0 Draft EIR Text Revisions.

Comment B.7: P. 345 (EIR Appendix, Hexagon, ii) Other Transportation Issues: *“Many game attendees would park off-site, so the project would increase the number of pedestrians using the nearby sidewalks and crosswalks. It is likely that attendees parked on surrounding streets or at the church would cross Truman Avenue at the field entrance where no crosswalk is present. To increase pedestrian safety, depending on the expected attendance, the school may need to have a crossing guard at the field entrance.”*

Comment: During night football games there is always a hazard of people jaywalking or walking in the street getting in or out of their cars without paying attention, especially at MVHS. This will be an unavoidable safety issue at nighttime events at both schools.

Requested revision: MVLA Cares agrees with Hexagon’s recommendation that MVHS consider having a crossing guard near the field’s entry for safety reasons. MVLA Neighborhood Cares recommends that the District work with the City of Los Altos to add a crosswalk street marking at this location. Additionally, pedestrian and parking hazards could be mitigated by encouraging full usage of the MVHS student parking lot for highly attended games. It is to be expected that many visiting fans will not be aware of its location, especially when approaching the school in a car at night. We think that for such games MVHS should consider including a few more subcontracted parking staff in addition to the proposed crossing guard. Subcontracted insured professional parking staff, outfitted in reflective vests and using handheld light wands, could direct traffic down Truman and to the right on Bryant for game night parking access in the student parking lot. In Spring of 2019 MVLA Superintendent Harding requested and received an estimate specifying a cost of ~\$700 for four people for 3 hours from the company that does Stanford game parking control. We can provide contact details for this company on request.

Response B.7: As noted on page 131 of the Draft EIR under Impact TRN-1, the District may elect to have a crossing guard to increase pedestrian safety on Truman Avenue. The District will look into options to increase pedestrian safety.

C. Dave Stubbs (dated May 31, 2020)

Comment C.1: This email is in response to the DEIR for the Mountain View High School (proposed) lights and public address system.

I have lived very near to the Mtn. View High School for over 30 years and have dealt with school-related, heavy traffic at key times throughout the school year. It is understandable to wish to increase the utilization of the school's artificial field but believe there is one important aspect of use that is not being stated up front.

There is no mention of the Mountain View Los Altos High School District's admission to not having adequate funding to pay for the lights and P.A. system, requiring them to allow other entities to use the field in the evenings, for a fee. This I find highly objectionable.

I can see the field's night use availability becoming a lightning rod for sports clubs in the bay area, extending use to the entire year. Owning a home near the high school would then be akin to living near a sports complex: the increased traffic and noise becoming highly objectionable.

Stated in the DEIR:

“The use of the field lights and public address system would be regulated by the Mountain View Los Altos High School District's Administrative Regulations 7325 and Board Policy 7325.”

This blanket statement potentially overrides the limited school use as stated in the DEIR. Regulations and policies can always be changed.

Response C.1: As stated on page 10 and 11 of the DEIR, the objectives of the proposed project are to provide the capability to host sport events and games at the athletic stadium on the Mountain View High School campus at night when students, parents, and community members can more easily attend, 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 practice times for after school sports and marching band due to school bell schedule and limited available daylight. The objective of the proposed field lights and PA system is not to allow other users outside of school to use the fields in the evenings. Any additional use of the sports fields is not covered by this EIR, and the District would be required to undertake additional environmental review in the future should any other uses be considered. The suggestion that the District would allow other entities to use the field in the evenings, for a fee, is speculation.

SECTION 5.0 DRAFT EIR TEXT REVISIONS

This section contains revisions to the text of the Mountain View 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 10 Section 2.2.2.3 Physical Design – Public Address System, the second paragraph will be **REVISED** as follows:

The proposed development will only be utilizing the new poles with speakers, including two new speakers mounted to the press box, and usage will abide by the new policies that have been adopted (See Table 2.2-1). The public address system would be designed to conform to the exterior noise limits section of the City of Mountain View Municipal Code and 2030 General Plan, the City of Los Altos General Plan noise standards, and the Los Altos Municipal Code. The applicable noise standards are described in *Section 3.13 Noise*.

Page 98 Section 3.13.1.2 Regulatory Framework - Mountain View Los Altos High School District Board and Administrative Policies, the fifth item will be **REVISED** as follows:

The District will have the stadium public address system professionally designed, installed, tuned, and field-tested with the goal of meeting the standards of the Los Altos Noise Control Ordinance to the greatest extent that goal is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

Page 104 Section 3.13.2.1 Project Impacts, Impact NOI-1 will be revised as follows:

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)~~ (Less than Significant Impact)

Appendix A: Draft EIR Comment Letters

Daniel Debrito

To: Pooja Nagrath
Subject: RE: MVHS Draft EIR - Comments

On Fri, May 8, 2020 at 12:04 PM Walt Rau <walt.rau@gmail.com> wrote:

Dear Mr. Mathiesen:

Please include the following comments as part of the formal EIR review process for SCH#2020010296, i.e. stadium lights, etc. at MVHS.

Table 1, which lists proposed uses, addresses marching band, both for practices and performances. In both cases, use of the public address system is allowed. Based upon MVLA meetings with MVLA Neighborhood Cares, I am confident that reasonable noise restrictions will be placed upon the public address system. However, no noise limits are stipulated for marching band itself. In other words, according to this EIR, noise emanating directly from marching band is unlimited. This represents a quality-of-life deterioration for nearby homes. Currently, without stadium lights, darkness forces marching band to stop practices or performances at sunset. This allows affected nearby homes to open windows, allowing enough time to cool off their interiors, especially sleeping areas, prior to bedtime. If marching band continues after sunset, windows cannot be opened, houses cannot be cooled adequately, and sleeping areas will remain uncomfortably hot.

With this in mind, the following is proposed. First, limit all marching band practices to completion no later than 6:30 pm. Second, monitor noise levels created by marching band, and limit noise levels, at the boundary, according to the same requirements for the PA system.

Please acknowledge receipt of these comments. Thank you for your efforts in managing this EIR process.

Walt Rau
1100 Blue Lake Square, Mtn. View, CA 94040

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

Subject: MVLA Neighborhood Cares Response to MVLA EIRs

To: Mathiesen, Mike <Mike.Mathiesen@mvla.net>

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

--

Regards,

Mac

Mac McConnell
650 996 7269

May 31, 2020

Mountain View/Los Altos Union High School District
Attn: Mike Mathiesen, Associate Superintendent
1299 Bryant Avenue, Mountain View, CA 94040

Dear Mike:

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 a Draft Environmental Impact Report*, and we appreciate this attention to detail.

However, we do have comments on these drafts and on 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.

MVHS DEIR Response

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

- pp. 1-168, the EIR body
- pp. 181-200, Appendix A, comment letters from neighbors and agencies
- pp. 201-214, Appendix B, photometric (field lights) measurements, Musco.
- pp. 216-300, Appendix C, March 2014 field upgrade geotechnical and hazard investigation, Cleary Consultants, Inc.
- pp. 301-305, Appendix C December 2019 drilling recommendations for light poles, Cleary Consultants, Inc.
- pp. 306-340, Appendix D, April 2020 noise report by Illingworth & Rodkin, Inc.
- pp. 341-376, Appendix E, April 2020 traffic report by Hexagon/David J. Powers & Associates, Inc.
- pp. 376-442 , MVHS Field Lighting Project TIA Technical Appendices.

Please consider the following:

p. 19 (EIR p. 10) Public Address System: *“the current PA system consists of three speakers which are attached to the press box at the western bleachers. The proposed project includes installation of an upgraded PA system, comprised of up to 12 speakers. Two of the speakers would be attached to the existing press box and the remaining 10 would be pole-mounted speakers, 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. 301-305 (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. 19 (EIR p. 10) Public Address System: *“The proposed development will only be utilizing the new poles with speakers and usage will abide by the new policies that have been adopted (See Table 2.2-1). The public address system would be designed to conform to the exterior noise limits section of the City of Mountain View Municipal Code and 2030 General Plan. The applicable noise standards are described in Section 3.13 Noise.”*

Comment: Later in the EIR, under Regulatory Framework, p. 109 (EIR p. 100), there is the following statement: *“The Natural Environment & Hazards Element of the City of Los Altos’ General Plan contains Noise and Land Use Compatibility Standards policies that are applicable to the project.”*

Requested revision: *We request that the language on p. 19 (EIR p. 10) “The public address system would be designed to conform to the exterior noise limits section of the City of Mountain View Municipal Code and 2030 General Plan.” be replaced by the following language: “The public address system would be designed to conform to the exterior noise limits section of the City of Mountain View Municipal Code and 2030 General Plan, the Los Altos General Plan Noise Standard, and the City of Los Altos Municipal Code”.*

p. 57 (EIR p. 48, 3.3.2.3): 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: While we recognize that there would not be new sources of emissions during the operation phase at MVHS, 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. 107 (EIR p. 98) Use Guidelines for Public Address Systems (5): *“The District will have the stadium public address system professionally designed, installed, tuned, and field-tested with the goal of meeting the standards of the Mountain View 2030 General Plan to the greatest extent that goal is capable of being accomplished in a successful manner within a reasonable period time, taking into account economic, environmental, legal, social, and technological factors.”*

Comment: Later in the EIR, under Regulatory Framework, p. 109 (EIR p. 100), there is the following statement: *“The Natural Environment & Hazards Element of the City of Los Altos’ General Plan contains Noise and Land Use Compatibility Standards policies that are applicable to the project.”*

Requested revision: *We request that the language on p. 107 (EIR p. 98) “The District will have the stadium public address system professionally designed, installed, tuned, and field-tested with the goal of meeting the standards of the Mountain View 2030 General Plan to the greatest extent that goal is capable of being accomplished in a*

successful manner within a reasonable period time, taking into account economic, environmental, legal, social, and technological factors.” be replaced by the following language: “The District will have the stadium public address system professionally designed, installed, tuned, and field-tested with the goal of meeting the standards of the Mountain View 2030 General Plan, the Los Altos General Plan Noise Standard, and the City of Los Altos Municipal Code to the greatest extent that goal is capable of being accomplished in a successful manner within a reasonable period time, taking into account economic, environmental, legal, social, and technological factors.”

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 MVHS Band Director expressed a wish that the direction the Band faces when practicing be changed from westward-facing to eastward-facing. Not only would this significantly change the noise impact on west neighbors, it would allow the band to practice without the late afternoon sun constantly in their eyes.

Requested revision: *MVLA Neighborhood Cares asks that the Board and the District and MVHS Administration examine how this might be done, for the benefit of both the MVHS band and the nearest neighbors. 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. 113 (EIR p. 104) 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 Mountain View 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. 345 (EIR Appendix, Hexagon, ii) Other Transportation Issues: *"Many game attendees would park off-site, so the project would increase the number of pedestrians using the nearby sidewalks and crosswalks. It is likely that attendees parked on surrounding streets or at the church would cross Truman Avenue at the field entrance where no crosswalk is present. To increase pedestrian safety, depending on the expected attendance, the school may need to have a crossing guard at the field entrance."*

Comment: *During night football games there is always a hazard of people jaywalking or walking in the street getting in or out of their cars without paying attention, especially at MVHS. This will be an unavoidable safety issue at nighttime events at both schools.*

Requested revision: *MVLA Cares agrees with Hexagon's recommendation that MVHS consider having a crossing guard near the field's entry for safety reasons. MVLA Neighborhood Cares recommends that the District work with the City of Los Altos to add a crosswalk street marking at this location. Additionally, pedestrian and parking hazards could be mitigated by encouraging full usage of the MVHS student parking lot for highly attended games. It is to be expected that many visiting fans will not be aware of its location, especially when approaching the school in a car at night. We think that for such games MVHS should consider including a few more subcontracted parking staff in addition to the proposed crossing guard. Subcontracted insured professional parking staff, outfitted in reflective vests and using handheld light wands, could direct traffic down Truman and to the right on Bryant for game night parking access in the student parking lot. In Spring of 2019 MVLA Superintendent Harding requested and received an estimate specifying a cost of ~\$700 for four people for 3 hours from the company that does Stanford game parking control. We can provide contact details for this company on request.*

From: [Mathiesen, Mike](#)
To: [DJ Halbert](#); [Pooja Nagrath](#)
Subject: Fwd: RESPONSE: DEIR for the Mountain View High School lights and public address system
Date: Monday, June 1, 2020 10:46:40 AM

Mike Mathiesen

Associate Superintendent Business Services
MVLA High School District
(650) 940-4650 x0020

----- Forwarded message -----

From: **Dave Stubbs** <aysoref.stubbs@gmail.com>
Date: Sun, May 31, 2020 at 2:59 PM
Subject: RESPONSE: DEIR for the Mountain View High School lights and public address system
To: <mike.mathiesen@mvla.net>

Dear Mr. Mathiesen,

This email is in response to the DEIR for the Mountain View High School (proposed) lights and public address system.

I have lived very near to the Mtn. View High School for over 30 years and have dealt with school-related, heavy traffic at key times throughout the school year. It is understandable to wish to increase the utilization of the school's artificial field but believe there is one important aspect of use that is not being stated up front.

There is no mention of the Mountain View Los Altos High School District's admission to not having adequate funding to pay for the lights and P.A. system, requiring them to allow other entities to use the field in the evenings, for a fee. This I find highly objectionable.

I can see the field's night use availability becoming a lightning rod for sports clubs in the bay area, extending use to the entire year. Owning a home near the high school would then be akin to living near a sports complex: the increased traffic and noise becoming highly objectionable.

Stated in the DEIR:

“The use of the field lights and public address system would be regulated by the Mountain View Los Altos High School District's Administrative Regulations 7325

and Board Policy 7325.”

This blanket statement potentially overrides the limited school use as stated in the DEIR. Regulations and policies can always be changed.

Thank you for your consideration.

Sincerely,

David Stubbs